



## Planning Statement

### **Cleator Moor Innovation Quarter: Detailed Planning Application for Leconfield Plots 9 & 12**

December 2025

Contents

1. Introduction ..... 1

2. Site and Surrounding Area ..... 4

3. The Proposed Development..... 7

4. Planning History ..... 12

5. Planning Policy Context..... 15

6. Planning Appraisal ..... 23

7. Conclusion..... 29

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For and on behalf of Avison Young (UK) Limited

# 1. Introduction

- 1.1 This Planning Statement has been prepared by Avison Young on behalf of Cumberland Council ('the Applicant') to assist Cumberland Council Planning ('the Council') in its consideration of the accompanying detailed planning application at Plots 9-12 of Leconfield Industrial Estate, Cleator Moor ('the Site'):

*"Full planning permission for the erection of 2no. buildings for B2 general industrial and ancillary office use, comprising 6,356sqm GEA floorspace, associated car parking, hard and soft landscaping, associated infrastructure and landscaping and biodiversity enhancements across the wider Leconfield estate."*

- 1.2 This Statement examines the application against section 38(6) of the Planning and Compulsory Purchase Act (2004). It discusses how the development proposals conform to local and national planning policy requirements.

## Application Documentation

- 1.3 This Statement should be read alongside the following supporting documentation:

### Reports and Assessments

Item	Prepared By
Application Form	Avison Young
Design and Access Statement	NORR
Planning Statement	Avison Young
Biodiversity Net Gain Assessment Report & Metric	Tetra Tech
Ecological Assessment	Tetra Tech
Arboricultural Impact Assessment	Tetra Tech
SuDs Management Plan	BGP
Flood Risk Assessment	BGP
Drainage Philosophy	BGP
Site Investigation Phase 1 Desk Study	Solmek
Phase 2 Site Investigation	Solmek
Ground Gas Risk Assessment	Solmek
Transport Assessment	Curtins
Interim Travel Plan	Curtins
Air Quality Assessment	Miller Goodall
Noise Assessment	Miller Goodall
RIBA Stage 4 Fire Strategy	OFR Consultants

## Drawings and Plans

Application Site		
Drawing	Prepared By	Drawing Reference
Site Location Plan	NORR	LUF-NOR-09-Z Z-D-A-90000(P)P03
Architectural		
Plot 9		
Drawing	Prepared By	Drawing Reference
General Arrangement Plan - Level 00	NORR	LUF-NOR-09-00-D-A-00001(P)P02
General Arrangement Plan - Level 01	NORR	LUF-NOR-09-01-D-A-00001(P)P02
General Arrangement Plan - Roof	NORR	LUF-NOR-09-RF-D-A-27001(P)P02
General Arrangement Plan – Cross Sections	NORR	LUF-NOR-09-ZZ-D-A-00202(P)P02
General Arrangement Plan – Elevations (North & South)	NORR	LUF-NOR-09-ZZ-D-A-00102(P)P02
General Arrangement Plan – Elevations (East & West)	NORR	LUF-NOR-09-ZZ-D-A-00101(P)P02
General Arrangement Plan – Long Sections	NORR	LUF-NOR-09-ZZ-D-A-00201(P)P02
Access & Maintenance Strategy Plan	NORR	LUF-NOR-09-ZZ-D-A-68005(P)P02
Access & Maintenance Elevations	NORR	LUF-NOR-09-ZZ-D-A-68006(P)P01
Plot 12		
Drawing	Prepared By	Drawing Reference
General Arrangement Plan - Level 00	NORR	LUF-NOR-12-00-D-A-00001(P)P02
General Arrangement Plan - Level 01	NORR	LUF-NOR-12-01-D-A-00001(P)P02
General Arrangement Plan - Roof	NORR	LUF-NOR-12-RF-D-A-27001(P)P02
General Arrangement Plan – Elevations	NORR	LUF-NOR-12-ZZ-D-A-00101(P)P02
General Arrangement Plan – Sections	NORR	LUF-NOR-12-ZZ-D-A-00201(P)P02
Access & Maintenance Strategy Plan	NORR	LUF-NOR-12-ZZ-D-A-68005(P)P02
Access & Maintenance Elevations	NORR	LUF-NOR-12-ZZ-D-A-68006(P)P01
Landscape		
Drawing	Prepared By	Drawing Reference
Existing Site - Construction Area	ONE Environments	LUF-ONE-ZZ-XX-D-L-0019-P04
Existing Site - BNG Offsetting Areas	ONE Environments	LUF-ONE-ZZ-XX-D-L-0020-P01
Landscape Site Plan	ONE Environments	LUF-ONE-ZZ-XX-D-L-0001-P22
Hard Landscape General Arrangement	ONE Environments	LUF-ONE-ZZ-XX-D-L-0006-P07
Soft Landscape General Arrangement	ONE Environments	LUF-ONE-ZZ-XX-D-L-0007-P12
Drainage		
Drawing	Prepared By	Drawing Reference
Drainage Plan	BGP	LUF-BGP-09-XX-D-C-09130-C03
Flood Exceedance Plan	BGP	LUF-BGP-09-XX-D-C-09102-C03
Impermeable Areas Plan	BGP	LUF-BGP-09-XX-D-C-09101-C03

## Statement Structure

1.4 This Statement is structured as follows:

- Chapter 2 'Site and Surroundings' – provides an overview of key features of the application site and its location.
- Chapter 3 'Development Proposals' – provides details of the development for which permission is sought.
- Chapter 4 'Statement of Community Involvement' – provides a summary of the pre application engagement.
- Chapter 5 'Planning Policy Context' – provides an overview of local and national planning policy that has informed the proposals.
- Chapter 6 'Planning Assessment' – provides discussion on the key planning matters and how the proposals accord with policy requirements.
- Chapter 7 'Conclusion' – provides a summary of the development proposals and the key material planning considerations.

