

# Contents Page

<b>Respondent ID</b>	<b>Name</b>	<b>Page No</b>
2	Sue Ross.....	1
3	Alan Jardine.....	2
5	John Carruthers.....	3
6	Elaine Sherwen.....	4
7	E Lace.....	5
8	JF Hudson.....	50
9	Suzanne Brown.....	52
10	Helen, John,Maisie & Megan Naylor.....	54
12	Lorraine Morrison.....	56
15	Bob Curwen.....	58

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 January 2022 16:55  
**To:** Local Plan Consultation  
**Subject:** Local Plan 2021-2038 Consultation

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I would like to submit a comment/reply to the Copeland Local Plan 2021-2038 Consultation.

With regard to Drigg & Holmrook as a settlement cluster, I would support the two villages being retained as two separate sustainable rural villages, with no clustering.

The area/land between Smithy Banks and Groundy Croft lane should be deemed as a Protected Green Space.

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 January 2022 21:33  
**To:** Local Plan Consultation  
**Subject:** Fwd: Local Plan 2021-2038 Consultation

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I would like to submit a comment/reply to the Copeland Local Plan 2021-2038 Consultation.

With regard to Drigg & Holmrook as a settlement cluster, I would support the two villages being retained as two separate sustainable rural villages, with no clustering.

The area/land between Smithy Banks and Ground Croft lane should be deemed as a Protected Green Space.

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 28 January 2022 20:02  
**To:** Local Plan Consultation  
**Subject:** Local plan

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We are pleased to see that CBC have taken on board our comments about Drigg, Holmrook and the field behind Southerly in Drigg. It's good to know we are listened to, and agree with the new proposals.

Regards, [REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 03 February 2022 22:24  
**To:** Local Plan Consultation  
**Subject:** Copeland local plan 2021-2038

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Please be advised my concern re Bay Vista, Whitehaven. This site should not be considered as recently planning was refused on flooding and drainage issues which has always been a problem having lived on Victoria Road back in the '60's.

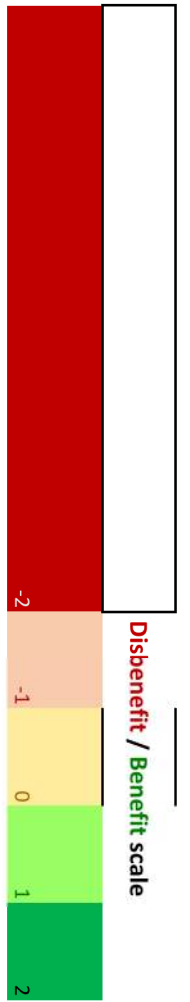
[REDACTED]  
Sent from my iPad

CRITERIA IN IHP (2017)	Comments (For)	Comments (Against)	Disbenefit / Benefit Score (-2 to +2)
In	<ul style="list-style-type: none"> <li>None raised</li> </ul>	<p><b>Scale is incompatible with the size of the village.</b></p> <ul style="list-style-type: none"> <li>Drigg evolved in a linear development along B5344 with space left for access to fields for agricultural purposes.</li> <li>Application deviates from this by instigating major development in non-linear fashion.</li> <li>Development would be a 10% addition to housing and 15% addition to the population.</li> <li>Agricultural village - provides agricultural housing. Retirement housing.</li> <li>Last saw a major development after 2nd world war due to munitions factory (Wray Head)</li> </ul> <p><b>Most services are not within walking distance for average person and inaccessible without a car (no bus).</b></p> <ul style="list-style-type: none"> <li>Only services in Drigg are the railway station, LLWR, church, village hall, Victoria Hotel and craft shop.</li> <li>LLWR provides negligible employment within Drigg.</li> <li>LLWR lacks a medical centre, school, chemist, dentist, open spaces or sports clubs</li> <li>Drigg is not in catchment area for Westlakes Academy, the nearest and favoured school</li> <li>Agricultural merchant (Tynedale) and post office and petrol station are over 1.5 km from the proposed development – most people would drive to Seascale / Gosforth / Egremont for services</li> <li>It is a material consideration that the applicant provides no update to Village Services Survey (2017) - but there is no longer a bus service and Seascale has lost its bank and 3 takeaway food outlets.</li> </ul> <p><b>B5344 is already at saturation point at key times of the day.</b></p> <ul style="list-style-type: none"> <li>New development lead to local increase in traffic.</li> <li>3-4 bedrooms implies 32 extra cars. In addition potential additional cars from approved Smithy Banks extension.</li> <li>Village struggles currently with traffic volumes - LLWR traffic, mini buses.</li> <li>Amenity - on street parking will be affected due to the widened junction of the development. Causing more cars to be parked on west side.</li> <li>Pinch points - cars can block road for larger vehicles going to LLWR.</li> <li>Dangerous crossing road e.g. to go to church etc.</li> <li>No storage areas planned for waste. Will there be a cattle grid?</li> <li>Existing damage to Church wall caused by traffic – will be exacerbated - cost of repair</li> <li>Safety - access of vehicles to existing houses is already an issue due to traffic levels, which will be made worse by this development</li> <li>Will refuse vehicles be allowed on to the estate - its a private estate.</li> <li>Will icy roads be untreated?</li> </ul>	-2
A Scale	<ul style="list-style-type: none"> <li>Drigg is in catchment area for 2 Primary schools - Seascale and Gosforth - depending on transport.</li> <li>Secondary schools - in catchment area for Millom only (45 minutes on school bus) (if there is spare capacity at Westlakes Academy you can request a place)</li> </ul>	<p><b>Most services are not within walking distance for average person and inaccessible without a car (no bus).</b></p> <ul style="list-style-type: none"> <li>Only services in Drigg are the railway station, LLWR, church, village hall, Victoria Hotel and craft shop.</li> <li>LLWR provides negligible employment within Drigg.</li> <li>LLWR lacks a medical centre, school, chemist, dentist, open spaces or sports clubs</li> <li>Drigg is not in catchment area for Westlakes Academy, the nearest and favoured school</li> <li>Agricultural merchant (Tynedale) and post office and petrol station are over 1.5 km from the proposed development – most people would drive to Seascale / Gosforth / Egremont for services</li> <li>It is a material consideration that the applicant provides no update to Village Services Survey (2017) - but there is no longer a bus service and Seascale has lost its bank and 3 takeaway food outlets.</li> </ul> <p><b>B5344 is already at saturation point at key times of the day.</b></p> <ul style="list-style-type: none"> <li>New development lead to local increase in traffic.</li> <li>3-4 bedrooms implies 32 extra cars. In addition potential additional cars from approved Smithy Banks extension.</li> <li>Village struggles currently with traffic volumes - LLWR traffic, mini buses.</li> <li>Amenity - on street parking will be affected due to the widened junction of the development. Causing more cars to be parked on west side.</li> <li>Pinch points - cars can block road for larger vehicles going to LLWR.</li> <li>Dangerous crossing road e.g. to go to church etc.</li> <li>No storage areas planned for waste. Will there be a cattle grid?</li> <li>Existing damage to Church wall caused by traffic – will be exacerbated - cost of repair</li> <li>Safety - access of vehicles to existing houses is already an issue due to traffic levels, which will be made worse by this development</li> <li>Will refuse vehicles be allowed on to the estate - its a private estate.</li> <li>Will icy roads be untreated?</li> </ul>	-2
B Services and Facilities	<ul style="list-style-type: none"> <li>None raised</li> </ul>	<p><b>B5344 is already at saturation point at key times of the day.</b></p> <ul style="list-style-type: none"> <li>New development lead to local increase in traffic.</li> <li>3-4 bedrooms implies 32 extra cars. In addition potential additional cars from approved Smithy Banks extension.</li> <li>Village struggles currently with traffic volumes - LLWR traffic, mini buses.</li> <li>Amenity - on street parking will be affected due to the widened junction of the development. Causing more cars to be parked on west side.</li> <li>Pinch points - cars can block road for larger vehicles going to LLWR.</li> <li>Dangerous crossing road e.g. to go to church etc.</li> <li>No storage areas planned for waste. Will there be a cattle grid?</li> <li>Existing damage to Church wall caused by traffic – will be exacerbated - cost of repair</li> <li>Safety - access of vehicles to existing houses is already an issue due to traffic levels, which will be made worse by this development</li> <li>Will refuse vehicles be allowed on to the estate - its a private estate.</li> <li>Will icy roads be untreated?</li> </ul>	-2
C Highways and Transport	<ul style="list-style-type: none"> <li>None raised</li> </ul>	<p><b>B5344 is already at saturation point at key times of the day.</b></p> <ul style="list-style-type: none"> <li>New development lead to local increase in traffic.</li> <li>3-4 bedrooms implies 32 extra cars. In addition potential additional cars from approved Smithy Banks extension.</li> <li>Village struggles currently with traffic volumes - LLWR traffic, mini buses.</li> <li>Amenity - on street parking will be affected due to the widened junction of the development. Causing more cars to be parked on west side.</li> <li>Pinch points - cars can block road for larger vehicles going to LLWR.</li> <li>Dangerous crossing road e.g. to go to church etc.</li> <li>No storage areas planned for waste. Will there be a cattle grid?</li> <li>Existing damage to Church wall caused by traffic – will be exacerbated - cost of repair</li> <li>Safety - access of vehicles to existing houses is already an issue due to traffic levels, which will be made worse by this development</li> <li>Will refuse vehicles be allowed on to the estate - its a private estate.</li> <li>Will icy roads be untreated?</li> </ul>	-1

D	Infrastructure Capacity	<ul style="list-style-type: none"> <li>• All impacts can be mitigated given sufficient resources and approvals</li> <li>• Grid MAY have to improve electrical supply for the benefit of Drigg as a whole as a result of proposed development</li> </ul> <p><b>Extra burden on school or social care / no suggestion there are any steps offered to mitigate</b></p> <ul style="list-style-type: none"> <li>• Schools - opportunity to add extra places at Seascale School has been missed - no extra places have been provided.</li> <li>• Difficulties accessing healthcare (Seascale)</li> <li>• Not been identified as social care (for elderly population).</li> <li>• Drainage can not cope with current levels of flood water</li> <li>• Electrical supply currently struggles to meet demand as experienced by local residents- development will add extra burden on infrastructure</li> </ul> <p><b>Current well documented flooding issues affecting B5344 and adjacent houses will be exacerbated by development</b></p> <ul style="list-style-type: none"> <li>• Application recognises drainage issues which limit houses on the site to 16.</li> <li>• B5344 and Watery Lane flood 2 - 3 times per year.</li> <li>• Drainage to be directed to drain which crosses land owned by various land owners.</li> </ul> <p>Flooding on highway is existing issue - current system can't cope with current water flow. Existing houses already affected and 16 more houses will increase the flood effects.</p> <ul style="list-style-type: none"> <li>• No mains sewage – this has blocked previous applications for developments in the past.</li> <li>• Some existing houses at higher level may discharge water onto the field - not included in drainage calculations.</li> <li>• Currently a flooding issue on land south of B5344 (downstream of proposed development) due to a bottleneck downstream which would be exacerbated by the proposed development.</li> <li>• Highways have made no attempt to improve drainage at that location since 2011 and will not force land owners downstream of the development to improve drainage from the proposed site.</li> </ul> <p><b>Few services within walking distance, no pavements will result in car journeys</b></p> <ul style="list-style-type: none"> <li>• Few facilities (no open spaces / sports clubs)</li> <li>• Difficulty crossing road to church</li> </ul>	-2
E	Safe accessible environment / good access to range of facilities	<ul style="list-style-type: none"> <li>• Church and village hall are within walking distance</li> </ul>	-1
F	Flood risk zone 3a/3b	<ul style="list-style-type: none"> <li>• Not relevant to this</li> </ul> <p><b>Flooding in flood risk zone 3a/3b is impacted by adverse impacts upstream of flood risk 3a/3b</b></p> <ul style="list-style-type: none"> <li>• Has been flooding onto the Holmes (meadows south of the Church) due to work conducted on river upstream. Mayerling and Hill Crest flood. Property alteration at the Church Style Farm will also impact on drainage.</li> <li>• Currently a flooding issue on land south of B5344 (downstream of proposed development) due to a bottleneck downstream (John Jennings) which would be exacerbated by the proposed development</li> </ul>	-1
G	Lake District National Park	<ul style="list-style-type: none"> <li>• Not relevant to this</li> </ul>	0

