

**Supporting Planning, Design &
Heritage Statement**

**Croft End Farm, Nursery Road,
Beckermeth, CA21 2XG**

**Outline Planning Application for up to
5 units with Access defined with
associated infrastructure and
ancillary facilities**

June 2021

**Statement prepared by:
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**On behalf of Mr John Hodgson and
family**

**For and on behalf of John Hodgson
and family**

Supporting Statement

**Croft End Farm, Nursery Road,
Beckermet**

June 2021

Ref: 2020-48b

Approved by:

Russell Adams - Director

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1.0 Introduction

- 1.1 This statement has been prepared by Adams Planning + Development Ltd (APD) on behalf of the landowners, John Hodgson and family.
- 1.2 This statement has been prepared in support of an Outline Planning Application for the following form of development:
- “Change of use and conversion of agricultural barn and associated farmyard to provide the phased delivery of up to 5 no. self, custom or developer built residential dwellings with associated infrastructure and ancillary facilities - in Outline with Access defined.”***
- 1.3 This planning application comprises of a full suite of submission plans and documentation that serve to demonstrate the acceptability and deliverability of the above-identified development proposals and comprises of the following documentation:
- A Covering Letter – Adams Planning + Development
 - Planning Application Forms & Certificates
 - A Site Location Plan
 - Existing Site Plan
 - Indicative Site Layout Plan
 - This Supporting Planning Statement
 - Ecology Report & Bat Survey
- 1.4 This Planning Statement provides a summary of the development proposals and the additional supporting information that has been collated in order to evidence the appropriateness of the proposed residential development of up to 5 residential units.

Background

- 1.5 APD were instructed to approach PFK local Estate Agency and Chartered Surveyors for advice on the most appropriate type of housing for the site at the outset, in order gain a clear understanding of the market demand and housing need for the area. PFK have a long and proven track record of both past and current house sales in Beckermat and the immediate area.
- 1.6 PFK confirmed that, whilst there has been recent planning consents for smaller residential units in Beckermat, there is a shortage of smaller, bespoke and potentially self-build units within Beckermat. The Applicants were advised that the shortage of larger family-sized units coupled with the attractive traditional stone barn and village centre location make the site particularly well suited to deliver a small number of large residences, including the conversion of the barn into two dwellings with two or three new detached dwellings to the rear.
- 1.7 It was advised that, in light of the Applicant not wishing to build the residences themselves, it is most appropriate to submit an Outline Planning Application with the primary access defined, with this approach offering the Applicant the potential to deliver either serviced self-build plots, self-build plots for people wishing to design and build their own home, and/or selling the whole of the site to a local housing developer to deliver high end bespoke residences.

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- 1.8 APD were subsequently instructed to approach Wright Design Partnership that have extensive experience of delivering conversions and residential sites in Copeland Borough Council, the wider Cumbria and North West area of England.
- 1.9 APD submitted a pre-application consultation to Copeland Borough Council in order to inform the planning approach, scale and layout of the development proposals, with this submitted Outline Planning Application fully responding to the advice received whilst also offering the necessary flexibility required to ensure the future residential developer can deliver an appropriate scale and form of development at the subject landholding.

Planning History

- 1.10 There is no planning history relating to the subject landholding.

2.0 Consultations

- 2.1 Copeland Borough Council's Statement of Community Involvement (September 2016) and the Revised National Planning Policy (NPPF, July 2018) encourages pre-application discussions on all planning applications, and Paragraphs 39 to 42 of the NPPF stresses the benefits of pre-application consultations, advising that:

"Good quality pre- application discussion enables better coordination between public and private resources and improved outcomes for the community...The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits... The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage."

- 2.2 A pre-application consultation was submitted to Copeland Council in January 2021. The Council's pre-application advice confirmed that the principle for developing the site for residential purposes is acceptable as the majority of the site is located within the Beckermat settlement boundary.
- 2.3 It was clarified that the Local Planning Authority would be supportive of the proposal to convert the existing sandstone barn located at the front of the site, particularly due to its impact on the Conservation Area.
- 2.4 It was clarified that the main issues with regard to a development of this nature would relate to the impact on the Conservation Area and Highway Safety.
- 2.5 A Heritage Statement was requested to assess the heritage impacts of the proposals. Cumbria Highways requested that the frontage was cleared to enable visibility splays to be improved; however, it was also requested that consideration is given to retaining the wall but reducing the height to that of the neighbouring site to the east of the application site. Cumbria Highways also provided some guidance with regards to flood risk and drainage.
- 2.6 An ecology report, bat and bird survey were insisted upon together with a rationalisation of whether a structural report was appropriate for the agricultural barn in this instance.
- 2.7 This Supporting Statement provides a response to the information requested within the Council's pre-application advice as part of the comprehensive review of the existing site and the development proposals.

3.0 Site and surroundings

- 3.1 The application site is located on the southern side of Nursery Road which is the main road through the eastern side of Beckermat village.
- 3.2 Beckermat is an identified Local Centre within Copeland Council's development hierarchy. The whole of the proposed application site, which includes both the buildings and the associated farmyard area, lie within Beckermat's Development Boundary, as demonstrated by the Local Plan Proposals Map extract in Figure 1 below.