## 2. Site and Surrounding Area

### Site History and Context

- 2.1 The broad location for the development is the Leconfield Industrial Estate, within the town of Cleator Moor, Cumbria, UK. Cleator Moor is located approximately 4 miles east of the County Town of Whitehaven, which has a range of shops and services and national rail connections.
- 2.2 Cleator Moor developed rapidly in the 19th Century, as the industrial revolution demanded more and more coal, limestone and high-grade iron ore. Early in the 20th Century supplies began to decline. With the decline of traditional industries and the resulting high rate of unemployment, the town's economy is now dependent on the nearby Sellafield complex, which provides jobs to around half the town's people. Sellafield is now moving into a process of decommissioning with a move towards cleaning up the site which will lead to a slow but inevitable reduction in its economic activity.
- 2.3 The CMIQ is an area of Cleator Moor that includes the Leconfield Industrial Estate, a 17.6ha area of land strategically located between the Town Centre and the north western residential area of Cleator Moor. It will be home to a 'business cluster' for the new nuclear and clean energy sectors a focus for collaboration, innovation, and diversification.

### Surrounding Area

- 2.4 The site is located just outside of the town centre, to the north west of the main shopping and civic core. The majority of residential development is located outside of the main shopping parade of Leconfield Street to the east of the town centre and the to the west of Leconfield Estate.
- 2.5 One of the most famous national cycle routes, the coast-to-coast ('C2C') passes through Cleator Moor along the old railway line under the phoenix bridge and passes just to the east of the Leconfield Industrial Estate. The surrounding countryside is world class with the edge of the Lake District national park a mile to the east. Nearby Dent Fell to the southeast can be walked from Cleator Moor itself and Ennerdale Bridge at the head of the Ennerdale mountain valley is only 4 miles drive to the east.
- 2.6 The Leconfield Industrial Estate provides important employment activity within the town, however some of the site has fallen into disuse. The north western residential area of Cleator Moor is disconnected from the town centre by Leconfield Industrial Estate and the neighbouring swathe of woodland. The site therefore occupies a prime central location within the town, between the two main residential areas of the settlement.

2.7 Cleator Moor benefits from good connections to the surrounding strategic road network including the following:

- A595 linking to Whitehaven (4 Miles), Sellafield (8 Miles) and West Lakes Science and Technology Park (3miles);
- A66 linking to Carlisle (40 miles) and Northumberland beyond; and
- A5086 connecting to the M6 motorway.

## Application Site

2.8 The Leconfield Industrial Estate is accessed via the B5295 'Leconfield Street' at its southern boundary. Cleator Moor Town Centre is located circa 600m to the south-east from which it is separated by the C2C cycle route which forms the Estate's eastern boundary. The wider area is characterised by a mix of residential uses, retail and leisure uses and agricultural land.

2.9 The site has been utilised for industrial uses for many decades and was formally laid out as an Industrial Estate in the 1940s. The Industrial Estate is the town's main employment location, but it has undergone an extended period of poor management and decline, culminating with the gradual demolition of circa 40-50% of the buildings on the site.