H	Affordable Housing	<ul style="list-style-type: none"> <li>Small houses for single/elderly people may be needed (no survey data - anecdotal) but none in application.</li> <li>Although existing houses are not selling it is not known if there may be desire for new housing?</li> </ul>	<p><b>None in outline application</b></p> <ul style="list-style-type: none"> <li>Can not force developer to include affordable housing</li> </ul>	0
I	Executive housing		<p><b>There are 7 executive style houses in the application. Need is not demonstrated due to the empty properties and the time taken for houses to sell.</b></p> <ul style="list-style-type: none"> <li>Last housing survey did not identify housing needs.</li> <li>Outline application therefore not known what housing would be built and what benefits could be gained.</li> <li>Currently 13 homes for sale in vicinity covering a range of housing types.</li> <li>More empty houses will be coming onto market with no evidence for local need.</li> </ul>	-1
J	Design	<ul style="list-style-type: none"> <li>Outline includes single storey (however could change as only outline application)</li> </ul>	<ul style="list-style-type: none"> <li>Incongruous in context of Drigg's historic and agricultural buildings (in particular The Gables is adjacent)</li> </ul>	-1
K	Intrusion into open countryside	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>In Drigg open countryside runs up to B5344 in places – in this context it is a significant intrusion.</li> <li>Valuable agricultural land - in constant use - has road access. Currently 7-8 farms in village</li> <li>Proposal incorrectly states there are no hedgges on boundaries - stretches along road will be removed</li> </ul>	-2
L	Landscape	<ul style="list-style-type: none"> <li>None</li> </ul>		-1
M	Master Plan	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>A Master Plan has not been provided - guidance states Major Developments should be accompanied by a Master Plan (more than 10 houses = major development) - what houses would be provided in next 5 years</li> </ul>	0
	Other issues		<p><b>Any development should not make environment worse however this will severely impact neighbouring properties</b></p> <ul style="list-style-type: none"> <li>Neighbouring properties will be overlooked - terrain rises at back so houses will be able to see into existing houses. Disrespect for privacy of existing properties as evidenced by several neighbours.</li> <li>House opposite the entrance to the development has bedrooms facing development – vehicles exiting the development will see / shine headlights into bedrooms.</li> </ul>	-2
	Residential Amenity	<ul style="list-style-type: none"> <li>Planning permission may limit where windows would overlook other properties.</li> </ul>		-2
	Environment and biodiversity	<ul style="list-style-type: none"> <li>None</li> </ul>	<p><b>Field is rich in wildlife</b></p> <ul style="list-style-type: none"> <li>Application states no protected species, however there has been no preliminary Environmental Assessment by an independent consultant</li> <li>Neighbours regularly observe owls, bats, deer, toads, other wild birds and animals not all listed here</li> <li>Proposal incorrectly states there are no hedgges on boundaries</li> <li>Light pollution and noise</li> </ul>	-2





**MINUTES FROM THE PUBLIC MEETING HELD IN DRIGG VILLAGE HALL ON 19 AUGUST 2019**

To review

**APPLICATION FOR OUTLINE PLANNING PERMISSION for up to 16 houses on land adjacent to Southerly, Drigg, Cumbria, CA19 1XG Copeland Reference 4/19/2240/001 with full permission for Access.**

Meeting opened at 18:00

**Item 1**

[REDACTED] welcomed everyone to the meeting, provided Fire and Safety information and introduced [REDACTED] who would act as Chairman of the meeting.

**Item 2**

[REDACTED] advised that he was a Carleton resident, Parish and Borough Councillor and a former member of Copeland Borough Council (CBC) Planning Panel. [REDACTED] stated that the purpose of the meeting was to determine the parish residents' views on the planning application in order to inform the Parish Council response. [REDACTED] also advised how the meeting would be conducted, that there would be a number of topics from the CBC Interim Housing Policy (IHP) which would be explained and he would ask the attendees to give their opinions. All attendees could share their views (for and against) by indicating they wished to speak by raising their hands.

**Item 3**

[REDACTED] outlined how Copeland's Planning Applications were determined, either assessed by the Planning Officer or in this case by the Planning Panel who would look at all the documents produced. The Planning Panel is not a political body but a quasi-legal body.

[REDACTED] advised that the National Planning Policy Framework (NPPF) is the main policy, the rules which all planning authorities have to abide by. There is currently no 5 year housing supply so CBC had developed the IHP to supplement the Copeland Local Plan 2013-2028 (CLP) as Copeland is under delivering in terms of houses built. The introduction of the IHP means that other land is available for development which wouldn't have normally been accepted, this application being one. The 5 year housing supply document is currently being re-written. There is a presumption in favour of development.

[REDACTED] advised that deadline for objections from individuals had passed on 14 August but that the Parish Council (PC) had been given an extension due to the fact that no PC meeting is held during August. (Meetings are normally held on the second Tuesday of the month). The PC response would only be one opinion, the same as any individual who had responded. This application would likely be discussed at the CBC Planning Meeting in October. The strength of local feeling would not be taken into account, only material planning matters. Anyone who has written a letter of objection could attend the Planning Panel and speak for a maximum of 5 minutes.

**Item 4**

[REDACTED] then spoke in more detail about the NPPF and looked at some of the policies to see how they would apply to this situation. Local issues are relevant and a different part of Drigg was been classed as a rural exception area before the local rule book was torn up due to the lack of a demonstrable 5 year housing supply in Copeland. Villages should be allowed to grow and thrive and isolated homes should be avoided. A prosperous rural economy is to be encouraged but there was a requirement to conserve and enhance the natural environment. Although there is a presumption in favour of sustainable development, adverse impacts should not significantly and demonstrably outweigh the benefits of any development.

## Item 5

The applicant, [REDACTED], was present at the meeting but declined the opportunity to present the planning application to the attendees as he said that he had not checked his letter box so had not had much notice of the public meeting. [REDACTED] advised that his Agent would respond on his behalf to any questions attendees had but the Agent was not present due to the fact that [REDACTED] had only just become aware of the public meeting himself. (Note - Leaflets advising of the public meeting were hand delivered to local residents in the week prior to the meeting and also placed in public places throughout the Parish)

[REDACTED] showed the attendees the plan of the proposed development (which was submitted with the planning application) on the overhead projector (OHP). [REDACTED] briefly described the application for outline planning permission for up to 16 houses (9 family size houses and 7 executive size single storey houses) and full planning permission for access. [REDACTED] did not offer any correcting information.

## Item 6

An open floor discussion then took place based on the criteria in the IHP. Each criteria in turn from A to M was shown on the OHP with [REDACTED] asking for views before moving on to the next item.

### Criteria A – The Scale of the Development

[REDACTED] started by saying that the village has been developed in a linear fashion along either side of the B5344 with space left for access to fields for agricultural purposes. The application deviates from this traditional linear development by instigating major development in a non-linear fashion. An additional 16 properties would mean an increase of 10% to the number of households in this village.

[REDACTED] added that the non-linear nature of the village was a material matter for planning purposes and described Drigg as a small village with no defined boundary. Drigg is considered to be an agricultural village as evidenced by the number of working and former farms. He described the application as a major development and noted that the last major development in the village was the post war construction of Wray Head to support employment at the munitions factory that became the Low Level Waste Repository (LLWR).

### Criteria B – The level of Services and Facilities in the Settlement

[REDACTED] stated that the only facilities in the village are the church and village hall, the Victoria Hotel, railway station and the Low Level Waste Repository (LLWR). LLWR contributes negligible employment within the village. Drigg lacks a school, a medical centre, chemist, hairdresser, hardware store and a convenience store (as defined in the Village Services Survey (2017)). The agricultural merchant / post office in Holmrook is **1.5 km** from the proposed development and the petrol station with a small grocery store is **1.9 km** from the development. It is unfeasible to assume that most residents would walk to access these facilities, especially taking into account the higher than average percentage of retirees living in the village.

[REDACTED] said that the fact that children of secondary school age living in the village could attend one of two schools could be seen as a positive. Millom is the first choice and in recent years children have struggled to get into Westlakes Academy.

[REDACTED] added that since the 2017 Village Services Survey Drigg had lost its public bus service.

### Criteria C – Capacity and Safety of the Highway and Transport Network.

[REDACTED] spoke about how the new development would lead to an increase of traffic in the village. Based on 16, 3 and 4 bedroom houses that would lead to an increase of 30 cars in the middle of the village and that the volume of traffic is already an issue. Parking near the development would become an issue as it is illegal to

park opposite a junction or within 32 feet of the proposed junction. Residents who live in the village near the pinch point of Drigg Hall already have issues getting out of their driveways and speeding vehicles are an issue. Crossing the road is already dangerous and more traffic would lead to more dangerous roads. John also questioned what provisions would be made for refuse collection as Drigg residents leave their bins beside the main road. This would mean 16 refuse bins once a fortnight and 64 recycling bins once a fortnight.

advised that the B5344 is treated for icy roads due to its proximity to LLWR. The diagram shown on the screen was an illustrative plan to show that 16 houses could fit into the plot. The road on the development could be adopted later on and CBC would have to decide on refuse wagons entering the estate.

queried the disruption to the village caused by construction traffic which would all have to come past Drigg church. There was also a worry over how long the construction would take once started and would there be an end date to construction imposed.

added that lorry movements could be restricted to certain times so that they don't travel through the village during school pick up/drop off times as LLWR abide to. It is not normal to impose an end date on a development as long as it started within a specified time.

A resident asked if the houses would be leasehold/freehold. Andy advised that this is not known in the outline application and it is not a material planning matter.

A resident added that the church wall was currently damaged and would need repaired shortly and was worried that the additional construction traffic would cause further damage to the wall.

#### **Criteria D - Impacts of Development on Infrastructure Capacity should be Mitigated**

said that the Seascale school had recently been modernised but that there were no additional places available for children. The school register is nearly at capacity. The Seascale surgery suffers similar issues to the rest of the Health Service with problems attracting health professionals. In terms of Adult Social Care the development is not identified as a retirement home so the impact is unquantifiable. He focused on surface water drainage, which is an issue already in the village and noted that the application has restricted the number of houses to 16 based on engineering calculations on the capacity of the field to cope with surface water. Water will run into long established existing drains which already struggle to cope with the volume. These drains pass under the B5344, under Edgefield, through fields belonging to 2 other residents of Drigg plus the Muncaster Estate before discharging into the river Irt. wondered how the Highways Authority would deal with the extra water discharged.

#### **Criteria E – Safety**

stated that there are not many services within walking distance of the development. Residents wishing to get to Whitehaven hospital would need to catch a train followed by a bus/taxi. There is no pavement on the side of the road where the development will be built so there will be more pedestrians crossing the road.

#### **Criteria F – Flood Risk**

started by saying that the application mentioned mitigation measures. The application didn't say who would be responsible for the maintenance of the water storage tanks which would hold excess water before releasing it into the drainage system once there was capacity. The developer would have to include this in their detailed submission and this is a material planning matter. Highways had not responded yet as consultation had not finished.

said that there was an existing issue with flooding in this location, the drainage not able to cope with the water that is currently produced. This area floods 2 or 3 times per year the most recent time being during heavy rain on 30 July 2019. Extra water would only add to the current issue which has been in existence since 2006 with Highways being involved in trying to rectify the matter between 2006 and 2011. SB opined that the surface water flooding needed rectifying before the application was approved.

said that it could be seen as a positive if Highways could deal with the flooding and Highways could also ask the developer to mitigate.

added that the flooding issues in the village are caused by the fact that we are not on mains drainage. All houses to the West of Smithy Banks at Holmrook are on private sewerage.

added that this area is not in a river flood area as defined by the Environment Agency, the surface water flooding being the result of infrastructure issues.

### **Criteria G – Lake District National Park LDNP**

The development is not in the LDNP and can't be seen from the LDNP so is not a matter for the LDNP.

### **Criteria H – Affordable Housing**

said that housing needs were not identified in the Parish Plan as this did not form part of the survey. There is a lack of smaller homes for elderly residents to stay in the village. There is no affordable housing in the application but this would be identified in detailed planning.

queried the need for more houses in the village as there are already 13 houses for sale between Stubble Green and Holmrook with 5 houses empty and a further 2 sitting empty following recent bereavements.

said that there was a range of houses for sale between £100k and £500k with a mixture of different types of housing. Houses in Drigg take a long time to sell.

also queried the need for additional housing in the village.

said that the need for housing is not a material planning matter and new build homes were sometimes seen as more attractive by prospective purchasers.

added that as this was a major development (more than 10 houses) that 10% of the houses needed to be affordable houses. Affordable housing should not be confused with cheap housing. suggested that the Parish Council should ask CBC what they think is the planning need in central Copeland.

### **Criteria I – Executive Housing**

This detail is not in the outline planning application and no justification is provided although up to seven 4+ bedroom houses are proposed.

### **Criteria J – High Quality Design Respecting the Rural Character of the Settlement.**

Houses in Drigg are of an individual type arranged in a linear fashion respecting the rural character of the village. There is every combination of house in the village.

stated that a modern development would be incongruous next to older properties.

said that the houses in the outline planning application were shown as single storey dormer style properties.

### **Criteria J – Open Countryside**

stated that the proposed development site was agricultural land.

described Drigg as a loose formed and non-delineated settlement surrounded by the countryside. The countryside comes up to the main road in a number of places. The presence of livestock in this field also gives the impression of open countryside. There is no evidence to suggest that this is a SSSI. The land is agriculturally valuable. It has roadside access and has been used historically for highly valuable animal husbandry.