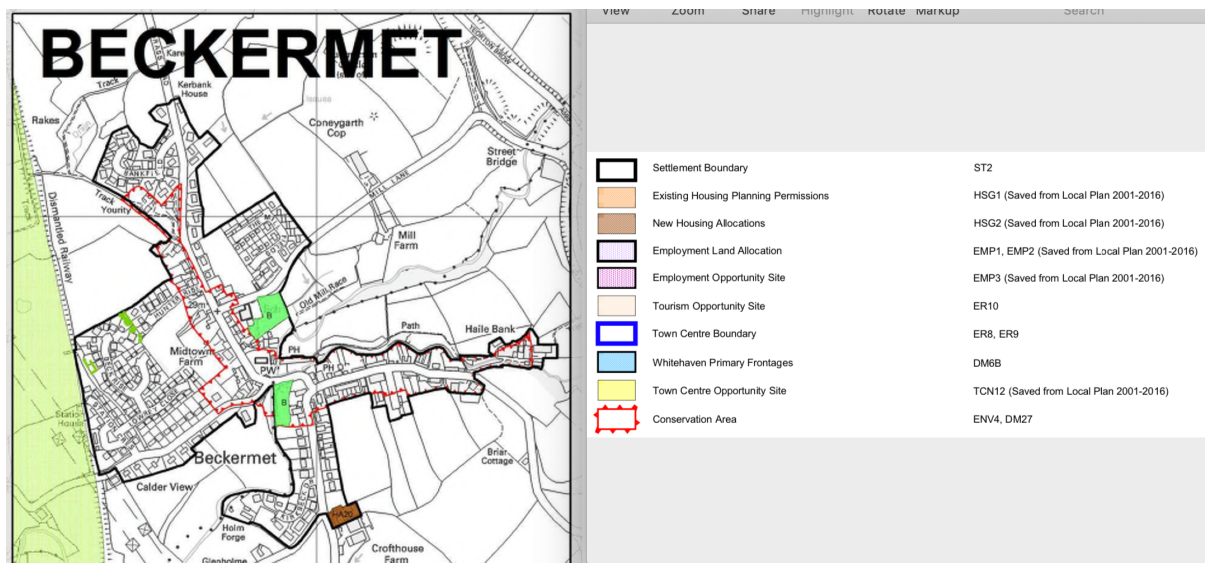


Figure 1 – Local Plan Proposals Map Extract (December 2013)

- 3.3 We have enclosed a series of site photographs in **Appendix A** of this Supporting Statement. The photographs serve to demonstrate that the application site accommodates a large traditional red sandstone barn that dominates the site frontage and a single-storey open sided lean-to agricultural building that sits between the traditional barn and the sandstone wall that fronts onto Nursery Road. There is also a smaller stone building that it situated on the western side of the site frontage.
- 3.4 The traditional stone barn and its frontage are non-designated heritage assets that sit within Beckermat's Conservation Area and are in a relatively good state of repair on the whole, with the barn being in a far superior state of repair than many barn conversions WDP and APD have previously worked upon in the Cumbria and Yorkshire areas. The traditional barn is mostly pointed and has straight walls that are structurally sound and capable of conversion.
- 3.5 The existing farm access runs along the western side of the traditional stone barn through to a farmyard that has two large agricultural shed and a number of farm vehicles. The traditional standstone barn has two single storey lean to extensions, previously used to accommodate pigs and other livestock, and a ramped access up to large open plan barn at second floor with an elevated roof. The sandstone barn is an attractive landmark building constructed out of locally sourced sandstone and has an unusual stone inlays at eaves height that make it an important attribute of Beckermat's Conservation Area.

- 3.6 The application site sits between residential properties to the north, east and west and has an open field to the rear that belongs to the applicant but does not form part of the application site. The farmyard at the rear of traditional sandstone agricultural buildings accommodates agricultural sheds used for storing machinery and as a workshop to repair and/or maintain agricultural vehicles. The farmyard has a concrete hardstanding area with an access track that runs down the middle and western sides of the farmyard through to the applicant's field to the south. The farmyard also accommodates many agricultural-related vehicles and materials such as fencing posts and wire, stone and rubble. There are a small number of shrubs and semi-mature trees on the boundary of the site, with these predominantly being outside the ownership boundary, with no trees and/or shrubs that should affect the proposed redevelopment of the site in the future.
- 3.7 Although the farm buildings and associated farmyard are evidently being used for the storage and maintenance of farm machinery, the Applicants have increasingly found that the family use their other more modern farm buildings that are located more centrally within their landholding that runs down to the coast, due west of Beckermat. The location of the site in the centre of Beckermat Village is less than ideal for day-to-day farming activities due to the need to access the site with farm vehicles, the surrounding residential context and the buildings being traditional, dated and unsuitable for modern farming practices. The application site is, therefore, deemed surplus to the farm's agricultural needs and is evidently far better suited for redevelopment for residential dwellings given its sustainable location at the heart of the village and the surrounding residential context.

4.0 Development Considerations

- 4.1 This planning application is being submitted for the following form of development:
- “Change of use and conversion of agricultural barn and associated farmyard to provide the phased delivery of up to 5 no. self, custom or developer built residential dwellings with associated infrastructure and ancillary facilities - in Outline with Access defined.”***
- 4.2 The intention is to provide a low-density high quality development that will complement the character and setting of Beckermert’s Conservation Area.
- 4.3 The General Permitted Development Order 2015 (as amended) enables Applicants to first submit an Outline Planning Application to agree the principle of a proposed development, with the detailed design being reserved for approval at the Reserved Matters stages of the full planning application process.
- 4.4 This planning application is submitted in Outline with the primary access point being defined in order to first agree the principle of the proposed residential development of the site and confirm that the primary access point will be fixed as per the existing agricultural farm access.
- 4.5 The Existing Site Plan (Drawing No. KL2895/01) identifies the existing layout of the buildings on site and the associated hardstanding areas.
- 4.6 The proposed plans have been informed by a review of relevant planning guidance, the ecology report and the advice received from Copeland Council as part of the pre-application consultations.
- 4.7 The Indicative Site Layout Plan (Drawing No. KL2895/02) illustrates 3 no. 3-bed dwellings and the sub-division of the traditional barn into 2 dwellings. Each unit has 2 no. car parking spaces and 5 no. visitor car parking spaces with large turning areas and indicative soft planting areas. Each units has a dedicated private garden area with pedestrian access through to the rear of each property. The layout ensures that the existing tree and its associated root protection on the south west boundary remains unaffected.
- 4.8 The existing primary access point and access route down the western side of the barn will be retained given its good visibility splays. The primary access point has been fixed given that this is the most logical location for the access at the site. Fixing the primary access point in the existing location ensures the retention of the existing stone wall that is an attractive feature and makes a positive contribution the character and appearance of the Conservation Area. The 2.1 metre high sandstone wall will be reduced in order to improve the existing visibility splays are retained and improved when access/egressing the site. Fixing the access point in the same place as the existing will enable the barn conversion to accommodate either domestic curtilage or car parking areas to the front in the place of the existing lean-to building.
- 4.9 This Outline Planning Application is supported by a suite of supporting plans that provide the necessary detail at this Outline Planning Application stage. These plans are supplemented by a number of Suggested Planning Conditions outlined in Section 8.0 of this Statement to ensure a satisfactory standard of development at the Reserved Matters stages of the full planning application process.