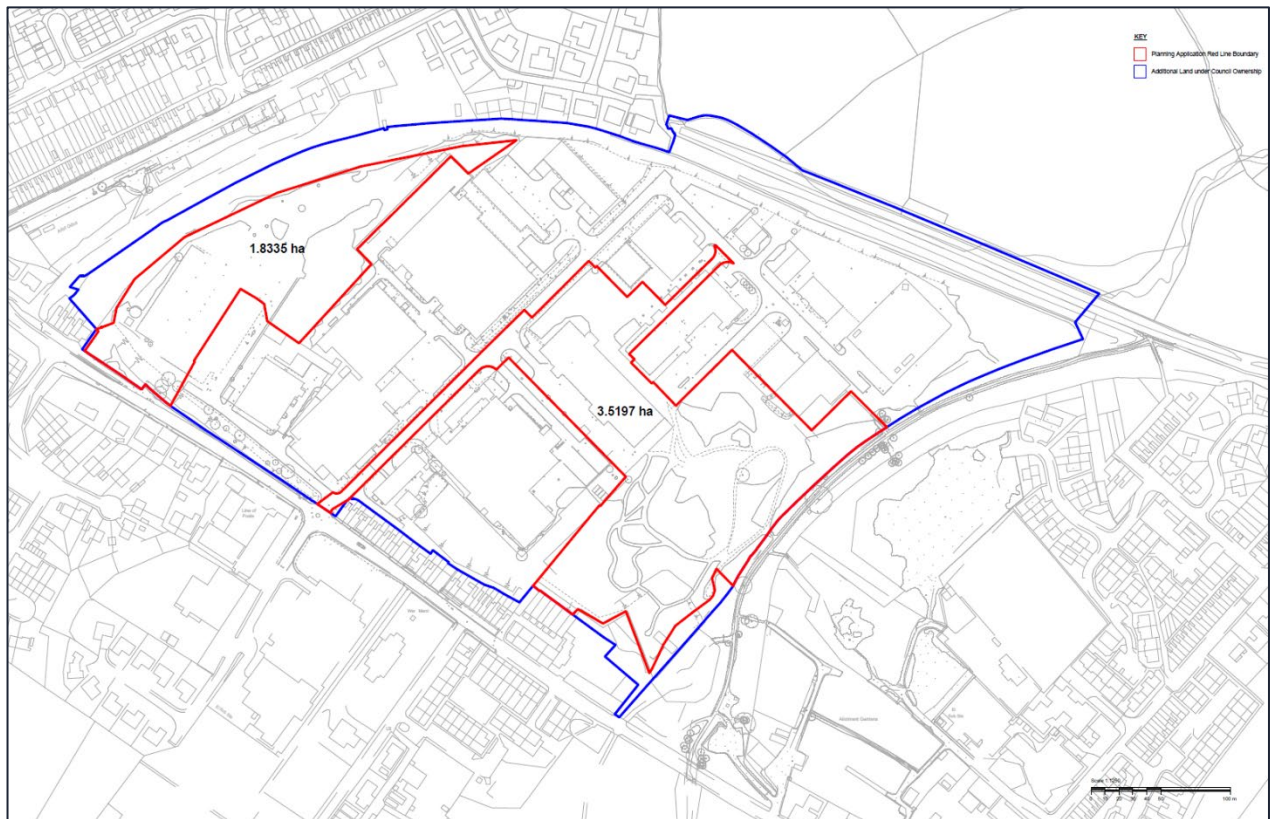
2.10 The Estate currently accommodates approximately 20 industrial warehouse units of varying sizes of standard commercial construction, including brick, corrugated iron, and prefabricated steel frame.

2.11 Ground cover on the site comprises a mix of tarmac, concrete floorplates from earlier demolished units and areas of grass/scrub land. Trees are present at the site's boundaries and peppered across the Estate's south eastern extent.

2.12 The centre of the site is approximately located at National Grid Reference NY 01655 15506 and has an area of 5.35ha comprising of areas of sealed surface, wet woodland and neutral grassland. It is surrounded by industrial, commercial and residential buildings in addition to agricultural land with Nor Beck running around north and west of the whole industrial estate.

2.13 The application site is split into two 'zones', which will be set out in more detail in following sections of this planning statement. The distinction between the 'construction' zone and the 'BNG offsetting' zone are identified on the accompanying drawings *Existing Site - BNG Offsetting Areas: LUF-ONE-ZZ-XX-D-L-0020-P01* and *Existing Site - Construction Area: LUF-ONE-ZZ-XX-D-L-0019-P04*.





**Figure 1: Application Site Boundary and Ownership Boundary**

## Technical Considerations

2.14 With regards to technical considerations the application area:

- Does not contain any Listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields or conservation areas although it is acknowledged that the Cleator Moor Town Centre Conservation Area lies c350m to the south east;
- According to the Environment Agency Flood Map, the site is wholly within Flood Zone 1 which indicates a low probability of flooding and is therefore suitable to accommodate the proposed uses from a flood risk perspective;
- Limited areas of surface water flood risk identified across the site;
- There are no statutory or non-statutory ecologically designated sites within the site boundary there are however, two statutory designated sites within 2km:
  - SAC River Ehen, 1.3km distance from site
  - SSSI River Ehen, 1.3km distance from site
- The site is not within an Air Quality Management Area;
- The Site is not in a High Landscape Value Area or within an Area of Outstanding Natural Beauty.