The proposed development would not result in 2 settlements merging.

### **Criteria L – Landscape Character**

said that permitted development is allowed and that you 'couldn't buy a view' but queried privacy laws and properties being overlooked.

said that this criteria had not been given any weight during the determination of the proposal for a major development at Smithy Banks in Holmrook.

### **Criteria M - Major Developments Should be Supported by a Masterplan**

A masterplan had not been produced with this outline planning application but would be requested for a detailed planning application. There is no 5 year housing supply at the moment. There is no penalty if the developer does not do what they said in the masterplan. CBC are measured against delivery not what is planned.

There are 2 other catch all categories which should be considered.

#### **1. Public Amenity**

pointed out that she lived adjacent to the proposed development site and that as the site rose towards the rear of the field new properties shown on the outline planning application would look into her bedroom, bathroom, kitchen and conservatory. She currently has a 5 foot wall at the rear of her property but the foundations of some of the new properties would be level with the top of this wall. She pointed out that the village has developed as a linear model and assumed that only infill would be permitted in accordance with the rest of the village.

said that prior to purchasing her house overlooking this field she had spoken to the Planning Officer in post at that time (specifically about this field) who said that permission would only be granted for infill beside the main road.

was worried about privacy as her home is directly opposite the proposed development with bedrooms at the front. Headlights from vehicles exiting this new estate would shine directly into the homes opposite.

advised that windows in properties in the new development could be limited in the walls overlooking existing properties.

#### **2. Environment/Biodiversity**

advised that Drigg is a farming community with that field being rented by local farmers to graze livestock and take hay crops. There would be a loss of farming land as a result. The field is rich in wildlife. He pointed out that the application said that there were no protected species or habitats. The application also said that there were no trees or hedges but that the field is surrounded by both on 3 sides.

said that a preliminary environmental assessment should have been carried out and that Natural England will be interested. Light pollution and noise would be an issue.

● advised that the statutory consultees may not have responded yet but will before the application goes before the Planning Panel. The Planning Panel would ask why assessments had not been undertaken and the Environment Agency would carry out their own survey.

● resident said that there were bats roosting at the Gables which is adjacent to the field.

● asked if the Utilities companies had been consulted as this area is near the end of the supply line for the network and there are issues currently with supply without an extra 16 properties being added.

● advised that they are statutory consultees so should have been consulted.

● asked if there were any current properties whose surface and treated water drained onto this field and was advised that the water from the Gables did drain into this field as they were set higher on the land. The proposed development would have to cope with any extra water which drained onto it.

● said that surface water backs up into his field as the down-stream system is at capacity and was worried that the auto system would release water into the drains and flood his field. He asked if the developer was obliged to make improvements to the drains.

● advised that Highways should address this in their statutory response.

● advised that he had become aware that there had been issues with the drainage under his newly purchased property since 2011.

● then spoke about lessons learnt from other recent planning applications including the 2018 Smithy Banks extension and Weddicar Hall conversion.

● summed up the public responses which she had been collating in a spreadsheet.

● summed up by saying that the planning application would probably go before the Planning Panel in late October with the site visit taking place on the morning of the planning meeting. 13 weeks is the CBC target to determine major development applications so October should be the meeting date. If the Planning Panel refuse the application the applicant can appeal but if approved the public have no right of appeal. If passed in principle the developer can take up to 3 years to come back with detailed plans. Any member of the public who has registered an interest to speak at the planning meeting would get 7 days notification.

AOB

● said that her home is one of those for sale and has had little interest, the Estate Agent saying that the proposed development could be putting prospective buyers off. She added that she had to reverse into her property from the main road and speeding traffic was an issue.

● concluded by saying that the residents should be pressing issues in the village to be rectified (eg flooding & speeding) by attending Parish Council meetings to get their views across.

Any parishioner can attend any Parish Council meeting which are held on the second Tuesday of each month (except August).

There being no further points raised for consideration the meeting closed at 20:30.

Part 2 of [REDACTED] Response to Local Plan Consultation - HDH1 (DH004)

[REDACTED]  
[REDACTED]  
Holmrook  
[REDACTED]

15 /11/2020

Strategic Planning  
Copeland Borough Council  
The Market Hall  
Market Place  
Whitehaven  
Cumbria CA28 7JG  
Dear Sir / Madam

**Re Local Plan Consultation – response specifically regarding Drigg/Holmrook Developable site HDH1 (DH004) – Land north of Meadowbrook. Site previously submitted for development: “Proposed outline application for housing including approval of access, land adjacent to Southerly, Drigg CA191XG -Copeland Reference 4/19/2240/001”**

Please find below part 2 of my response to the Local Plan Consultation, consisting of my OBJECTION to “developable” site HDH1 (DH004), which has been the subject of a planning application in 2019-20 Reference 4/19/2240/001. Please see separate Part 1 of my response which addresses the wider implications of the Local Plan as it affects Drigg and Holmrook.

Firstly on a personal level, when my husband and I moved to Drigg we wished to live in a rural village. Our house overlooks “HDH1” (site identified as “Developable” adjacent to “Southerly / renamed north of Meadowbrook). Before we purchased our house we enquired at Copeland Council whether the field was likely to be developed. We were informed by the planning officer that only the plot adjacent to road could be developed since the rest of the field was outside the development boundary. If we had known Copeland planning department could change this policy we would not have bought this house!

I would like remind the Strategic Planning Department that HDH1 has been the subject of a planning proposal (PP-07930856 - LAND ADJACENT TO “SOUTHERLY”, DRIGG, application for up to 16 houses). This has been the subject of considerable local opposition for over 12 months which has been expressed both to Copeland Planning Department and Drigg & Carlton Parish Council, due to the proposed development being unsuitable for many reasons in particular it would exacerbate a well-known flooding issue. To date the County Highways department are unable to support this development due to the flooding.



A public meeting was held in Drigg Parish Hall on 19 August 2019 to discuss the Southerly planning application which was attended by 33 members of the public, including the applicant (a record of names / addresses of attendees has been kept). This meeting resulted in a set of minutes and a spreadsheet review of the planning application when assessed against criteria listed in the national framework guidelines and Copeland BC's interim housing policy. The criteria were scored according to the following scale: -2 (strong disbenefits) -> 0 (neutral) -> 2 (strong benefits). A summary of the discussions of the criteria and their scores are given below. The record of comments against each criteria from the public meeting are provided in the attached file.

- A) SCALE: Scale is incompatible with the size of the village Score of minus 2
- B) SERVICES AND FACILITIES: Most services are not within walking distance for average person and inaccessible without a car (no bus). Score of minus 2
- C) HIGHWAYS AND TRANSPORT: B5344 is already at saturation point at key times of the day. Score of minus 1
- D) INFRASTRUCTURE CAPACITY: Extra burden on school or social care / no suggestion there are any steps offered to mitigate. Current well documented flooding issues affecting B5344 and adjacent houses will be exacerbated by development. Score of minus 2
- E) SAFE ACCESSIBLE ENVIRONMENT / GOOD ACCESS TO RANGE OF FACILITIES: Few services within walking distance, no pavements Will result in car journeys. Score of minus 1
- F) FLOOD RISK ZONE 3A/3B: Flooding in flood risk zone 3a/3b is impacted by adverse impacts upstream of flood risk 3a/3b. Score of minus 1
- G) LAKE DISTRICT NATIONAL PARK Not relevant / not scored
- H) AFFORDABLE HOUSING: None in outline application. Score of zero
- I) EXECUTIVE HOUSING: There are 7 executive style houses in the application. Need is not demonstrated due to the empty properties (in Drigg) and the time taken for houses to sell. Score of minus 1
- J) DESIGN: Incongruous in context of Drigg's historic and agricultural buildings (in particular "The Gables" is adjacent). Score of minus 1
- K) INTRUSION INTO OPEN COUNTRYSIDE: In this context it is a significant intrusion. Valuable agricultural land - in constant use. Score of minus 2
- L) LANDSCAPE: Proposal incorrectly states there are no hedges on boundaries - stretches along road will be removed. Score of minus 1

M) MASTER PLAN: A Master Plan has not been provided - guidance states Major Developments should be accompanied by a Master Plan (more than 10 houses = major development) - what houses would be provided in next 5 years. Score of zero

Other issues:

RESIDENTIAL AMENITY: Any development should not make environment worse however this will severely impact neighbouring properties. Score of minus 2

ENVIRONMENT AND BIODIVERSITY: Field is rich in wildlife. Score of minus 2

This evidence was provided to both Drigg & Carlton Parish Council (Minutes of Drigg & Carlton Parish Council meeting of Tuesday 10 September 2019) and were emailed Copeland Planning Department in response to the application.

Drigg and Carlton Parish Council also received 25 signed emails and letters and as many emails regarding the application, every one of the correspondence was in opposition to the application; there were none received in favour. (Minutes of Drigg & Carlton Parish Council meeting of Tuesday 10 September 2019. Drigg & Carlton Parish Council also expressed their objection on these grounds to Copeland BC.

Despite having submitted this community led analysis of this application to CBC, the Planning Department have ignored local knowledge and views and this application was allowed to drag on for over 12 more months until the applicant (probably temporarily) withdrew his application.

**I would now like to add further points in the context of the site now being identified in the Local Plan (Developable site HDH1 /DH004) – proposal for 32 houses)**

Referring to assessment of “developable sites” HDH1 and HDH2 under assessed key criteria (from Copeland Local Plan 2017-2035: Integrated Assessment of the Preferred Options and Issues and Option Drafts) – see snip below:

	Biodiversity	Landscape/heritage	Water resources	Climate change	Flood risk	Energy	Land quality	Air quality	Waste and recycling	Accessibility	Health/wellbeing	Education	Sustainable economy	Leisure/tourism	Housing	Retail	Transport
<b>Drigg and Holmrook</b>																	
HDH1	U	U	-	U	U	U	-	U	U	+	+	?	+	-	+	?	U
Possible harm to surrounding NDHA's																	
HDH2	-	-	-	U	U	U	?	U	U	+	+	?	+	?	+	?	U
Harm to setting of New House Farm. Presence of Natterjack Toads on site. Potential for surface water drainage issues																	

**Reasons for objections to HDH1**

NB possible harm to NDHA = Non Designated Heritage Asset - the assessment overlooks potential harm to the adjacent Non Designated Heritage Asset “The Gables” and only refers to the nearby Church complex

**Biodiversity** – stated as “U” – **should be be negative** - surrounded by open countryside and adjacent woodland – see Figure 1 below

**Flood risk** stated as “U”– **should be be negative** - there is a well known flooding issue on the site – at present is subject to objection by County Highways Department

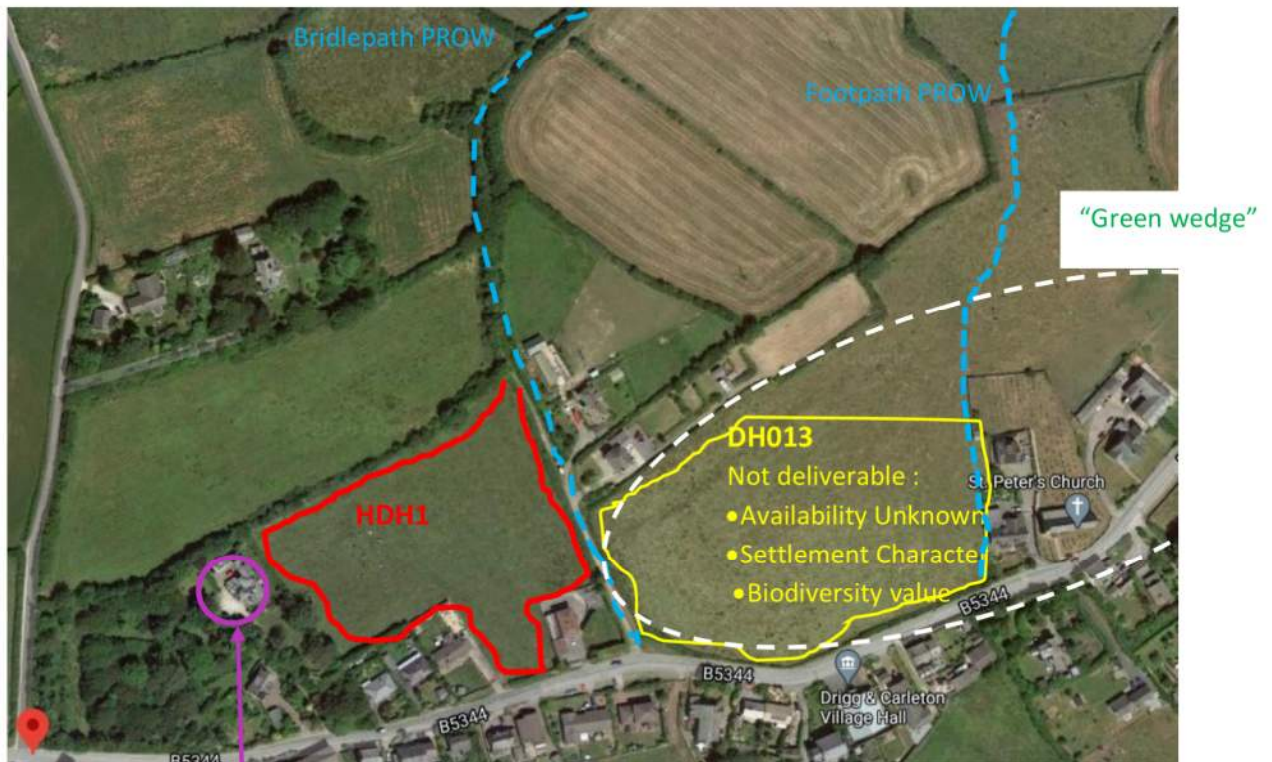
**Climate Change** stated as “U” – **should be be negative** - most shops and services are not accessible by public transport or within 1 mile of facilities by satisfactory pedestrian access. Increased use of road traffic

**Accessibility** stated as green – **should be be negative** – as above for lack of pedestrian access / public transport

**Health and well being** stated as green– **should be be negative** – people move to Drigg for a rural village not to live in a housing estate.