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- 4.10 Whilst APD have prepared a 'Controlling Parameter Plan' with previous Outline Planning Applications in order to provide key controls on certain design considerations, such as building heights, building zones and landscaping buffer / no building zones; in this instance it is apparent that there is a lack of any constraints on this site that warrant control, given the brownfield nature of the existing site and surrounding residential environment. We have, however, outlined some potential conditions in section 8.0 'Suggested Planning Conditions' of this Statement that can be attached to the Outline Planning Application should the Council consider this necessary and/or appropriate.
- 4.11 The Indicative House Type Plan (Drawing No. KL2895/03) provides a copy of the floor plans and elevational treatments. The north (i.e. front elevation) incorporates stone facing details and the southern façade incorporate ample glazing to provide solar gain and maximise the south facing aspect.
- 4.12 There are no proposed elevation or floor plans of the barn conversion at this Outline stage due to the fact that the planning application is being submitted for 'up to' 5 dwellings to allow some flexibility on the prospective self-builder or developer to convert the barn into one or two dwellings. The flexibility on the number of units also provides the opportunity to deliver two instead of three houses to the rear of the traditional stone barn in order to respond to housing demand.
- 4.13 The existing site frontage detracts from the Conservation Area setting by virtue of the agricultural lean-to building that will be removed in order to provide an attractive open residential frontage to the landmark traditional stone building. The stone barn will be retained and enhanced through the removal of the unsightly lean-to agricultural building that current detracts from the character and appearance of the Conservation Area.

5.0 Planning Policy Considerations

Introduction

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 identifies that decisions on planning applications *"must be made in accordance with the [development] plan unless material considerations indicate otherwise."*
- 5.2 The 'development plan' for Copeland Borough Council has not changed since the approval of the previous planning application (Ref: 4/16/2340/0F1) on 7th July 2018 and comprises of The Core Strategy and Development Management Policies DPD (December 2013) and the 'saved' policies from the Copeland Local Plan 2001-2016 (adopted 2006).
- 5.3 The National Planning Policy Framework and associated Government guidance are material considerations given that they post-date the adoption of Copeland Borough Council's Local Plan.
- 5.4 We have set out a summary of the key local and national planning policy and guidance of relevance to this planning application below, noting that Heritage and Conservation-related policies are reviewed in the Heritage Statement section of this Supporting Statement.

National Planning Policy

- 5.5 The revised National Planning Policy Framework (NPPF, February 2019) is a statement of government policy in relation to planning matters nationally. Council's Development Plans must accord with the general principles detailed in the NPPF and it is a material consideration in the determination of all planning applications.
- 5.6 The Framework, taken as whole, represents the Government's definition of what constitutes a sustainable development. This definition of sustainable development includes three key roles: an economic role; a social role; and an environmental role. These aims are mutually dependent and should be sought jointly and simultaneously by the planning system.
- 5.7 Paragraph 11 identifies that:

"Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."
- 5.8 Paragraph 38 of the NPPF identifies that:

"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of

the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

5.9 Paragraph 59 of the Revised NPPF identifies that:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

5.10 Paragraph 61 identifies that:

5.11 *“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and **people wishing to commission or build their own homes**¹).”*

5.12 Paragraph 68 of the RNPPF places a renewed and strengthened emphasis on delivering small and medium sized sites and support the development of windfall sites (i.e. as per our client’s site) through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes. This support given that they are often built-out quickly to boost housing supply as well as offering a greater mix of housing.

5.13 Paragraph 137 encourages LPAs to use underutilised land (i.e. such as our client’s land that has no agricultural value and is currently unused) over open greenfield sites.

5.14 Annex 2 defines Previously developed land as *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”*

Development Plan Policies

5.15 The Core Strategy and Development Management Policies DPD (adopted 5 December 2013) forms the main part of the Development Plan for the borough of Copeland. The Council will also continue to have regard to the remaining ‘saved’ policies from the Copeland Local Plan 2001-2016 (adopted 2006) relating to specific areas of land (which will be reviewed in the Site Allocations and Policies Plan).

5.16 The Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies contains the following relevant planning policies:

5.17 **Policy ST2 – Spatial Development Strategy** identifies that:

“Development in the Borough should be distributed in accordance with the following principles:

¹ Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.

A Growth: providing for and facilitating growth in the local economy, particularly in the energy sector, accompanied by net growth in jobs and an associated increase in demand for housing and services

B Concentration: development will be located in the Borough's settlements at an appropriate scale, within defined settlement boundaries, in accordance with the Borough's settlement hierarchy as set out in Figure 3.2:

i) Focussing the largest scale development and regeneration on Whitehaven and the important development opportunities there

ii) Supporting moderate levels of development reflecting the respective scale and functions of the smaller towns (Cleator Moor, Egremont and Millom), and contributing to the regeneration of the town centres.

iii) Permitting appropriately scaled development in defined Local Centres which helps to sustain services and facilities for local communities

C Restricting development outside the defined settlement boundaries to that which has a proven requirement for such a location, including:

i) Energy - nuclear: support for the development of new nuclear generating capacity at Moorside, and a willingness to discuss a potential Geological Disposal Facility for higher level radioactive waste in the Borough

ii) Energy - renewable: support for renewable energy generating proposals which best maximise renewable resources and which minimise environmental and amenity impacts

iii) Essential infrastructure to support energy development and other infrastructure that requires locating outside settlement limits

iv) Existing major employment locations, especially Westlakes Science and Technology Park, and the completion of defined allocated or safeguarded employment sites

v) Land uses characteristically located outside settlements, such as agriculture or forestry, farm diversification schemes or tourism activities requiring location in the countryside, or prisons

vi) Housing that meets proven specific and local needs including provision for agricultural workers, replacement dwellings, replacement of residential caravans, affordable housing and the conversion of rural buildings to residential use

D Proportions: the four towns are expected to accommodate approximately 80% of all (non-nuclear) development over the plan period

E Safety: the potential impact of proposals within Safeguarding Zones for hazardous installations should be properly considered."