### 3. The Proposed Development

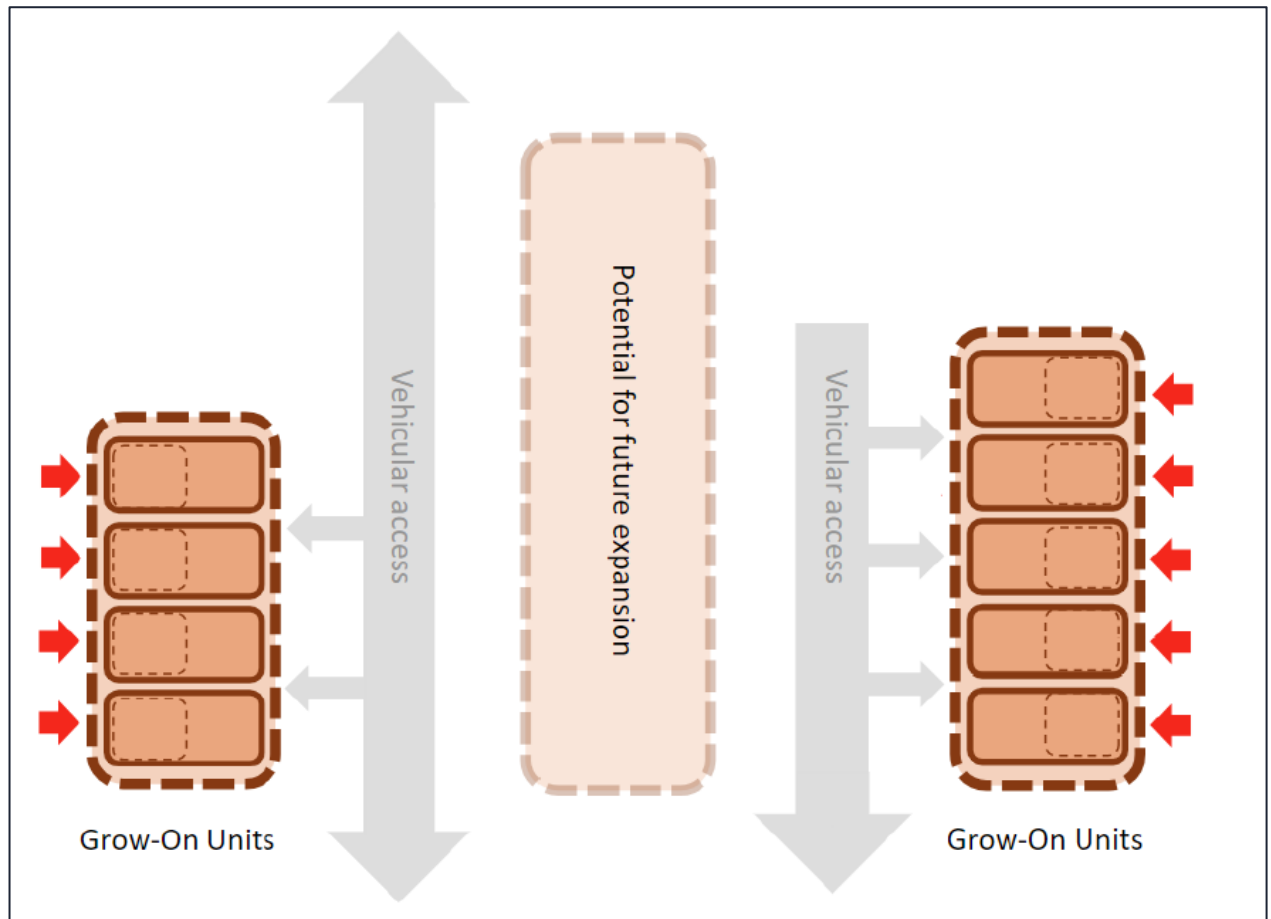
#### Background to the Proposals

- 3.1 Cleator Moor and the wider West Cumbria is highly dependent on the nuclear sector and in particular employment at Sellafield. The sector is forecast to experience a large contraction in employment and poor GVA growth, worsening in line with progression of the Sellafield nuclear decommissioning mission, and compounded by relatively low skills and a declining working age population.
- 3.2 The Industrial Solutions Hub (iSH) Programme is a response to these challenges led by Cumberland Council with the support of key stakeholders including the Nuclear Decommissioning Authority (NDA), Sellafield Ltd, Cumbria Local Enterprise Partnership (CLEP) and private sector supply chain partners. It seeks to improve the town of Cleator Moor and the region of West Cumbria through the creation of new employment opportunities, re-orienting the local economy to become more export-oriented and home to future centres of excellence.
- 3.3 The iSH programme's objective is to incentivise clean energy supply chain organisations to locate, grow, export, and diversify from West Cumbria. This is to be achieved through the development of a new business cluster - The 'Cleator Moor Innovation Quarter' (CMIQ). The appropriate location for the campus for this new nuclear and clean energy cluster has been identified as Leconfield Industrial Estate. CMIQ will host a new enterprise campus providing bespoke accommodation that will be a focus for collaboration, innovation and diversification across nuclear and engineering sectors. The CMIQ will facilitate the creation of a networked cluster of public, private and academic organisations, growing, diversifying and exporting products and services from Cumbria into new nuclear and non-nuclear markets. CMIQ will also provide the physical location for companies seeking to relocate or expand in the area.
- 3.4 Investment in CMIQ will remove barriers to local job creation, raise skills levels and aspiration, attract private sector investment through cluster development and connect local residents to opportunities. It will maximise the potential of the iSH, accelerate and enhance change on Leconfield Industrial Estate and expand investment potential.