Please see Figure 1 below which illustrates HDH1 in context of its being surrounded by open countryside yet has the criteria as the adjacent to the site DH013 which is considered “undeliverable” since it is in a protected “green wedge” and due to its settlement character and biodiversity value.

**Figure 1 showing “green wedge” (white dashed line), HDH1 site identified as “developable” (red) and DH013 site identified as “undeliverable” (yellow). PROWs in dashed blue lines.**



← HDH1 site overlooked by “The Gables” – visible from B5344, bridlepath PROW and footpath PROW. Settlement character is comparable to the Church complex which is protected from development

The “green wedge” (white dashed line) should be extended west to include “The Gables” and the bulk of the HDH1 field since this is surrounded by open countryside and to protect the settlement character of “The Gables”.

**I object to the HDH1 development since it meets the same criteria that adjacent DH013 was assessed as “undeliverable”. HDH1 is:**

- **In open countryside**
- **Biodiversity value - surrounded by hedges and adjoined to woodland to west – has more natural habitat than adjacent undeliverable site DH3013**
- **Settlement character - adjacent to historical house “The Gables” –visible from B5344, bridlepath PROW and footpath PROW running across field from B5344 adjacent to Church (blue dashed lines)**
- **Existing well known flooding – to date Highways Department oppose application for 16 houses under PP-07930856**
- **Fewer adjacent houses than DH002, DH008 and DH009 which are also protected due to reasons of settlement character, landscape protection and biodiversity value**
- **Poor footpath access to limited facilities. Footpaths are less than ONE METRE at several stretches**
- **There are more suitable brownfield sites available for development in Drigg and Holmrook – the Council must not steam-roller opportunist inappropriate applications when better sites are available.**

Yours faithfully

[REDACTED]



COWS BEING MOVED IN DRIGG.

PHOTOGRAPH TAKEN OUTSIDE HDH1 (DH004) ILLUSTRATING THE RURAL AGRICULTURAL NATURE OF THIS LOCATION

I attach overleaf my previous objections to **Proposed outline application for housing including approval of access, land adjacent to Southerly, Drigg CA191XG Copeland Reference 4/19/2240/001** . I still consider these points relevant to HDH1.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

21 /03/2020

FAO **Christie Burns**  
Planning Officer  
Development Management  
Copeland Borough Council

Dear Ms Burns,

Thank you for your letter dated 3 March 2020 advising that the Council had received amended plans for the above application.

The 'amended application' appears to consist of a letter between Fairhurst and the applicant's agent referring to issues raised by Cumbria County Council in their letter of 20 January 2020, but does not address material matters already raised by many stakeholders in the two previous rounds of consultation. I therefore attach my previous correspondences at the end of this letter which raise points relating to other material matters and request that these are made available to the Planning Panel.

With reference to the 20 January letter of Fairhurst:

**1) Fairhurst response to CCC Point 2 (No details to show there is spare capacity in the pipe to take the additional water)**

Fairhurst state that “the combined flows leaving the site have not been increased and as such there is no reduction in capacity pre and post“.

Unless the application is assuming rainwater harvesting (unlikely!) clearly any domestic property will require connection to a water supply and therefore significantly adds to the flows leaving the site and to potential environmental effects downstream. Using the method provided in the standard industry technical guidance “**British Water loads and flows**” (**Reference 1**) (as advised in the **2020 General binding rules: septic tanks and treatment plants (Reference 2)**) for standard residential use this estimates an additional 9000 litres per day, or **9 m<sup>3</sup> per day extra being put through the system** for a development of this size. This is clearly a significant additional load on the system.

*Reference 1) <https://www.britishwater.co.uk/code-of-practise-flows-and-loads-4-on-sizing-criteria-treatm.aspx>*

Reference 2) 2020 General binding rules: septic tanks and treatment plants. Environment Agency <https://www.gov.uk/permits-you-need-for-septic-tanks/general-binding-rules>

**2) Fairhurst response to CCC Point 3 “While the site is in flood zone 1 there is evidence of flooding of the roads and propert in the area...”**

Fairhurst can not be allowed to ignore the well documented cases of flooding the roads and properties. These cases are documented and well known to Cumbria County Council.

Since my email dated 19 January 2020 (Sender [redacted] - attached below) which detailed recent flooding events at this location, there has been further flooding of the B5344 at this location on 29 February 2020 which also flooded the bridlepath to the eastern boundary of the site preventing vehicular access to Netherby and our neighbours at Tamarisk. I attach a photo taken at 07.53 on 29 February 2020, (date stamped on my camera), there were taken a couple of hours after the rain had ceased and the water levels had abated from their peak level.



Yours sincerely

[redacted signature]

#####

**FAO Christie Burns**

19<sup>th</sup> January 2020

Your ref: 4/19/2240

FAO Christie Burns, Planning Officer, Copeland Borough Council

Dear Ms Burns,

## CONSULTATION WITH PLANNING AUTHORITIES

### ROAD NO B5344

#### PROPOSED OUTLINE APPLICATION FOR HOUSING INCLUDING APPROVAL OF ACCESS, LAND ADJACENT TO SOUTHERLY, DRIGG (AMENDED).

FOR MR [REDACTED]

With reference to the above amended consultation received on 2<sup>nd</sup> January 2020, and my response dated 28 July 2019.

Having read the amended documents I would like to raise the following points.

1. The revised application make **no attempt to address (or even mention) material matters** which were raised at a public meeting in Drigg Village Hall on 19 August 2019 at which the Applicant was present (though chose not to address the issues raised). A summary of the issues raised by residents were made available to the Applicant and have been provided to the Planning Department.

My remaining comments refer to the proposed drainage system.

2. The revised application provides **no evidence of permission being obtained from all downstream landowners** to discharge additional water. Common Law states that there is **no duty for the riparian owner** to accept extra water (arising from a development) or to improve the drainage capacity of a watercourse.
3. The revised application provides **no evidence of spare capacity in the downstream drainage system** (south of the B5344).
4. No up-to-date survey of the drainage system on the B5344 has been conducted. Camera surveys carried out in 2007 identified **obstructions in the pipe** which is likely to have degraded further over the years.
5. It has been reported by many interested parties that the proposed site floods frequently, it discharges both into the drainage along the side of Watery Lonning bridlepath (access to Netherby and Tamarisk) and into the drains on the B5344. This exacerbates flooding of bridlepath and the B5344 in periods of heavy rainfall. In addition the drainage system south of the B5344 is reported to overflow in periods of heavy rainfall. This evidence **proves that there is no spare capacity in the downstream drainage system**.
6. Heavy rain on 10 December 2019 caused both the field behind Southerly to flood, draining onto Watery Lonning which provides access to Netherby and Tamarisk. Photos (courtesy of a neighbour) are attached taken between 9am and 10am showing the flooded bridlepath approximately one foot deep. A photo is also provided showing water draining off the field into the drainage ditch which runs along the western side of Watery Lonning. When my husband and I returned from work at approximately 5 pm, Watery Lonning was again one foot deep in water causing us to have to park further up the road and wade through the water to get home. This is further evidence, if any is needed, of the unsuitability of the site for housing development due to pluvial flooding.
7. It should be noted that the applicant is the riparian owner, to the centre line of Water Lonning, including the drainage ditch running along its western side of Watery Lonning,



along the length of the boundary with Southerly and the applicant's field. It is therefore the applicant's duty to maintain this drainage ditch (watercourse) along this distance, i.e. from the intersection with the B5344 drainage system to near the entrance to Netherby.

In summary I request that the revised application should not be granted outline planning consent in its present form.

Yours sincerely

[redacted signature]



#####

28 July 2019

FAO **Christie Burns**

Dear Madam

**APPLICATION FOR OUTLINE PLANNING PERMISSION for up to 16 houses Land adjacent to Southerly, Drigg, Cumbria CA191XG Copeland Reference 4/19/2240/001**

Firstly, I object to this development on the grounds that

- This proposed development does not accord with the provisions of the Development Plan in force in the area in which the land relates is situated.

Furthermore I believe that the proposed development is not in accordance with the Interim Housing Policy 2017 (IHP) for the following reasons:

### 1 Principal of development

The Interim Housing Policy prioritises developments on the edge of existing settlements in sustainable locations. I object to the principal of development here on the following basis:

- This development is not on the edge of an **existing settlement (Figure 1a)**, and is a **significant intrusion into open countryside (IHP sub paras B and K)**
- It is not in a sustainable location due to the relative lack of **services and facilities in the settlement which will make car journeys more likely. (IHP sub paras B and E).**



Figure 1a Overhead view of location for planning application



**Figure 1b Location of the proposed development showing The Gables in the background**

The points regarding sustainability are expanded below:

### **Sustainability**

The only facilities in the village are the church and village hall, the Victoria Hotel, railway station and the Low Level Waste Repository (LLWR). LLWR contributes negligible employment within the village. Drigg lacks a school, a medical centre, chemist, hairdresser, hardware store and a convenience store (as defined in the Village Services Survey (2017)). The agricultural merchant / post office in Holmrook is **1.5 km** from the proposed development and the petrol station with a small grocery store is **1.9 km** from the development. It is unfeasible to assume that most residents would walk to access these facilities, especially taking into account the higher than average percentage of retirees living in the village.

The applicant has provided no update to the Village Services Survey therefore preference should be given to Seascale, Gosforth or Holmrook for such as development due to their size and available facilities. The proposed development will result in increased car journeys for employment, shopping etc on narrow roads which are not suitable (see remarks regarding **traffic pinch points**).

### **Transport links**

There is no footpath on the northern side of the road hence a **pedestrian crossing** would be required for safe access to other parts of the village.

It is unrealistic to assume high utilisation of the train station in preference to cars. On the occasions that I have used the train at Sellafield commuter hours I have only ever seen a maximum of 2 or 3 people using the railway station and frequently I have been the only passenger boarding the train at Drigg. On the occasion I have used the the Reays Sellafield commuter bus stops I have rarely seen anyone board or alight from it in Drigg.

I believe that applicant should have provided an up-to-date traffic count at the location.



**Figure 2 Linear settlement of Drigg showing:**

- a) Proposed development Ref 4/19/2240/001
- b) Approved Smithy Banks extension (Reference 4/18/2297/001)

## 2 Housing need

Drigg and Carleton parish has a population of 449 (according to the 2011 census). A development of 16 houses would increase the population by approximately 10 %, and is in addition to the 10-15 houses recently approved adjacent to Smithy Banks (Reference 4/18/2297/001 - **Figure 2**).

There is no proven requirement for additional housing. The nearby Low Level Waste Repository provides negligible employment within Drigg and has no advertised vacancies. The Moorside power plant project is halted with Toshiba winding up its NuGen business. The Sellafield Site is contracting as Reprocessing ends. There are approximately **5 houses standing empty** (ranging from small and large bungalows to

varying sized family / executive homes) currently within the village and more houses standing empty in Holmrook. Houses in Drigg are shown to take a year or more to sell.

There has also recently been an approved application for 15 houses at the other end of the village. (Your reference 4/18/2297/001).

- I object on the basis that there are no market areas where there are **identified needs** for housing in Drigg and therefore there are none for a development of this scale (**IHP sub para H**).

### 3 Visual Amenity

Drigg is an agricultural village with a **rural character** on the fringe of the **National Park** and the proposed development is a **significant intrusion into open countryside (Figure 2)**. The development will result in **significant and demonstrable harm** as it deviates from the traditional linear development along the B5344 by instigating major development in a non-linear fashion.

- I therefore object on the grounds that the **visual amenity** of the village will be damaged (**IHP sub paras G, J, K and L**).