5.18 Policy DM12 – Standards for New Residential Developments identifies that:

"Proposals for new residential developments should incorporate:

A Car parking provision in accordance with adopted residential parking standards

B Minimum separation distances whereby:

i) Detached and end of group dwellings retain at least 1.0m distance between dwelling walls and side boundaries

ii) a minimum of 21.0m is retained between directly facing elevations of dwellings containing windows of habitable rooms

iii) a minimum of 12.0m is retained between directly facing elevations of dwellings containing windows of habitable rooms and a gable or windowless elevation

C A minimum of 0.4ha of public space for every 200 dwellings pro-rata on developments of 10 or more dwellings, and in groups of family housing a minimum of 100m² of children's play space should be provided at the rate of one play space per 30/40 dwellings

D All new development should be designed to Lifetime Homes and (on developments of ten dwellings or more) Building for Life standards."

5.19 Policy DM13 - Conversions of Buildings to Residential Use within Settlement Limits identifies that:

"Proposals for the conversion of suitable non-residential buildings or sub-divisions of large houses to provide new residential accommodation will be permitted so long as:

- A Adequate internal space standards and exclusive use of kitchen and bathroom facilities can be achieved without extensive alterations or additions to the property*
- B Off street car parking is provided in accordance with parking standards*
- C Adequate and appropriate external amenity space is provided*
- D The conversion works conserve the character of the building*
- E No alterations or associated works create amenity problems for residents of adjacent properties."*

5.20 Policy SS1 – Improving the Housing Offer identifies that:

"The Council will work to make Copeland a more attractive place to build homes and to live in them, by:

- A Allocating housing sites to meet local needs in locations attractive to house builders and requiring new development to be designed and built to a high standard*
- B Promoting the renovation and improvement of the Borough's existing housing stock, and the enhancement of the surrounding residential environment, to meet local housing needs, particularly in Whitehaven, the three smaller towns, and Local Centres*
- C Considering further partnership and funding options (in consultation with local communities) for demolition and redevelopment schemes in areas of low demand or where the stock does not meet local housing market needs. This will include the continuation of previous Furness and West Cumbria Housing Market Renewal schemes."*

5.21 Policy SS2 – Sustainable Housing Growth identifies that:

"House building to meet the needs of the community and to accommodate growth will be provided for by:

- A Allocating sufficient land for new housing development to meet identified requirements within the Borough*
- B Allocating land in accordance with the following housing targets:*
 - i) A baseline requirement, derived from projected household growth, of 230 dwellings per year*
 - ii) Provision for growth 30% above that, to 300 dwellings per year*
- C Seeking densities of over 30 dwellings per hectare, with detailed density requirements determined in relation to the character and sustainability of the surrounding area as well as design considerations*
- D Seeking to achieve 50% of new housing development on previously developed 'brownfield' sites.*

5.22 Policy SS3 – Housing Needs, Mix and Affordability identifies that:

"Applications for housing development should demonstrate how the proposal helps to deliver a range and choice of good quality and affordable homes for everyone.

A Development proposals will be assessed according to how well they meet the identified needs and aspirations of the Borough's individual Housing Market Areas as set out in the Strategic Housing Market Assessment, by:

- i Creating a more balanced mix of housing types and tenure within that market area, in line with the evidence provided in the SHMA*

ii Including a proportion of affordable housing which makes the maximum contribution (consistent with maintaining the viability of the development) to meeting identified needs in that market area

iii Establishing a supply of sites suitable for executive and high quality family housing, focussing on Whitehaven and its fringes as a priority and also giving particular attention to the three smaller towns

iv Ensuring that housing meets special needs, for example those of older people, where there is a genuine and proven need and demand in a particular locality

v Providing housing for specific groups where there is housing need, including temporary workforce, agricultural workers and key workers

B The Council will continue to operate a Rural Exception Site policy approach in rural areas outside the Key Service Centres and Local Centres to provide affordable housing that meets an identified local need and will be secured to meet that need in perpetuity

C The Council will work with neighbouring authorities to meet any evidenced need for Gypsy and Travellers sites and to provide greater choice. (Please see Policy DM20 for further detail)."

Affordable Housing Position

- 5.23 The Government's National Planning Practice Guidance (NPPG) post-dates the adoption of Core Strategy Policy SS3 which outlined Copeland Council's affordable housing policy. The NPPG identifies that the Government introduced a standard threshold that affordable housing should only be required for housing schemes of 10-units or 1000 sqm gross floorspace, with a flexibility to reduce this down to a 5-unit (1000sqm floorspace) in rural areas. It is apparent, therefore, that there is no need for affordable housing on this small-scale development site.

Planning Policy Review

- 5.24 The proposed residences will diversify the new build residential offer in Beckermat by providing exclusive family-sized accommodation in line with advice received from PFK residential agents and within the settlement boundary of Beckermat village.

- 5.25 The Self-build and Custom Housebuilding Act 2015 placed a duty on Councils to have regard to their self-build and custom housebuilding register when carrying out their planning and housing functions. The National Planning Practise Guidance identifies that:

"Authorities are encouraged to work closely with local delivery partners to ensure that self-build and custom housebuilding is an integral part of their housing delivery strategy...Assessment of local housing need as a whole should be conducted using the standard method in national planning guidance. Within this context, the size, type and tenure of housing needed for different groups should be assessed including people wishing to self-build or custom-build their own homes."

- 5.26 Copeland Council's latest Housing Needs Survey (July 2020) identifies that 42% of existing households planning to move in Copeland Borough needed 3-bed homes, with 79% requiring owner-occupation. With regards to self-build projects, the 'interest in housing options' identifies that:

"Self-build projects seemed to have the strongest appeal with 15% having some level of interest. This could be supported by comments from a few respondents in the survey who indicated they had either completed or were in the process of such a project. The appeal

seemed to be broad across all ages, tenures and levels of economic activity. But it was strongest amongst those under 50, those with a mortgage and those who are working.”

- 5.27 This choice of housing sites is important to both consumers that wish to build high quality homes that are different from the volume housebuilders’ offer; as well as being important to the smaller-scale local housebuilders who cannot compete with the volume housebuilders’ scales of economy and/or afford to deliver the larger-scale housing sites.
- 5.28 The proposed conversion of the traditional stone barn accords with Policy DM13 which allows for conversions of buildings within the settlement boundary and the proposed demolition and replacement of the other buildings within the farmstead will provide a significant improvement to the residential amenities of neighbouring properties by removing the agricultural use and the associated potential for associated noise and smells.
- 5.29 The Indicative Site Layout serves to demonstrate that the proposed maximum of 5 units can be provided with ample off-street parking and good levels of external amenity space as well as exceeding the Council’s residential design standards and separation distances.
- 5.30 The proposals accord with Policy SS1 by providing a high quality housing offer in-line with identified need for 3-bed units and self-build accommodation that will offer increased choice to diversify the housing market in line with the Council’s most recent account of housing demand within the Copeland Borough. The review of the Environmental Considerations below identifies that there are no known technical constraints to delivering the proposed development in the manner outlined in the Indicative Site Layout. Accordingly, we urge the Council to approve the proposals in accordance with the NPPF’s presumption in favour of sustainable development.