## Features of the Proposals

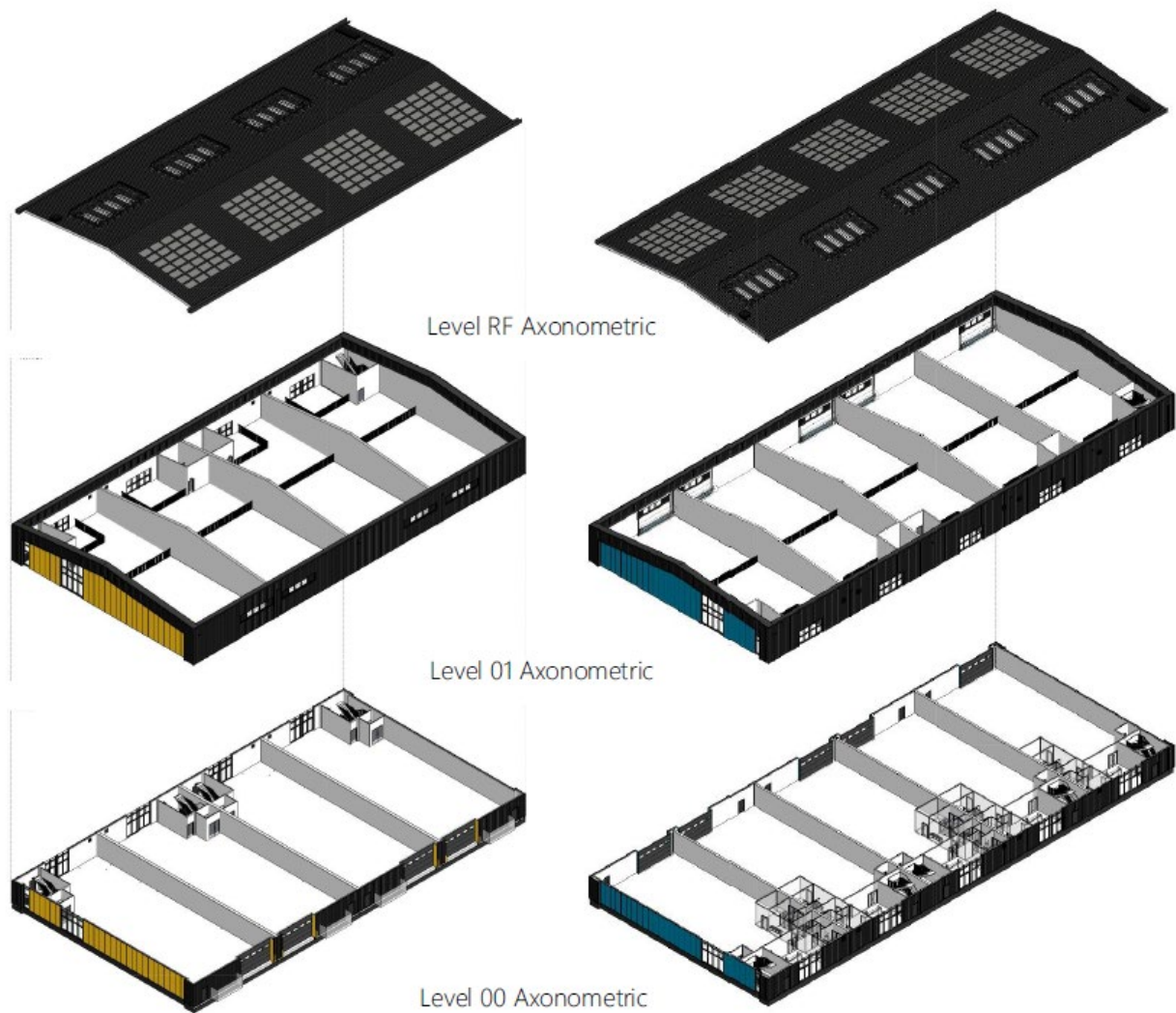
### Buildings

- 3.5 The proposed Plots 9 & 12 buildings will be 'Grow On' units. The intent is for businesses to grow and move nearby within the estate into larger more self-contained accommodation in the future. Both units will cater for businesses either in their growth stages and are sized accordingly.



**Figure 2: Site Concept**

- 3.6 The 'Grow On' units are arranged in parallel and accessed off a common shared courtyard space. These units have been conceived as double fronted, with public facing elevations to the outside, and a functional elevation addressing the service yard. The intention is for each unit to have a dedicated overhead sectional door providing access to a double height workshop space. Mezzanine floors are to be provided at approximately 50% of the ground floor area to be fitted out as open plan or cellular office space as required to serve the needs of these more established businesses.
- 3.7 The two blocks are designed as clear span portal structures to allow for ease of extrusion for potential expansion or subdivision in a variety of configurations to suit market requirements. Space between the two buildings will be kept clear for a potential additional grow-on unit.



**Figure 3: Proposed Building Forms**

- 3.8 The building forms proposed are efficient rectangular shaped blocks with recessed gables to the north and south. In the absence of identified tenants, flexibility of space is key for marketability. Therefore, the two blocks are designed as clear span portal structures to allow for ease of extrusion for potential expansion or subdivision in a variety of configurations to suit market requirements. Dual pitch roofs have minimal 6-degree pitches.
- 3.9 Units are double sided with both a public entrance and rear service entrance. There is a clear distinction between public / service with legible facades that provide clearly defined points of arrival for deliveries.
- 3.10 The two buildings utilise simple effective principles that include:
- A regular footprint that maximises the flexibility of space
  - A communal ethos across the site but with individual building identities
  - 'Live' frontages to the main access roads