### 4 Design

#### Scale and appearance – size, character and role of village

Drigg consists of traditional agricultural and historic building and has grown gradually over a couple of hundred years (see **figures 1 to 4**). **The development would detract from the rural style of the village** with its traditional buildings and would be detrimental to its character (illustrated in **Figures 1 to 4**) and particularly out of character with the adjacent historic house, **The Gables** (Figure 1a,b).

- I therefore object on the grounds that the **design** is inappropriate to the rural and traditional nature of the village which will therefore be harmed. (**IHP para J**).

### 5 Highway Safety and Access

The **road system is inadequate** to serve the additional traffic (an additional 30 plus cars plus 30 or more cars at the Smithy Banks extension development) being close to two traffic "**pinch points**" in the village, one at **St Peter's Church** and the other at **Drigg Hall** (see figures 1, 3 and 4). In addition it is close to a blind bend near the village hall (**Figure 5**) where there have been several near misses and where children play outside the village hall.



Figure 3 Traffic pinch point at St Peters Church / rural character of the village



Figure 4 Traffic pinch point at Drigg Hall / rural character of the village



**Figure 5 Blind bend next to village hall car park where children congregate and play / rural character of the village.**

I submit that there have been no traffic surveys in 10 years and request that a **traffic survey is commissioned** in the village which already has had an increase in traffic due to the private **bus commuter service to the Sellafeld** site operated by Reays, which runs every 20 mins through the village. There are already congestion issues in particular at the locations listed above and the proposed development would exacerbate these, as well as the congestion problems at the junction of the B5344 and A595 in Holmrook.

- I therefore object on the grounds that there will be a significant impact on the capacity and safety of the highway through Drigg (**IHP sub para C**).

## **6 Drainage and Flood Risk**

### **Pluvial flooding**

Having lived at [REDACTED] for over 16 years we have experienced pluvial flooding of the field which is the subject of this application, the B5344 and the lane leading to our house (known locally as "Watery Lonning". The application **omits mention of the water course which runs along Watery Lonning** and also discharges into the drainage system outside "Southerly". This drainage runs under the road and under properties on the south side of the road. This lane has flooded frequently during the time we have lived here, (up to a foot or more deep preventing vehicular access to Netherby and Tamarisk), and in times of heavy rain the B5344 itself has flooded impacting the properties in the vicinity (Southerly, Sabriyah, Colden). The proposed development would exacerbate the drainage issue since proposed plans are to discharge into the existing ineffective drainage system. The most recent occasion that the Watery Lonning flooded was on 30 July 2019, and was nearly one foot deep. Other recent occasions where Watery Lonning has flooded included 19 February 2018 (Figure 6) and 13 October

2018, Figure 7a and 14 October 2018, Figure 8. On these occasions the flooding prevented vehicular access.



**Figure 6 Most recent pluvial flooding on 30 July 2019 at Watery Loning, Drigg (adjacent to Southerly). Date stamped on camera**



**Figure 6 Flooding of "Watery Loning" 19 February 2018 (Date stamped on camera) over 1 foot deep - vehicular access prevented**





**Figure 7a Flooding on Watery Lonning 13 October 2018 (Date stamped on camera) over 1 foot deep - vehicular access prevented**



**Figure 8 Flooding in land to which the application relates on 14 October 2018 (Date stamped on camera)**

### **Flood risk assessment**

I have reviewed the Flood Risk Assessment report provided and checked the calculations presented in the Flood Assessment report using the standard SUDS / HR Wallingford tool which is freely available. Although not a drainage engineer, I am a numerical environmental modeller educated to PhD level, with over 20 years' experience providing consultancy to industry and local authorities. I currently work computationally modelling groundwater flow and contaminant transport. It should also be noted that the Guidance states that "The tool is designed to be used with a minimum of information by users who need not be drainage engineers"<sup>1</sup>.

The Flood Risk Assessment notes that the site area is approximately 1.3 hectares, however that only 0.42 hectares is to be made impermeable such that it requires formal drainage as a result of the development. This contradicts the SUDS Guidance which states "*The Greenfield runoff rate which is to be used for assessing the requirements for limiting discharge flow rates and attenuation storage for a site should be calculated for the whole development area (paved and pervious surfaces - houses, gardens, roads, and other open space) that is within the area served by the drainage network whatever size of the site and type of drainage system.*"<sup>2</sup>

Using default site specific input data and assuming a site area of 0.42 ha and an annual rainfall of 999 mm (value assumed in the Flood Risk Report) I reproduce the maximum Greenfield runoff rates to an acceptable degree (6.39 l/s versus the Fairhurst 2019 value of 6.22 l/s).

Assuming an annual rainfall rate more appropriate to the local area of 1075 mm (default value from the SUDS tool - however backed up by local Met Mast data) increases the discharge rate from 6.39 to 6.97 l/s. Assuming the full site area of 1.3 ha as per the SUDS guidance increases the discharge rate to 21.56 l/s. I attach my calculations separately.

Using the SUDS surface water storage tool to estimate the storage capacity required (as presented in the Flood Risk Assessment) is outside the capability of the tool, since the methodology requires the impermeable area to be more than 50% of the Area positively drained. No references or method have been provided for the storage capacity calculations provided by Fairhurst (2019) and is therefore unclear how the storage capacity of 257 m<sup>3</sup> to 405 m<sup>3</sup> is obtained by Fairhurst, 2019 or whether the method is suitable for the location in question.

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1

<https://uksuds.worldseuresystems.com/drainage-calculation-tools/surface-water-storage>

2

<https://uksuds.worldseuresystems.com/FAQRetrieve.aspx?ID=54989>

- I therefore object on the grounds that existing well document flooding issues which already impact neighbouring householders will be exacerbated by the development.

### **Additional Adverse Impacts on Stakeholders**

#### **Loss of Agricultural Land and adverse effect on the rural economy**

Having lived overlooking the land under consideration for over 16 years, I can confirm that it has been in constant agricultural use throughout this time, whether for grazing livestock or making hay.

There are 6 working farms (dairy and beef/sheep) within the boundaries of the village. The local farmers have already lost agricultural land due to the recent approval of the extension to the Smithy Banks housing estate (Reference 4/18/2297/001) at the Drigg / Holmrook boundary (**Figure 2**), which has approval for 15 additional house.

- I therefore object on the grounds of loss of additional grazing will have **impact on local farmers' livelihoods** and cause an **imbalance between jobs and homes**.



**Figure 8 Cows are moved along B5344 from different farms for milking several times a day in Drigg**

#### **National Park and England Coastal Path**

- I object on the grounds that the proposed development will have an adverse impact on the setting of the Lake District National Park (IHP sub para G).

Furthermore, the applicant has not demonstrated how development conserve or enhance the natural beauty, wildlife and cultural heritage of the setting of the Lake District National Park.

### **Landscape Character**

As illustrated in Figure 1 to 4, the bland modernity and scale of a development of this kind is incompatible with this part of Copeland.

- I object on the grounds that the bland modernity and scale of the proposed development will result in significant and demonstrable harm to the landscape character of this part of Copeland (IHP sub para L).

The applicants appear to have given no regard to the landscape as defined in the Cumbria Landscape Guidance and Toolkit.

### **Revised National Planning Policy Framework and Environmental Bill**

The application incorrectly states the site has a post and rail fence perimeter. As figures 1a,b demonstrate the site is bounded by hedgerows which would inevitably be removed thus affecting drainage, soil stability, wildlife habitat, atmosphere and appearance of the area. Being surrounded by hedges and greenfield land the location is inhabited by bats, owls (and other wild birds), deer and other species. The application also omits mention of the **water course which runs along Watery Lonning** (see section on surface water / pluvial flooding).

The revised National Policy Planning Framework (NPPF) states that planning decisions should benefit the natural and local environment by supporting and enhancing biodiversity. Furthermore, the forthcoming **Environment Bill** plans to **require developers to deliver biodiversity net gain, meaning that any development must leave habitats in a measurably better state than they had been in** beforehand.<sup>3</sup> **Any approved housing development application must contain conditions on the developers to assess the type of habitat and demonstrate how they are going to enhance biodiversity.**

### **Loss of private amenity**

A development of the scale proposed would result in loss of private amenity, Figure 1b illustrates the view from our house. Although screening planting has been provided around the applicant's house (Southerly) no planting has been provided to screen the houses adjacent to the site (The Gables to the west, Netherby and Tamarisk to the east

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3

<https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/>

and the bungalows on the B5344 which will suffer significant loss of privacy due to the topography of the site.

- I object on the grounds that my husband and I will suffer loss of private amenity and that the application should not be approved without a condition requiring **planting to screen neighbouring houses on 3 sides of the development.**

Yours faithfully

[REDACTED]  
[REDACTED]

[REDACTED]  
Drigg  
Holmrook  
[REDACTED]

15 /11/2020

Strategic Planning  
Copeland Borough Council  
The Market Hall  
Whitehaven  
Dear Sir / Madam

### Re Local Plan Consultation

Re Copeland Local Plan – classification of Drigg and Holmrook as a “cluster”

Dear Sir / Madam

Please find below part 1 of my response to the Local Plan Consultation, consisting of my OBJECTION to classify Drigg and Holmrook as a "cluster" and to the selection of sites for development outlined in the Local Plan and its underpinning documents. (Part 2 provided separately - objection regarding HDH1 - Land north of Meadowbrook.)

In summary:

- The settlement service scoring artificially inflates Drigg's score by overestimating the employment opportunities offered by LLWR and the services offered within Drigg – there is no shop selling day to day essentials, only a gift shop.
- The settlement service scoring underestimates Holmrook's score by omitting facilities (Greengarth) and underestimating the importance of other facilities (Riverside garage). Holmrook could be a Local Service Centre without being a “cluster” with Drigg
- Whatever research data (no reference provided by CBC) underpins Copeland BC's claim that people will walk for half an hour to reach a service” is generic and not applicable to the habits of the Drigg / Holmrook populations
- Application of Copeland BC's own criteria as stated in the Local Plan show that Drigg and Holmrook do not meet the criteria to be considered a “cluster”
- Copeland BC must apply the criteria stated in the Local Plan correctly, and not pick and choose to fit its own purposes (such as service scoring, walking times / distances to services, width and condition of pavements)
- Classification of Drigg and Holmrook as a cluster will have a disproportionate effect in terms of development in Drigg – as described in the Local Plan and sub documents.
- HDH1 site is unsuitable for the same reasons as adjacent “undeliverable” site DH3013, i.e.: biodiversity value, in open countryside, settlement character (The Gables) and known flooding issues. **I have addressed this point in more detail in a separate letter.**
- The protected “Green wedge” should extend west to incorporate The Gables and the majority of the HDH1 field.
- Drigg already has its own character and sense of place – that of a rural agricultural village – and does not require being turned into a “cluster” and having housing estates built to **“reinforce the sense of identity in the heart of the village”** (quote from Drigg and Holmrook Settlement Study) –the opposite is the case since a modern development would spoil Drigg's character and would turn it into another generic suburban sprawl.
- The minor benefits to Drigg PC of additional precept which would be raised if the village population was increased are far outweighed by the nuisance of additional traffic and loss of green field amenity.
- The main benefits to be gained from the proposal are to landowners profiting from selling land and businesses and to Copeland Borough Council – not to residents of Drigg or Holmrook

- Proximity of LLWR: Houses in Drigg historically and currently are slow to sell partly due to the proximity of the LLWR. In addition LLWR is a minor employer in the village, with only 2 known employees living within Drigg.
- There is NO lack of housing in Drigg and no proven need for additional housing.

I would like to expand on some of these points in further detail below.

### Disproportionate development of Drigg

The Settlement hierarchy and Development strategy Paper (1) clearly states the amount of additional housing each settlement classification is expected to deliver – a cluster, for example is expected to deliver more dwellings than a “sustainable rural village” or “other rural villages”. Yet at the Parish Council meeting (dated 3 November 2020 [REDACTED] from Copeland Borough Council is reported to have claimed that Drigg would receive the same amount of development irrespective of its classification. **This is misleading and directly contradicts the Settlement hierarchy and Development strategy Paper.** According to that paper, as part of a Local Service Centre cluster, Drigg on its own could receive a **minimum** of 20 % additional housing per year, whereas as (for example ) a sustainable rural village it should only be expected to deliver a **maximum** of 7 % per year.

Note that the Local Plan identifies development opportunities HDH1 and HDH2 – both of which fall within Drigg, Combining the number of houses in HDH1 and at HDH2 (Wray Head) will result in 54 new houses in Drigg alone – (within the newly defined boundary there are currently approx. 100 houses) **the proposed new housing would mean an increase by approx. 54%**, and thus increase in traffic.