6.0 Environmental Considerations

- 6.1 This section provides a brief summary of the environmental and technical considerations that have been reviewed in order to inform the Indicative Site Layout and the Suggested Planning Conditions outlined in Section 7.0 of this Statement. This section also provides a response to any details requested within the pre-application consultation with Copeland Council.

Access & Parking

- 6.2 Paragraph 109 of the National Planning Policy Framework (NPPF) identifies that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

- 6.3 The change in use of the farm to the proposed residential use will ensure a net improvement to highways safety. It is evident that the farmyard is used for the storage and maintenance of farm-related vehicles and the existing lawful use does give rise to the potential for a significant amount of HGV movements that are often associated with the agricultural use of land.
- 6.4 The change in use from agriculture to residential removes the potential for daily trips by large farm vehicles, which it should be noted could increase significantly if the existing agricultural use of the site were retained, replacing the farm use with smaller domestic vehicles that will be more in-keeping with the village centre location and residential context.
- 6.5 The proposed residential development will utilise the existing access point given that this is the most logical access point given the need to retain the historic sandstone wall on the western side of the frontage as well as retaining this frontage for private amenity spaces associated with the barn conversion. There is, therefore, no reasonable justification to provide visibility splays given that the proposed change of use will improve highways safety overall and the access point is evidently the most suitable location given the site's characteristics. The reduction of the sandstone wall to 1 metre, to match in with the wall to the west, will also provide the maximum potential improvement to the visibility splays available at the site, thus providing a demonstrable overall improvement to highway safety.
- 6.6 Paragraph 110 of the NPPF requires development to allow for the efficient delivery of goods, and access by service and emergency vehicles.
- 6.7 The Indicative Site Layout Plan incorporates a bin storage area within the location of the existing small stone building that fronts onto Nursery Road with sufficient space to accommodate all bin storage for the site. The site also incorporates an off-street car parking area to the front of the proposed barn conversion and large parking and turning area to the rear that will enable easy access and turning for emergency vehicles.
- 6.8 The proposed reduction of the height of the sandstone wall along the frontage will
- 6.9 There is sufficient space both within the shared car parking areas and private residential amenity areas to accommodate cycle parking facilities and further details of the exact appearance and specification can be submitted and agreed within the Reserved Matters Application(s). being controlled via planning condition.

Flood Risk & Drainage

- 6.10 Copeland Council's pre-application response enclosed advice from Cumbria County Council's Flood & Development Management Officer clarified that the scale of the site does not warrant a Flood Risk Assessment but observed that part of the site was in Flood Zone 2.
- 6.11 We have enclosed a copy of the Environment Agency's Flood Risk Map in Appendix B of this Statement. The Map extract identifies that the vast majority of the site is within Flood Zone, an area with a Low Probability of Flooding. The only part of the site that is within Flood Zone 2 is a small section near to the site access that is illustrated within the Indicative Site Layout Plan as being within the front ancillary curtilage area of the proposed new barn conversion. There is no likelihood or possibility of habitable space within the Flood Zone 2 area given that the land is currently hardstanding area that fronts Nursery Road.
- 6.12 The use of land as amenity space within Flood Zone 2 is acceptable as long as there are safe pedestrian access routes to Flood Zone 1 areas and there are evidently dry pedestrian safe routes to Flood Zone 1 areas in this instance. Furthermore, the source of the flood risk is Black Beck that sits on the northern side of Nursery Road. There are currently residences, including the Applicant's main farmhouse, that lie between Black Beck and the application site and also lie within the Flood Zone 2 area. There has never been an incident of fluvial flooding at our client's residence, so there is no real risk of flooding even within the Flood Zone 2 area of the site.
- 6.13 It is evident that the proposed redevelopment of the site for residential is acceptable from a flood risk perspective. Whilst it is evident that there is no intention of introducing habitable accommodation with the Flood Zone 2 area, if Copeland Council consider it necessary the Applicant is agreeable to a planning condition being attached to the Outline Planning Consent prohibiting residential building within the Flood Zone 2 area.
- 6.14 The Existing Site Plan illustrates that there is a high level of hardstanding on the existing farmstead, with the Indicative Site Plan illustrating that the proposed residential use will result in a reduction in impermeable surfacing that will result in a net reduction in surface water run-off.
- 6.15 Given that this is an Outline Planning application with all matters being reserved aside from the primary access point it is appropriate in this instance to attach standard conditions requiring the submission of the foul and surface water drainage strategy to be evolved alongside the detailed design at the Reserved Matters Stages of the full planning application process. The Flood and Development Management Officer identifies that it is likely that the site will connect into the existing drainage which is the United Utilities combined system. United Utilities will be consulted as a statutory consultee as part of the Outline Planning Application so it is envisaged that a discharge rate can be agreed and conditioned and a suitable drainage strategy can be agreed that includes any potential gains that can be made to reduce the impact on the local drainage system.

Ecology

- 6.16 Policy ENV3 relates to 'Biodiversity and Geodiversity' identifies that:

"The Council will contribute to the implementation of the UK and Cumbria Biodiversity Action Plan within the plan area by seeking to:

A Improve the condition of internationally, nationally and locally designated sites

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B Ensure that development incorporates measures to protect and enhance any biodiversity interest

C Enhance, extend and restore priority habitats and look for opportunities to create new habitat

D Protect and strengthen populations of priority or other protected species

E Boost the biodiversity value of existing wildlife corridors and create new corridors, and stepping stones that connect them, to develop a functional Ecological Network

F Restrict access and usage where appropriate and necessary in order to conserve an area's biodiversity value."