- A clear distinction between public and private spaces but with permeable spaces between for safe congregation and use.
- Double height flexible workspace with single height support accommodation
- Cost efficiencies that offer good value
- Maximum opportunities for low carbon initiatives, including good daylighting, ventilation and accommodation of photovoltaic panels at roof level

3.11 The proposed buildings have Gross Internal Areas (GIA) of the following:

- Unit 9: 2,631sqm
- Unit 12: 3,550sqm

3.12 These then break down further into the following individual unit GIAs:

- Unit 9: 4no. 658sqm 'Grow On' units
- Unit 12: 5no. 710sqm 'Grow On' units

## Landscape



### Figure 4: Landscape Masterplan

3.13 Significant enhancements for biodiversity net gain, included within the site design include:

- Creation of semi-natural habitat and habitats of medium or higher distinctiveness within the site landscaping (including areas of open mosaic habitat, urban trees and broadleaved woodland).
- Enhancements to habitat condition, for example from poor or moderate to good (improving habitats on site), for retained habitats.

3.14 In addition to the on-site landscaping within the 'construction zone', landscaping and biodiversity enhancements are proposed for the 'BNG offsetting zone', including:

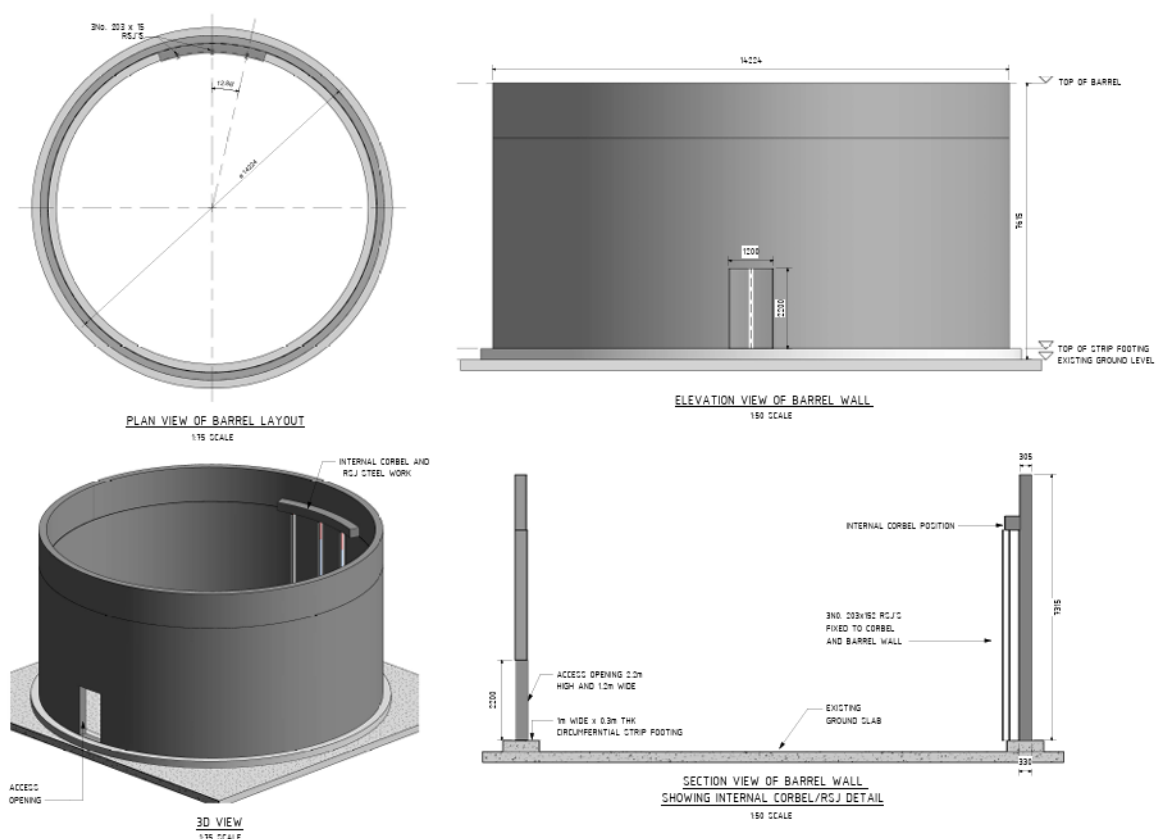
- Enhancement of existing habitats to create OMHoPDL will generate high distinctiveness habitat units which can be used to offset the loss of these habitats within the Main site.
- Inclusion of materials present onsite, such as re-use of soils, substrates, harvested seed and green hay.

3.15 Further information on the specific proposals for the BNG offsetting areas will follow the initial submission of this application. This approach has been discussed at length with the Local Planning Authority and has been confirmed as acceptable. The original planning strategy was to submit 2no. applications; 1no. application for the construction of the buildings and another to solely provide biodiversity enhancements to offset the BNG from the main application to achieve 10% net gain overall. However, following pre-application engagement with the LPA, a single planning application with 2no. distinct 'zones' was proposed to encompass both the construction and BNG offsetting.