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of housing by tier (2520/140pa)	Proportion/ amount of additional housing growth (1080/60pa)	Min/Max
Key Service Centres	Egremont		756 (42pa)	324 (18pa)	
	Millom				
Local Service Centres  Settlement/cluster which scores 15 points or more OR is well linked and physically connected to a Key Service Centre by a safe walking route and/or frequent public transport service	Seascale	25	20% 504 (28pa)	20% 216 (12pa)	Min
	Drigg & Holmrook	23 combined			
	Frizington & Rheda	22 combined			
	St Bees	20			
	Distington & Common End	18 combined			
	Haverigg	17			
	Arieedon & Rowrah	17 combined			
	Thornhill	16			
	Bigrigg	15			
	Cleator (linked to Cleator Moor)	7			
Sustainable Rural Villages	Beckermet	12	7% 177 (10pa)	7% 76 (5pa)	Max
	Ennerdale	12			

*Extracted from Table 11: Preferred development strategy: Housing Settlement hierarchy and Development strategy Paper*

[https://www.copeland.gov.uk/sites/default/files/attachments/development\\_strategy\\_paper.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/development_strategy_paper.pdf)

The village of Drigg currently has a population of **307** according to the village survey. Yet it is being put inappropriately in the same category as for example St Bees (pop. 1842), Seascale (pop. 2107) Frizington (pop. 2873), Distington (pop. 1670) etc.....whereas **Beckermet (pop 692) is in a lower settlement category (sustainable village despite having the same services score as Drigg)**. These villages are much better placed to absorb additional development due to their size than Drigg

which was previously classified as “Sustainable Settlement” in the “Copeland Interim Plan” and has had its settlement ranking artificially increased, with poor justifications given.

Categorising Drigg and Holmrook as a so called "cluster" will have the effect that Drigg receives a disproportionate amount of building development compared to its current population.

	for nearby villages.	
<b>Local Service Centres</b>	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.	Seascale
		Drigg & Holmrook
		Frizington & Rheda
		St Bees
		Distington & Common End
		Haverigg
		Arlecdon & Rowrah
		Thornhill
		Bigrigg
		Cleator (links to Cleator Moor)
<b>Sustainable Rural</b>	Settlements which offer a limited number of services	Beckermet

**Above extract from Copeland Local Plan, Page 47**

#### **Incorrect classification of Drigg / Holmrook cluster as a Local Service Centre**

*“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.”* (Local Plan P47 Policy DS2PO: Settlement Hierarchy) – see extract below.

In classifying Drigg and Holmrook as a “cluster” the Local Plan assumes that inhabitants will walk from their homes to the services along a 2 metre wide footpath (section 12.2.9):

	compared to 14 at present.
12.2.8	The preferred hierarchy also recognises that settlements do not operate in isolation and where two or more settlements are connected to safe, accessible walking routes of less than a mile and/or a frequent bus or train service, they have been grouped together as a cluster. This has resulted in some settlements featuring within a higher tier than they would have done if the hierarchy was based on services within that village alone.
12.2.9	A safe walking route is one that has street lighting and a continuous pavement that is at least 2m wide. A frequent bus or train service is one that would allow a village resident working standard office hours (9am-5pm) in a nearby town to travel there and back by public transport. When considering train links, the distance from the station to the main settlement and the safety of the route was also considered. For example, whilst The Green benefits from a regular train service to Millom, the station is over a mile away from the main settlement and the route to the station is not considered to be safe, lacking a pavement and lighting in parts.

**Above extract from P 46 of Copeland Local Plan**

The services are located at opposite ends of a line (the distance from Drigg station / Spindle Craft shop to the A595 / B5344 junction is 1.81 km, and Holmrook petrol station and Tynedale / Riverside are 750 m apart in opposite directions). For a settlement to function as a service provider which



people access by foot, the services would need to be “clustered” – i.e. the services should be grouped together for pedestrian access - not separated at polar opposite ends of the village!  
 Footpath width and condition – it is well known the pavement in many stretches along the B5344 is narrow – **less than one metre** and is discontinuous at several locations. This does not meet Copeland BC’s stated criteria in the Local Plan.

**Photos below show some (but not all) examples of pavements LESS THAN ONE METRE WIDE – Local Plan uses 2 metres as a criteria – section 12.2.9 of Local Plan**

	
<p><b>Above –B 5344 at St Peter’s Church – pavement less than ONE METRE wide</b></p> <p>It is easy to stumble into the road at this point as the pavement is less than one metre wide. Road is narrow - large milk tankers and commuter coaches are too close for comfort!</p>	<p><b>Above – B5344 opposite Hill Green Farm – pavement is less than ONE METRE wide</b></p>



**Above -B5344 near Drigg Hall pavement less than ONE METRE wide**

It is easy to stumble into the road at this point as the pavement is less than one metre wide. Road is narrow - large milk tankers and commuter coaches are too close for comfort!



**Above - B5344 at bottom of Holmrook Hill / junction of A595 – steep slippery and discontinuous pavement less than ONE METRE wide**

Pavement on right hand side of road usually blocked by parked cars



**Above -Old Shore Road (between Drigg Station / Victoria Hotel and B5344) pavement less than ONE METRE wide**



**Above - B5344 west of HDH1 site – narrow and sometimes blocked pavement**

### **Inappropriate use of generic habit survey data**

What data is the assumption that people in Drigg / Holmrook will walk a mile to facilities based on? Is the claimed research based on generic data, biased by location (eg city where there are more services in one place to access in that one mile walk) or population (students – young and without a car)? The claimed un-referenced research does not fit the habits of Drigg and Holmrook!

Most of the services in Drigg and Holmrook are used by people driving past on the A595 or driving into Drigg from outside (eg the Craft Shop. Farmers drive to Tynedale agricultural store from a wide area to buy animal feed etc. Older people / people with mobility issues are unlikely to walk down the steep, slippery Holmrook hill with its narrow pavement. Car owners drive to the garage for car repairs – they can not carry their car! People drive to use the village hall facilities –the car park being full when there is an event being held. People drive to Holmrook petrol station to buy their newspaper. In general they do not walk. The craft shop at the station sells crafts and gifts, it does not sell groceries or produce that people use on a day to day basis. As such it's trade mainly depends on people driving there from outside of the village. Drigg has no playpark – children should not be expected to walk from Drigg and have to cross the busy A595 to access the playpark in Holmrook.

Some people may walk on a sunny day for exercise – not to use a facility. As an example I am fit and active – I believe I have walked to Holmrook petrol station twice this summer– but drive weekly to buy a newspaper. For grocery shopping I will drive to Seascale or Egremont since I can not buy my shopping in Drigg/Holmrook. Increase in traffic will reduce pedestrians walking in the village for exercise / leisure– they will drive somewhere instead such as the beach, and add further to the traffic.

The Settlement service scoring for Drigg (Settlement hierarchy and Development strategy Paper - Copeland Council 2020) artificially increases Drigg's settlement score by over emphasising the value of LLWR employment in the village. It has score of one for shop – however the only shop in Drigg is a craft shop selling gifts but not day to day shopping and should not be included.

The scoring underestimates the score of Holmrook by not taking account of the employment opportunities of the garage and omitting Greengarth business park. Due to its population, location (on A595) and available services Holmrook could be classified a Local Service Centre without being in a cluster.

**The criteria that services may be accessed within a mile by 2 m wide pavement is not met in Drigg / Holmrook. The Copeland Planning department must stick to the facts and their stated criteria and must not change the criteria in order to open the doors to inappropriate development.**

### **Settlement Character of Drigg and sense of place**

Drigg and Holmrook are two separate villages, with their own identities and their own focal points – each have their own village halls and pubs and village activities. Drigg and Holmrook do not operate as a “cluster”.

The proposed developments as outlined in the Local Plan will ruin the character of Drigg as a rural farming village.

Drigg already has its own character and sense of place – that of a rural agricultural village – and does not require being turned into a “cluster” and having housing estates built to “**reinforce the sense of identity in the heart of the village**” (quote from Drigg and Holmrook Settlement Study) –the opposite is the case since a modern development would spoil Drigg’s character and would turn it into another generic suburban sprawl.

The minor benefits of additional parish precept which would be raised if the village population was increased are far outweighed by the nuisance of additional traffic and loss of green field amenity.

The Local Plan selects **The Lutwidge Arms, Cloudbase** and the **church complex** as the notable buildings in the village. The Church complex is protected within a “green wedge”. **Why does it**

**miss out The Gables which is adjacent to “HDH1” and is of a similar non designated settlement character to the church complex which is protected?**

Why is **Drigg Hall** (see below) also omitted from the selected notable buildings in the village?



**Drigg Hall and stretch of pavement less than ONE METRE wide.**

It is easy to stumble into the road at this point as the pavement is less than one metre wide. Large milk tankers and commuter coaches are too close for comfort!

## **Areas identified in Copeland Local Plan as “developable” - HDH1 / DH004.**

I also attach a separate letter concerning HDH1 however I would like to emphasise some of the points below

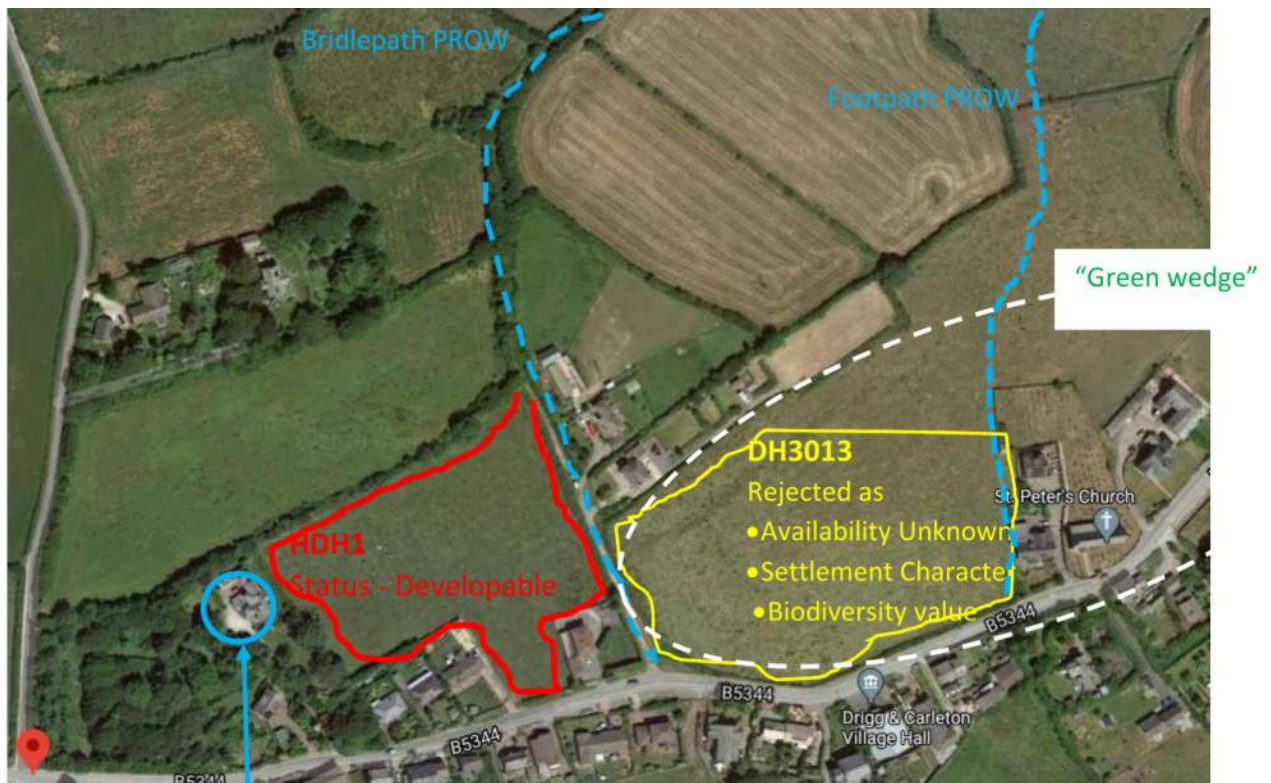
**HDH1** has been the subject of a planning proposal (PP-07930856 - LAND ADJACENT TO “SOUTHERLY”, DRIGG, application for up to 16 houses). This has been the subject of considerable local opposition for over 12 months due to the proposed development being unsuitable for many reasons in particular it would exacerbate a well-known flooding issue. To date the County Highways department are unable to support this development due to the flooding.



**Location of HDH1.**

**PHOTOGRAPH TAKEN OUTSIDE HDH1 (DH004) ILLUSTRATING THE RURAL AGRICULTURAL NATURE OF THIS LOCATION**

**HDH1 – Why is HDH1 considered Developable yet is has the same material characteristics as adjacent DH3013 is considered Undeliverable?**



← HDH1 site overlooked by "The Gables" – visible from B5344, bridlepath PROW and footpath PROW. Settlement character is comparable to the Church complex which is protected from development

Figure showing "green wedge" (white dashed line), HDH1 site identified as "developable" (red) and DH3013 site identified as "undeliverable" (yellow). HDH1 site ringed in blue

The "green wedge" should be extended west to include the Gables and the bulk of the HDH1 field since this is surrounded by open countryside and to protect the settlement character of The Gables.