- 6.17 Policy DM25 supports this policy, setting out the detailed approach towards managing development proposals that are likely to have an effect on nature conservation sites, habitats and protected species.
- 6.18 AIBM Ecology have produced an Ecological Impact Assessment that incorporates a Bat Survey. The ecology report provides the following observations and recommendations:
- No statutory or non-statutory designated sites for conservation would be significantly affected by the proposed development.
 - There are no habitats that would be directly affected by the proposed development of more than Site biodiversity value.
 - There is the potential for the presence of several protected and/or notable species but only nesting birds have been recorded. The size of the Site means even if present, the species would not be significant populations but as best practice and/or to avoid the potential for an offence, mitigation and compensation are provided to ensure no species are harmed by the works and to provide habitat for species to utilise the development once operational.
- 6.19 In summary, all identified potential significant effects/constraints to the development and identified impacts would be mitigated for as follows:
- No building would be placed local to the ash tree at TN1 that has low bat roost potential and the overall design in that area will be garden/ soft landscaping.
 - Creation of habitat (hibernacula) outside the development footprint to enable use by amphibians, reptiles, and hedgehogs.
 - Ecology watching brief of site clearance of areas of rubble, stone and wood to ensure no harm to any animals using this material for resting and/or hibernation. It is recommended these are cleared outside the hibernation period (Nov – Feb).
- 6.20 Ensure that the non-native invasive species Japanese Rose, if confirmed, is not spread off-site. Any removal work of the plant or associated soil would be dealt with appropriately (disposal on site and location recorded as part of the construction plans) and in-line with legislation.
- 6.21 To avoid the potential of harm to bats and nesting birds that may be found during conversion of the barn and to provide biodiversity benefit to the local and wider environment, the following standard practice would be employed:
- Standard Construction methods would be employed to ensure no impact on the environment from dust and noise during construction.
 - Ground clearance and demolition of buildings would be done wherever possible outside the main bird breeding season (Mar-Aug), however, some species, such as swallow, can have second or third broods into September if weather conditions are favourable and so

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where it is not possible to avoid these months, a check for nesting birds would be carried out. If birds are found nesting in any of the buildings, demolition of that building(s) can only proceed once it has been confirmed that the birds have fledged.

6.22 To minimise the risk of any harm to individual bats and support the favourable status of bats in the locality, the following is proposed:

- Any non-structural gaps in the external stonework would be left un-pointed or where not possible, checked for presence of bats by a licenced bat ecologist before re-pointing.
- Removal of the roof coverings in the barn would be undertaken under supervision of a licenced ecologist, checking for any bats around any of the roof timbers.
- If any bats are found, then works must stop immediately on that building and the licenced ecologist assess what is required to proceed.
- External lighting for the proposed development would be kept to a minimum and low level down-lights used where practical, to ensure that foraging and commuting habitat is not affected.

6.23 The following enhancement measures would be provided to offset losses of suitable potential nesting and roosting features:

- External and/or internal bat boxes would be incorporated into the design of the houses. The type and location would be agreed with an experienced bat ecologist.
- Bird nesting boxes, including open-fronted, cavity fronted and nest boxes suitable for swallow attached or built into suitable structures would be incorporated into the design of the houses. The type and location would be agreed with an experienced ornithologist.

Contamination Considerations

6.24 The Existing Site Plan has been extrapolated from a topographical survey which identifies that there is a fuel tank on the western boundary of the site. The farmyard has accommodated farm vehicles and animals for a number of years. This historical land use gives rise to the potential for contamination that will need to be assessed and remediated prior to the implementation of the residential consent.

6.25 The Indicative Site Layout Plan clarifies that the fuel tank will be removed and the area around the tank will be retained as an access road and turning areas, with the new houses being set further south within the site.

6.26 The proposals will, therefore, provide an improvement by removing potential sources of contamination that will need to be fully assessed and mitigated prior to commencement of the proposed development, the details of which should be provided with the Reserved Matters Application(s) to ensure a satisfactory standard of development.

6.27 We have included a suggested condition for a Contamination Report that is considered to be the appropriate and proportionate response to this matter in light of the historic land use and it being evident that there are no sources of contamination that cannot be adequately mitigated in this instance.

Landscaping & Trees

- 6.28 The application site does not contain any trees and/or flora or fauna that could have a bearing upon the proposed layout of the scheme aside from the one tree that is on the southwestern boundary.
- 6.29 The Indicative Site Layout Plan identifies that the building and associated hardstanding area that is in this location will be removed that should have a net improvement to the Root Protection Area. We have included a suggested planning condition that ensures appropriate protection of the tree that will ensure an appropriate standard of development.

7.0 Heritage Statement

- 7.1 This Section reviews the heritage and conservation-related UDP policies and demonstrates that the proposed change of use from the current agricultural use to residential should have a positive impact upon the character and appearance of Beckermat's Conservation Area.

Legislation, Policy & Guidance

- 7.2 Section 16 of the NPPF, entitled '*Conserving and enhancing the historic environment*' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets.
- 7.3 Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:
- Delivery of sustainable development
 - Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment, and
 - Conservation of England's heritage assets in a manner appropriate to their significance.
- 7.4 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 189 states that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset. This is supported by paragraph 190 which states that LPAs should take this into account when considering applications.
- 7.5 Paragraphs 193 to 196 consider the impact of development proposals upon the significance of designated heritage assets.
- 7.6 Paragraph 193 states that where a development is proposed that would affect the significance of a designated heritage asset, great weight should be given to the asset's conservation and that the greater an asset's significance, the greater this weight should be.
- 7.7 Paragraph 195 emphasises that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this should be weighed against the public benefits of the scheme, bearing in mind the great weight highlighted in Paragraph 193.
- 7.8 Heritage Assets are defined in Annex 2 of the NPPF as: '*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*'.'
- 7.9 A Designated Heritage Asset comprises a '*World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*'.
- 7.10 Significance is defined as: '*The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or*

historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'

7.11 The Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies Document contains the following heritage-related policies:

7.12 Policy ENV4 relates to 'Heritage Assets' and identifies that:

"The Council's policy is to maximise the value of the Borough's heritage assets by:

A Protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value

B Supporting proposals for heritage led regeneration, ensuring that any listed buildings or other heritage assets are put to an appropriate, viable and sustainable use

C Strengthening the distinctive character of the Borough's settlements, through the application of high quality urban design and architecture that respects this character and enhances the settings of listed buildings."

7.13 Policy DM27 supports this policy, setting out the Council's approach to development which affects built heritage and archaeology.