## 4. Planning History

### Planning Application History

- 4.1 A review of the Council's planning application portal has been undertaken to understand any issues of relevance for the project arising from previous planning applications on and around the Leconfield site.
- 4.2 The most relevant application for the construction of Plots 9 & 12 is the temporary planning permission for the SPIDA site. Permission was granted on 2 September 2022 for temporary construction, testing and demolition of a mock chimney structure, erection of a demolition platform and associated works (application reference: 4/22/2256/0F1). This site is immediately adjacent to the proposed development area for Plots 9 & 12. However, this permission was granted on a temporary basis and it is understood the site will be vacated prior to the programmed start date for construction of Plots 9 & 12.



**Figure 5: SPIDA Planning Drawings**



## CMIQ Planning Application History

- 4.3 Due to scale of the regeneration of the estate, the planning strategy has involved numerous applications for different elements of the scheme. A brief planning history for the project to date is summarised in the table below.

**Table 1: CMIQ-Related Planning Application History**

Application No.	Site Address	Development	Decision
4/22/2184/001	LAND TO THE NORTH EAST OF LECONFIELD INDUSTRIAL ESTATE, CLEATOR MOOR (CURRENT BOC GASES SITE)	Outline Application for the Erection of a New Building up to 4,000sqm in Floorspace, for Various Uses With Associated Access, Car Parking, Landscaping and Engineering Works with Full Details of Scale and Access.	Approved 30 October 2024
4/22/2211/0F1	UNIT 1A	Works to Refurbish Existing Industrial Unit	Approved 6 July 2022
4/22/2212/0F1	UNITS 15A-H	Works to Refurbish Existing Industrial Unit	Approved 6 July 2022
4/22/2213/0F1	UNITS 20A-B	Works to Refurbish Existing Industrial Unit	Approved 6 July 2022
4/22/2161/0F1	LAND AT LECONFIELD INDUSTRIAL ESTATE, CLEATOR MOOR	Use of Land as Storage and Distribution Centre (Class B8) for Gas Bottles Together with the Siting of Two Single Storey Prefabricated Cabins for Administrative Use	Approved 4 August 2022
4/22/2170/0A1	LAND AT LECONFIELD INDUSTRIAL ESTATE, CLEATOR MOOR	Advertisement Consent for Single Totem Sign at Site Entrance	Approved 4 August 2022

## Community and Stakeholder Engagement

- 4.4 A number of public consultation events have been held as part of the wider proposals for Leconfield Industrial Estate.

### Drop-in Exhibition

- 4.5 An initial two-day drop-in exhibition was held in Cleator Moor in November 2021. At the event a series of consultation boards were presented setting out the background to the proposals, their design evolution and next steps. Feedback was actively sought from attendees and has been fed back into further design iterations prior to the submission of the application.
- 4.6 The first Drop in Exhibition generated a strong level of engagement and allowed for questions to be raised by the Cleator Moor community. Therefore, a second exhibition was held in March 2022 to respond to this engagement and provide clear answers and development of the project with residents.

**Targeted Stakeholder Meetings**

- 4.7 A series of individual meetings have been held with existing tenants of the Industrial Estate, adjacent landowners and other key stakeholders.
- 4.8 When dealing with an existing site with established tenants, a fundamental part of the brief is the need to establish who the existing tenants are, their business, their facility ambitions and the extent of the works associated to the existing buildings. This sets constraints as well as provides opportunities.
- 4.9 The overall vision and design proposals can only benefit if they are built from strong foundations of existing tenants who have chosen the Leconfield Industrial Estate as their base for business. Many of these are already running businesses directly related to the solutions driven engineering and manufacture or components.
- 4.10 The design team have therefore worked to establish and test the brief requirements of the existing tenants to try to envelope and accommodate these into the overall brief and vision.

**Pre-Application Discussions**

- 4.11 The development proposals have been subject to extended pre application discussions with Officers at Copeland Borough Council and Cumbria County Council (now combined as Cumberland Council).
- 4.12 A series of meetings have been held in relation to the proposals since January 2021, including biweekly meetings with senior planning staff. Key topics of discussion have included:
- Planning application format;
  - Emerging planning policy;
  - Highways and transport considerations;
  - Scale and design;
  - Proposed uses;
  - Ecology and habitat considerations.

## 5. Planning Policy Context

### Legislative Context

- 5.1 The Town and Country Planning Act (1990), Planning and Compulsory Purchase Act (2004) is relevant to the consideration of this application.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

### National Planning Policy

#### National Planning Policy Framework (2024)

- 5.3 The National Planning Policy Framework (NPPF) (December 2024) sets out the Government's planning policies for England and how these should be applied and is a material consideration in the determination of the accompanying planning application. The most pertinent policies relating to the principle of development at the site are set out below.

#### ***The Presumption in Favour of Sustainable Development***

- 5.4 The NPPF outlines that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three objectives which are interdependent and need to be pursued in mutually supportive ways:
- Economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - Social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - Environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.5 Paragraph 9 confirms that these objectives should be delivered through the implementation of Plans and the application of policies in the NPPF; however, they are not criteria against which every decision can or should be judged.