**HDH1 is:**

- In open countryside
- Biodiversity value - surrounded by hedges and adjoined to woodland to west – has more natural habitat than adjacent Rejected site DH3013
- Settlement character - adjacent to historical house "The Gables" –visible from B5344, bridlepath PROW and footpath PROW running across field from B5344 adjacent to Church (blue dashed lines)
- Existing problem with flooding – at present Highways Department oppose development for 16 houses

**From:** [REDACTED]  
**Sent:** 04 February 2022 09:33  
**To:** Local Plan Consultation  
**Cc:** [REDACTED]  
**Subject:** Copeland Local Plan 2021-2038 Publication Draft of the Local Plan Consultation (January2022)  
**Attachments:** DRIGG\_CLUSTER\_local\_plan\_objection\_[REDACTED].pdf; HDH1-DH004\_Local\_Plan\_Objection\_[REDACTED].pdf; IHP comments23aug.pdf; MINUTES FROM THE PUBLIC MEETING HELD IN DRIGG VILLAGE HALL ON 19 AUGUST 2019.pdf  
**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

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 Please report any suspicious email to our [IT Helpdesk](#)

FAO Strategic Planning Team  
 Copeland Borough Council  
 The Market Hall  
 Market Place  
 Whitehaven  
 Cumbria CA28 7JG

Dear Sir/Madam

With respect to the changes to the Local Plan in the January 2022 Publication Draft - thank you for taking on board my comments in my responses to the previous drafts (attached below).

I am very pleased that the former HDH1 site (behind Southerley / Meadowbrook) has been removed from the settlement area and is now outside the settlement boundary, for the reasons stated in my previous responses (below).

I am also very pleased that Drigg and Holmrook are now classed as Sustainable Rural Villages and not combined as a Local Service Centre (cluster), for the reasons stated in my previous responses (below).

I note that part of the field adjacent to Smithy Banks has now been brought within the settlement boundary (Land at Bowrie Fauld, west of Smithy Banks, Holmrook - Application 4/21/2534/0o1 outline residential application for residential development). I object to this land bring brought within the settlement boundary for the following reasons:

1) This land has been brought within the settlement boundary due to 4/21/2534/0o1 outline application for residential development. Application 4/21/2534/0o1 replaces the lapsed 2018 planning permission which was only possible due to the 2017 housing supply failure. Due to various plots being subsequently made available for development, there is now no housing supply failure either in the Drigg / Holmrook area or in the wider Copeland.

2) No evidence of a housing shortage in Drigg / Holmrook has been identified in application. There is one site allocated for housing in Holmrook HDH3 - Hill Farm and another site nearby in Drigg (HDH2 - Wray Head, Station Road).

3) The proposed development nibbles away at the green belt which separates Drigg and Holmrook, which are small individual rural settlements with an agricultural identity, and would leave only a narrow margin of agricultural land separating the two settlements. This would effectively turn Holmrook / Smithy Banks / Hill Green into one large housing estate, destroying their individual identities..

4) The location is not sustainable development since it will increase traffic use due to a poor rural transport provision in the area. This is unacceptable given that Copeland BC's 2020 Climate and Environment Policy recognises the need to "consider climate change holistically and not in isolation from strategic activities relating to the economy , environment and public health". The proposed development also contradicts the aims of the Zero Carbon Cumbria

Partnership which is "working towards the shared aim of making Cumbria the first carbon-neutral county in the UK, by 2037"

Yours faithfully

[Redacted signature]

----- Forwarded message -----

**From:** [Redacted]  
**To:** Localplanconsultation@copeland.gov.uk <localplanconsultation@copeland.gov.uk>  
**Cc:** [Redacted]  
**Sent:** Saturday, 16 October 2021, 17:11:13 BST  
**Subject:** Copeland Local Plan 2021-2038 Focused Pre-Publication Draft Consultation (October 20210

FAO Strategic Planning Team  
Copeland Borough Council  
The Market Hall  
Market Place  
Whitehaven  
Cumbria CA28 7JG

Dear Sir/Madam

**With regard to the Drigg settlement boundary:**

I am pleased to note that the HDH1 (field adjacent to "Southerly") has been removed from the plan as a "developable" site, citing "*Issues surrounding landscape character and surface water*" (Table 4: Allocations removed/amended in the Local Plan) - these issues have been pointed out to Copeland planning team by numerous Drigg residents. However, Map 7 (from page 43 of the September 2021 document "Copeland Local Plan 2021- 2038 Focused Pre- Publication Draft Changes Consultation") **indicates that the HDH1 field been left within the settlement boundary**. At the core of the Local Plan there is a "Presumption of Sustainable Development" policy within the settlement boundary - since the HDH1 field still lies within the settlement boundary it suggests that this field would be presumed suitable for development if no significant objections were received from statutory consultees to any potential proposed development application. Given that substantial opposition was received in response to the previous applications to develop this field, for many reasons other than the flooding issues in this area, and as detailed in my previous submissions (attached), **I believe that the former HDH1 field should be removed from within the Drigg settlement boundary** .

Please see map below, black dashed line indicates the location of the settlement boundary as indicated on Map 7 of page 43 of the September 2021 document "Copeland Local Plan 2021- 2038 Focused Pre- Publication Draft Changes Consultation"

The red dashed line indicates where I propose that the amended settlement boundary should lie in order to prevent a presumption of development in the former HDH1 location.



**With regard to the classification of Drigg & Homrook as a "cluster" / local service centre:**

**I still object to the combination of Drigg&Holmrook as a cluster and Local Service Centre for the reasons details in my correspondence dated 23 November 2020 (attached below):**

The October 2021 revision appears to have taken no account of local knowledge that pointed out that the distances between people's home and services largely and sometimes significantly exceeds both the stated desirable and the maximum times and distances set in the Local Plan for determining a settlement's place in the expanded hierarchy that the Local Plan proposes. See excerpt from email (dated 30 November 202 from [REDACTED] to the Copeland Local Plan consultation email address) . The email cites a survey undertaken by a Drigg community action group related to walking times and distances:

*With regard to our survey, we received 47 completed replies. A further 11 replies were not fully completed and the data has not been provided. Residents of Holmrook provided 20% of the responses. The rest were provided by residents of Drigg or the surrounding countryside.*

*The distance between one end of Drigg and the other is 1.5 miles (30 mins walk) according to Goole Maps. From one end of Drigg to the other end of Holmrook is 2 miles (40 mins walk) . The survey therefore focussed on people's understanding of actual times and distances from their home to service locations, since these add to the evidence based justification for classifying a Cluster Local Service Centre. In our opinion the headlines from the survey are as follows:*

*a. 85% of respondents rarely or never walk to the Filing Station and the co-located Convenience store but 80% sometimes or frequently drive there. Comment: This is probably because the primary function is the sale of vehicle fuel, compounded by the distance of the facility from Drigg. The store, which is located on the A595 outside the village and in the Lake District National Park, largely serves passing business traffic and tourism locations in Wasdale and Eskdale.*

*b. Only two people frequently walk to the Railway Station, with its collocated craft/coffee shop and pub. Comment: This probably indicates that there is no one using Drigg and Holmrook's only public transport provision to commute daily to work.*

*c. Comment: Few people say they walk to any service that is over half a mile from their home and some observe that the journey is almost always two way and therefore double the distance and time reported.*

*d. Comment: The estimates of the time taken for individuals to walk from home to a service varies considerably, with some remarking on the significance of their age and health as a factor.*

The revised local plan has also ignored the fact that the pavement in many stretches along the B5344 between Drigg and Holmrook is narrow – **less than one metre and is discontinuous at several locations. This does not meet Copeland BC's stated criteria in the Local Plan.** Photographic evidence of the unsuitable pavements is attached in my previous submission (attached below).

I still believe that whatever research data (no reference provided by CBC) underpins Copeland BC's claim that people will walk for half an hour to reach a service" relies on generic habit data and not applicable to the habits and demographics of the Drigg / Holmrook populations.

There is NO lack of housing in Drigg and no proven need for additional housing.

Any new housing developments in Drigg would create nuisance due to additional traffic and loss of green field amenity, significantly increasing the village's carbon footprint. This is in contradiction to Copeland B.C.'s "Policy ST1 – Strategic Development Principles" to be environmentally sustainable, and is completely irresponsible in a Climate Emergency.

In summary

**1) I believe that the settlement boundary should be moved such that the former HDH1 field lies outside of the Drigg settlement boundary**

**2) I still OBJECT to the combination of Drigg&Holmrook as a cluster and Local Service Centre for the reasons details in my previous correspondence (attached).**

Please add my contact details to your consultation database so I can be kept informed regarding developments regarding the Local Plan.



Yours sincerely

----- Forwarded message -----

**From:** [REDACTED]  
**To:** LocalPlanConsultation@copeland.gov.uk <LocalPlanConsultation@copeland.gov.uk>  
**Cc:** [REDACTED]  
**Sent:** Monday, 23 November 2020, 11:41:23 GMT  
**Subject:** Local Plan response

Dear Sir / Madam

Please find attached my responses to the Local Plan consultation.

My response is submitted in 2 parts:

Part 1 - Objection to Drigg / Holmrook classification as a cluster and inappropriate development  
Part 2 - Objection to HDH1 "deliverable" site (and 2019 planning application for this site "land adjacent to Southerly" 4/19/2240/001)

In summary

- The settlement service scoring artificially inflates Drigg's score by overestimating the employment opportunities offered by LLWR and the services offered within Drigg – there is no shop selling day to day essentials, only a gift shop.
- The settlement service scoring underestimates Holmrook's score by omitting facilities (Greengarth) and underestimating the importance of other facilities (Riverside garage). Holmrook could be a Local Service Centre without being a "cluster" with Drigg
- Whatever research data (no reference provided by CBC) underpins Copeland BC's claim that people will walk for half an hour to reach a service" is generic and not applicable to the habits of the Drigg / Holmrook populations
- Application of Copeland BC's own criteria as stated in the Local Plan show that Drigg and Holmrook do not meet the criteria to be considered a "cluster"
- Copeland BC must apply the criteria stated in the Local Plan correctly, and not pick and choose to fit its own purposes (such as service scoring, walking times / distances to services, width and condition of pavements)
- Classification of Drigg and Holmrook as a cluster will have a disproportionate effect in terms of development in Drigg – as described in the Local Plan and sub documents.
- HDH1 site is unsuitable for the same reasons as adjacent "undeliverable" site DH3013, i.e.: biodiversity value, in open countryside, settlement character (The Gables) and known flooding issues.
- The protected "Green wedge" should extend west to incorporate The Gables and the majority of the HDH1 field.
- Drigg already has its own character and sense of place – that of a rural agricultural village – and does not require being turned into a "cluster" and having housing estates built to "**reinforce the sense of identity in the heart of the village**" (quote from Drigg and Holmrook Settlement Study) –the opposite is the case since a modern development would spoil Drigg's character and would turn it into another generic suburban sprawl.
- The minor benefits to Drigg PC of additional precept which would be raised if the village population was increased are far outweighed by the nuisance of additional traffic and loss of green field amenity.
- The main benefits to be gained from the proposal are to landowners profiting from selling land and businesses and to Copeland Borough Council – not to residents of Drigg or Holmrook
- Proximity of LLWR: Houses in Drigg historically and currently are slow to sell partly due to the proximity of the LLWR. In addition LLWR is a minor employer in the village, with only 2 known employees living within Drigg.

- There is NO lack of housing in Drigg and no proven need for additional housing.

**HDH1 site / "land adjacent to Southerly" 4/19/2240/001**

A public meeting was held in Drigg Parish Hall on 19 August 2019 to discuss the Southerly planning application (known as HDH1 in Local Plan) which was attended by 33 members of the public, including the applicant (a record of names / addresses of attendees has been kept). This meeting resulted in a set of minutes and a spreadsheet review of the planning application when assessed against criteria listed in the national framework guidelines and Copeland BC's interim housing policy. The criteria were scored according to the following scale: -2 (strong disbenefits) -> 0 (neutral) - > 2 (strong benefits). The record of comments against each criteria from the public meeting are provided in the attached files:

IHP comments23aug.pdf;

MINUTES FROM THE PUBLIC MEETING HELD IN DRIGG VILLAGE HALL ON 19 AUGUST 2019.PDF

Yours faithfully

A redacted signature consisting of a thick, irregular red brushstroke covering the name of the signatory.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 February 2022 09:57  
**To:** Local Plan Consultation  
**Subject:** Drigg and Holmrook revised plan

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

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Dear Planning Team,

I am writing to express my huge relief that Drigg and Holmrook have now been reclassified as sustainable rural villages rather than a 'well connected cluster'. This is so much more appropriate for the communities in question. I also very much welcome the decision to place the field behind Southerly outside the settlement boundary. This is a greenfield site which should not be surrendered to development.