7.14 Policy DM27 relates to 'Built Heritage and Archaeology' and identifies that:

"A Development proposals which protect, conserve and where possible enhance the historic, cultural and architectural character of the Borough's historic sites and their settings will be supported. This will be particularly relevant in the case of:

i) Scheduled Ancient Monuments

ii) Conservation Areas

iii) Listed Buildings and structures

iv) Non-listed buildings and structures or landscape features of local heritage and archaeological value

v) Surface and below ground archaeological deposits

B Development proposals which have a significant adverse effect on a Scheduled Ancient Monument or its wider site or setting will not be permitted

C Development within Conservation Areas will only be permitted where it preserves or enhances the character or appearance of the area and, where appropriate, views in and out of the area. The Council will pay particular attention to:

i) How new development respects the character of existing architecture and any historical associations, landscape features, open spaces, trees, walls and quality of townscape

ii) The impact of any proposed works to trees with regard to policy DM28

iii) The design of any proposals for new or altered shopfronts and / or signage, which should be an integral part of the design and avoid the use of internally illuminated signage

D Development which affects Listed Buildings or their setting will only be permitted where it:

i) Respects the architectural and historic character of the building

ii) Avoids any substantial or total demolition, or any demolition that is not related to proposed development affecting the building

iii) Does not have a significant adverse effect on the setting or important views of the building

iv) Involves a change of use to all or part of the listed building which contributes to the conservation and overall economic viability of the building, and where the use can be implemented without any adverse alterations to the building

E Any development proposal which is considered to affect an existing or potential site of archaeological importance will be required to be accompanied by an archaeological assessment. Where archaeological deposits are evident, below ground or on the surface, evidence should be recorded and where possible preserved in-situ. Proposals for

development where archaeological interest has been established will not be approved until evidence has been provided that the risk of archaeological disturbance has been adequately investigated and has been minimised. Planning permission will not be granted if the impact on potential archaeology is unacceptable.”

Review of Significant of Heritage Impact

- 7.15 Plan 1 of Beckermat's Conservation Area Appraisal (August 2017) identifies that that the front portion of the application site lies within the Conservation Area.
- 7.16 The very pattern of farms and houses reflect Beckermat's historical development that, until the early C20, was one of a village dominated by agriculture with working farms and labourers' cottages.

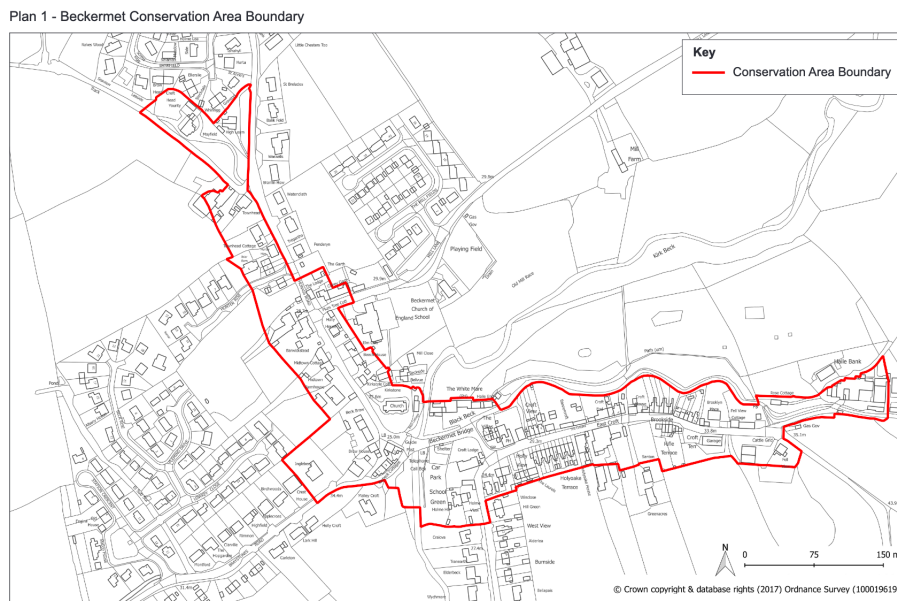


Figure 2 – Beckermat Conservation Area Boundary

- 7.17 Whilst most buildings within the Conservation Area are residential, there are a couple of working farms, two pubs, a garage with fuel pumps, a motorbike parts supplier and a church. The use that dominates Beckermat, however, is the nearby Sellafield nuclear plant and many residents work there. Sellafield also generates demand for mid-week, temporary accommodation as well as through rush hour traffic.
- 7.18 Beckermat's Conservation Area is identified as having the following key characteristics:
- Early origins, thought to date back to C7
 - Historic development pattern reflecting land ownership and tenure
 - Remaining evidence of historic land cultivation patterns
 - Confluence of two streams – Black and Kirk Becks that divided the former Parishes of Beckermat St John's and Beckermat St Bridget's
 - No defined village centre, but open area around Beckermat Bridge acts as such
 - Main building period – late C17 to 1919
 - Most properties make a positive contribution to the Conservation Area
 - In general buildings face the road, front elevation on

- Social hierarchy evidenced by back of pavement building line in lower status properties to more prestigious, later properties set well back in gardens
- Widespread use of local sandstone, particularly St Bees, as a building material
- Houses are mostly two storeys with chimneys
- Unbroken graduated roofs in local slate. Dormers on some later buildings
- Rendered houses, some brightly painted
- Wide range of buildings and architectural styles from vernacular agricultural farms and attached barns to later higher status detached properties.
- Cohesion and sense of place deriving largely from consistent palette of building materials – sandstone, render and local slate
- Sandstone boundary walls, many cobbled
- Extensive tree coverage
- Historic tracks from East Croft and Brookside leading down to Black Beck for watering cattle

- 7.19 The existing traditional stone barn and its associated sandstone wall are non-designated heritage assets that are worthy of retention and enhancement. The Conservation Area Appraisal identifies that one of the issues with disused farm buildings are that they are in poor structural condition, especially roofs, and partial collapse and loss of these structures is likely to occur without intervention. As such, the proposed conversion to residential of the traditional stone barn to residential is a positive intervention that should be encouraged from a heritage perspective.
- 7.20 The converted barn and proposed new residences to the rear will not compromise the key characteristics of the Conservation Area. The proposed reuse of the traditional sandstone barn for residential purposes is considered to be the most appropriate use for safeguarding the future of barn and will save it and its associated historic wall from falling into a state of disrepair. The barn and the associated farmyard are not suitable in form and/or location for modern farming practises and the proposed removal of the unsightly barn to the front of the sandstone barn will provide a significant improvement to the character and appearance of Beckermat's Conservation Area.
- 7.21 Whilst the existing sandstone wall along the site's frontage will be reduced in height, this was considered to be necessary within the Council's pre-application advice in order to provide improved visibility splays when accessing/egressing the adopted highway. As such, the highways safety ensuing from this alteration were considered to outweigh the minor adverse impacts upon the character of the Conservation Area in this instance.
- 7.22 The reduction of the sandstone wall will, however, open up the frontage onto Nursery Road which, along with the removal of the unsightly lean-to agricultural building, will better reveal the significance of the traditional sandstone barn.
- 7.23 The layout of the residential dwellings and the associated car parking and turning areas retains the existing access arrangements but removes hardstanding areas to improve the setting of the traditional stone barn.
- 7.24 The future design of the new residences to the rear of the site will use building materials that will be in-keeping with the Conservation Area and add to the sense of place. The new residences will not be visible from the main road so will have little bearing upon the character and appearance of the Conservation Area. Furthermore, there is no inter-visibility between the new residences and any Listed Buildings within Beckermat's Conservation Area.

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- 7.25 The proposed change of use of the application site to residential in the manner proposed will provide a net positive contribution the character and appearance of the Conservation Area by providing the most suitable re-use of the traditional barn and associated farmyard areas that are not fit for purpose for modern farming practices.

8.0 Suggested Planning Conditions

8.1 The following Suggested Planning Conditions have been drawn from other residential Outline Planning Applications that Adams Planning & Development (APD) have secured in the recent past and provide parameters of control that ensure an appropriate standard of control over detailed design that will be evolved within the Reserved Matters Application(s).

- 1) The development hereby approved shall commence before whichever is the later of the following dates:
 - (a) within three years of the date of this permission, or
 - (b) within two years of approval of the last of the reserved matters to be approved.

Reason: To comply with the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2) Plans and particulars of the reserved matters relating to the; Layout, Scale, Appearance and Landscaping shall be submitted to and approved in writing to the Local Planning Authority and shall be carried out as approved.

Reason: This is an outline planning permission with these matters reserved for subsequent consideration.

- 3) Application for approval of reserved matters shall be made within three years of the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 4) The development hereby approved shall ensure the following design controls are adhered to within the future reserved matters application(s):
 - The primary access point into the site shall utilise the existing access point
 - The new build residences shall not exceed 2.5 storeys in height.
 - The sandstone wall at the front of site shall be reduced in height to match in with the neighbouring wall to the east.

- 5) The development hereby approved shall be implemented in accordance with the recommendations contained within AIBM's Ecology Report.

- 6) The Reserved Matters Application(s) shall be accompanied by a Contamination Report that shall be carried out and the results submitted to, and approved in writing by, the Local Planning Authority (LPA).

(a) If the Contamination Report investigations indicate that remediation is necessary, then a Remediation Strategy shall be submitted to, and approved in writing by, the LPA. The remediation scheme in the approved Remediation Strategy shall then be carried out.

Prior to the first use or occupation of any part of the development:

(b) If remediation is required, a Site Completion Report detailing the conclusions and actions taken at each stage of the works, including validation works, shall be submitted to, and approved in writing by, the LPA.

(c) Any soil or soil forming materials brought to site for use in garden areas or soft landscaping shall be tested for contamination and suitability for use. Relevant evidence and

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verification information (for example, laboratory certificates) shall be submitted to, and approved in writing by, the LPA.

- 7) Prior to commencement of development, detailed proposals for disposal of surface water shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in strict accordance with the approved scheme.
 - 8) Prior to the commencement of any development, details of the foul drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. Foul shall be drained on a separate system. No building shall be occupied until the approved foul drainage scheme has been completed to serve that building, in accordance with the approved details.
This development shall be completed maintained and managed in accordance with the approved details.
 - 9) A structural survey shall be undertaken in order to inform the design of the proposed barn conversion and shall be submitted alongside the detailed designs contained within the Reserved Matters Application.
 - 10) A Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority as part of the Reserved Matters Application(s). The CMP shall detail the construction methodology for the proposed new residences and tree protection measures. The measures shall be implemented prior to the commencement of development.
- 8.2 The precise wording of the planning conditions will be agreed with Copeland Borough Council's Planning Department following a review of the feedback received from the formal planning application consultations. We would be grateful for early clarifications and discussion on all conditions the Council and their consultees deem necessary in order to ensure an appropriate level of control over the future Reserved Matters application(s).

9.0 Summary and Conclusions

- 9.1 This Planning, Design and Heritage Statement provides a comprehensive review of the existing site, relevant planning policy and the heritage considerations and demonstrates that the proposed Outline Planning Application for up to 5 residential units is a planning policy compliant development proposal and the most appropriate land use that will lead to an enhancement of Beckermat's Conservation Area.
- 9.2 The review of Environmental Considerations identifies that there are no known technical constraints that could prohibit the proposed residential development at the scale being proposed. The Suggested Planning Conditions provide clear design controls that ensure an appropriate standard of development will be forthcoming at the Reserved Matters stages without unduly hindering prospective self-build or local developers from providing bespoke high quality housing that will complement the mix of housing in Beckermat.
- 9.3 We therefore urge the Council to approve the development proposals in accordance with the recommended planning conditions outlined in this Supporting Statement.

10.0 **Appendices**

Appendix A – Site Photographs

Appendix B – Environment Agency Flood Risk Map for Planning

Croft End Farm – Site Photos

Site Frontage





Existing Access via western side of traditional stone barn



Rear Farmyard and Buildings



Farmyard and Agricultural Machinery



Internal Storage in Stone Barn



Flood map for planning

Your reference
CroftEndBarns

Location (easting/northing)
302115/506647

Created
2 Nov 2020 13:02

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

The Open Government Licence sets out the terms and conditions for using government data.
<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Flood map for planning

Your reference

CroftEndBarns

Location (easting/northing)

302115/506647

Scale

1:2500

Created

2 Nov 2020 13:02



Selected point



Flood zone 3



Flood zone 3: areas
benefiting from flood
defences



Flood zone 2



Flood zone 1



Flood defence



Main river



Flood storage area



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