However there are still a few aspects of the revised plan which I consider to be very undesirable. In particular I would hate to see development of any part of the field adjacent to Smithy Banks, as this would blur the distinction between Drigg and Holmrook which are clearly and historically two separate villages, and should remain so.

Yours faithfully,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 March 2022 08:13  
**To:** Local Plan Consultation  
**Subject:** Response to changes to the local plan for Drigg and Holmrook

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Dear Local Plan Team,

As a local resident I am writing to reiterate my immense relief that Drigg and Holmrook have been reclassified as two separate sustainable rural villages and not as a 'well connected cluster', which would have potentially ruined the character of both, and indeed of the whole area.

In particular I am pleased to see that the field behind 'Southerly' is now outside of the settlement boundary. This should remain as a green field site.

However, I note that part of the field behind Smithy Banks has still not been placed outside the settlement area. It should not be developed under any circumstances, as it constitutes much of the green belt between the two villages.

Likewise the field at the head of Station road must remain outside the boundary, and not be developed, for the same reason. It would start to fill in the gap between Drigg and Stubble Green, and houses here would ruin the beautiful view for everyone walking/driving/cycling from Seascale to Drigg.

Although not the subject of this particular consultation, I would furthermore wish to state categorically here that I am utterly opposed to the idea of a GDF nuclear waste site or surface facility being built anywhere between Ravenglass and Sellafield and the fells. This would be a disaster from every possible viewpoint.

Yours sincerely,

[REDACTED]

Dear Sir/Madam

I am writing to you regarding the updates to the Local Plan in the January 2022 Publication Draft. It was very comforting to see that the comments previously made were all considered and documented with a response.

Due to changes I would like to draw to your attention the following: -

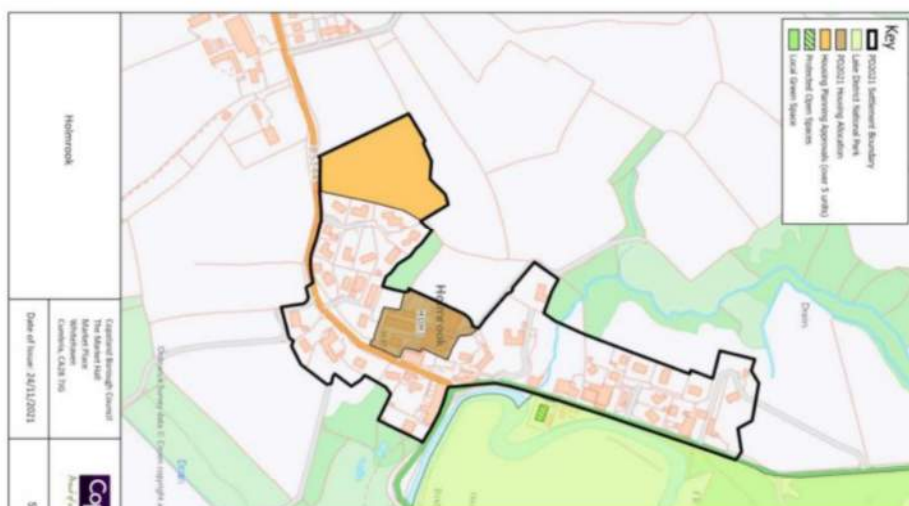
The Land at Bowrie Fauld, west of Smithy Banks, Holmrook is shown to be within the settlement boundary on this draft of the plan, highlighted in yellow on the map below, however the planning permission for that development lapsed in December 2021. Application 4/21/2534/0o1 outline residential application for residential development is a resubmission of this development. This parcel of land is currently outside the settlement boundary and should remain so, I object to it being included within the settlement on the following grounds: -

- 1) The original planning permission was only possible due to the 2017 housing supply failure as the site is a greenfield site that does sit outside the current settlement boundary.
- 2) The proposed development drastically reduces the green field space separating Drigg and Holmrook, leaving only a very narrow strip of agricultural land separating the two settlements.
- 3) There is now no housing supply failure either in the Drigg / Holmrook or indeed now in the wider Copeland area
- 4) This is not sustainable development and would increase the carbon footprint due to lack of transport provision and services in this rural area - contradicting the aims of the Zero Carbon Cumbria Partnership which is "working towards the shared aim of making Cumbria the first carbon-neutral county in the UK, by 2037"

I do support the following area for development within Holmrook, as it is deemed more appropriate being a brown field site, already within the settlement boundary:-

- Holmrook HDH3 - Hill Farm - brownfield site – also indicated below (HDH3)

Holmrook settlement boundary map showing HDH3 and land (yellow) adjacent to Smithy Banks brought within settlement boundary:





I fully support the fact that the former HDH1 site (behind Meadowbrook/ Southerley) has now been moved outside of the settlement boundary for very valid reasoning some of which were noted in my previous responses.

I also fully support that Holmrook and Drigg are going to be classed as Sustainable Rural Villages and not combined as a Local Service Centre (cluster), as per my previous responses to the last Copeland Local plan.

Kind regards

[Redacted signature]

13-02-2022

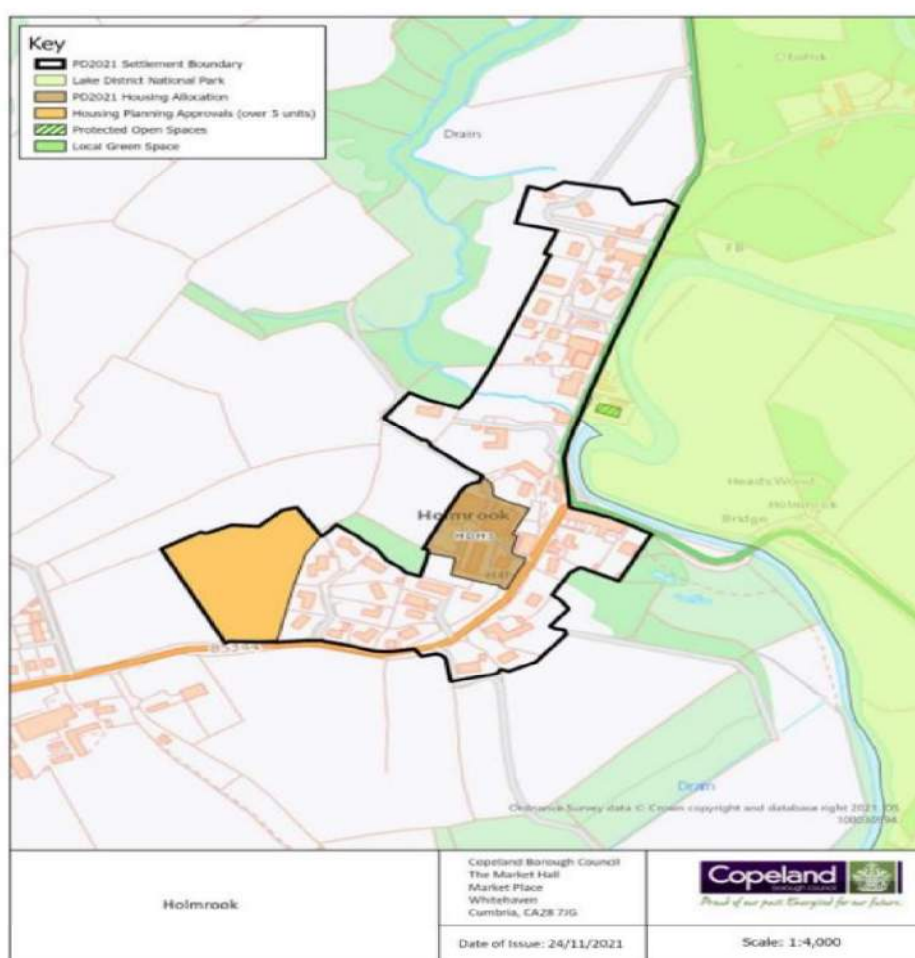
Dear Sir/Madam

We are writing re the Draft Copeland Local Plan that was released for comment in January 2022.

In particular, the fact that the settlement boundary of Holmrook has been altered to include part of the field adjacent to Smithy Banks (Bowrie Fauld) which was previously outside of the settlement boundary. Figure pasted below. This field has only been included within the settlement boundary due to it gaining outline planning permission previously. This permission lapsed in December 2021 and therefore this is no longer valid (Application 4/21/2534/0o1 outline residential application for residential development is a resubmission of this development).

We object to the Land at Bowrie Fauld, west of Smithy Banks being brought into the settlement boundary on the following grounds: -

1. There is no current valid planning permission on this site it should be removed from within the settlement boundary.
2. The planning was only passed originally due to the 2017 housing supply failure – this is no longer a valid reason as there is no longer a housing shortage with other more appropriate plots of lands being put forward.
3. It is a green field site utilised for agricultural purposes (still) as I am currently the sitting tenant
4. There is also one site listed as allocated for housing in Holmrook HDH3 - Hill Farm which is a brown field site which should be developed prior to a greenfield site.
5. It drastically reduces the green space between Holmrook and Drigg villages, nearly cojoining villages and leaving only a small sliver land between the two.
6. The site floods, numerous times a year, impacting the houses down the lane opposite the farm (Groundy Farm Lane).



Supported is the fact Holmrook and Drigg is now listed as Sustainable Rural Villages as per many responses received by the residents of both villages.

Also noted and supported is that the field behind Southerly which was previously within the settlement boundary is now outside of the Settlement Boundary

Please take this into account for all residence in this household.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Many thanks

[Redacted]



**From:** Ellie Church  
**Sent:** 21 February 2022 10:25  
**To:** Local Plan Consultation  
**Subject:** FW: Local plan

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Ellie Church  
 Strategic Planning Officer  
 Copeland Borough Council  
 01946598496  
 07385362770  
 Ellie.church@copeland.gov.uk  
 Copeland Borough Council, The Copeland Centre, Catherine Street, Whitehaven, Cumbria, CA28 7SJ. Tel: 01946 598300. Fax: 01946 598303. www.copeland.gov.uk, info@copeland.gov.uk

-----Original Message-----

**From:** [REDACTED]  
**Sent:** 21 February 2022 10:09  
**To:** Ellie Church <Ellie.Church@copeland.gov.uk>  
**Subject:** Local plan

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Dear Sir/Madam

I would like the following comments to be taken into account with regard to the final draft of the Local Plan for Copeland.

Drigg and Holmrook which were previously included as a Local Service Centre, are now classed as Sustainable Rural Villages. According to council policy, open space should be maintained between rural villages which I whole heartedly support to retain the individuality of each village.

I would also like to thank Copeland Borough Council for removing Southerly field Drigg, which is now outside the settlement boundary. Drigg has identified the area of Wray Head for future housing development.

The area of concern to me is the boundary change at Holmrook, which includes part of the field adjacent to Bowrie Fauld, Smithy Banks. This was previously outside the settlement boundary and was granted outline planning

permission whilst the Local Plan was in the process of being formulated. This outline planning has now expired, therefore the area should revert to the councils policy of maintaining open space between Sustainable Rural Villages.

Development of this site would effectively join the villages of Drigg and Holmrook together, with the boundary of the property known as Cloudbase, Drigg being on the edge of Drigg overlapping the proposed Bowrie Fault, Holmrook development.

This site is green field agricultural land and the Local Plan states (soils contamination and land stability 6.7.3) Such land should be protected from development and maintained for agriculture.

Holmrook has identified a brown field site at Hill Farm for housing development which should be given priority over a green field site. I would therefore appreciate the council reviewing this area of the Local Plan.

Yours Sincerely

A solid red horizontal bar used to redact the sender's name.

Sent from my iPad

Sent from my iPad

## Copeland Local Plan 2017 – 2035 Preferred Options Draft September 2020

### Comments:

8.1.2 Positive recognition to promote Whitehaven Historic Harbour & Georgian Gem Town. This should be the primary focus of the Local Plan.

12.2.7 Identified hierarchy of 3 tiers of Village classification is a positive.

13.1.9 Improved link between Whitehaven Town Centre & the Harbourside will merge the degraded area of King Street with the appeal of the Harbour.

Improved sports facilities are a clear gain.

13.1.10 Development of brownfield sites should be stipulated as a priority over greenfield.

15.2.6 / 16.4.1 Drainage Infrastructure / Tree Planting. Should make it a mandatory requirement that all new developments have to be accompanied by semi-mature trees to be planted on the verge side of each property.

21.4.3 Positive statement to potentially remove the Westlakes restriction from just technology facilities.

21.8.1 Homeworking. Should stipulate to work closer together with our Nuclear partners for town centre buildings to be occupied by nuclear workers. To remove Sellafield congestion & help town centre businesses etc.

Old Trades Hall Building.

Old Main Post Office.

Whitehaven News Office etc.

32.3.6 Whitehaven Future High Street Funds & the list of Town Centre opportunities is a positive.

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

23<sup>rd</sup> Feb 2022