5.6 Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development”. For decision-taking this means:

*“c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) 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:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*

*ii. 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.” (Paragraph 11)*

### ***Building a Strong Competitive Economy***

5.7 Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

5.8 Planning policies should:

*“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*

*b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

*c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;*

*d) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*

*e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”*

(Paragraph 86)

- 5.9 Paragraph 87 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors. Including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

#### ***Promoting Sustainable Transport***

- 5.10 Paragraph 115 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

*“a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users;*

*c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance; and*

*d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”*

- 5.11 The NPPF requires all developments which generate significant amounts of movement to provide a Travel Plan, and Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed (paragraph 118).

#### ***Making Effective use of Land***

- 5.12 Paragraph 124 sets out that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment

and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land."

- 5.13 Paragraph 125 highlights that planning policies and decisions should "[...] give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land..."

### ***Achieving Well Designed Places***

- 5.14 Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- 5.15 Paragraph 135 requires planning policies and decisions to ensure that developments:

*"a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

- 5.16 Paragraph 136 highlights the importance of trees to the character and quality of urban environments, and how they can also help mitigate and adapt to climate change. It sets out that planning policies



and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

### ***Planning and Flood Risk***

- 5.17 Paragraph 170 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

### ***Conserving and Enhancing the Natural Environment***

- 5.18 NPPF Paragraph 187 notes that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity value whilst minimising impacts on and providing net gains for biodiversity. The intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland should also be recognised.

### ***Ground Conditions and Pollution***

- 5.19 Paragraph 196 of the NPPF states that planning decisions should ensure that the site is suitable for its proposed use taking account of ground conditions and risks arising from land instability and contamination and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).

- 5.20 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

*“a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*

*b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*

*c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” (Paragraph 198)*

- 5.21 Development will need to adhere to relevant limit values of national objectives for pollutants taking into account Air Quality Management Areas and Clean Air Zones (Paragraph 199).

### National Planning Practice Guidance

- 5.22 The NPPG complements the NPPF in terms of how the NPPF should be implemented in practice. The NPPG can be a material consideration in the decision-making process. The following categories of the NPPG are considered relevant in the consideration of this proposal:

- Design: Process & Tools
- Determining a Planning Application
- Effective Use of Land
- Flood Risk and Coastal Change
- Land Affected by Contamination
- Natural Environment
- Travel Plans, Transport Assessments & Statements

### Local Planning Policy Framework

- 5.23 The Site is located within the former area of Copeland Borough Council now part of Cumberland Council – a new unitary authority formed in April 2023, also comprising the former districts of Allerdale and Carlisle. The Statutory Development Plan for Copeland is the Copeland Local Plan 2021-2039 (adopted November 2024).
- 5.24 Minerals and Waste policy across Cumbria is established by the Cumbria Minerals and Waste Local Plan 2015-2030 (adopted September 2017).
- 5.25 The Council is currently in the process of preparing a new Local Plan which would cover the entire Cumberland Council administrative area. Once adopted, this would supersede the current Copeland Local Plan, in addition to the Local Plans for the former Allerdale and Carlisle administrative areas. The emerging Local Plan is currently at an early stage of preparation so no draft policies have been published which would be relevant to the site.

### Copeland Local Plan 2021-2039 (adopted November 2024)

- 5.26 The following policies of the adopted Local Plan have been identified as relevant:
- 5.27 **Strategic Policy E4: Cleator Moor Innovation Quarter at Leconfield** allocates Leconfield Industrial Estate and adjacent land to accommodate the Cleator Moor Innovation Quarter business cluster. The primary uses on the Cleator Moor Innovation Quarter development will be limited to Use Class B2, Use Class B8 and Use Class E(g) only. Community infrastructure, community facilities and ancillary uses, to support to the primary uses on the development will be supported within a single building or

small cluster of buildings within the development to act as a focal point for the development and local community. This could include uses such as café/restaurant, meeting spaces and education/training spaces (i.e., Use Classes E(b), E(d), E(f), F1(a) and F1(e)).

- 5.28 **Policy DS4: Design and Development Standards** sets out the Council's expectation for new development to meet high-quality standards of design, including measures such as: creation and enhancement of locally distinctive places sympathetic to surrounding context; use good quality building materials that reflects local character and vernacular, sourced locally where possible; support good health and well-being by incorporating high quality, inclusive and useful open spaces and providing high levels of residential amenity; create layouts that encourage walking and cycling; provision of safe and accessible pedestrian routes; create opportunities that encourage social interaction; be of flexible and adaptable design; maximise solar gain; and address land contamination and land stability.
- 5.29 **Policy DS5: Hard and Soft Landscaping** sets out the requirement for appropriate high-quality landscaping scheme with proposals for development, including a management plan, details of the position, species and number of new trees and any hard landscaping proposed including materials, levels etc.
- 5.30 **Policy DS7: Sustainable Drainage** seeks that new development incorporates sustainable drainage systems where appropriate.
- 5.31 **Strategic Policy N3: Biodiversity Net Gain** sets out the Council's requirement for all development to provide a minimum of 10% biodiversity net gain over and above existing site levels.
- 5.32 **Strategic Policy CO4: Sustainable Travel** states proposals must include safe and direct connections to routes that promote active travel, such as cycling and walking routes where appropriate. Developments that are likely to generate a large amount of movement will be required to secure an appropriate Travel Plan and be supported by a Transport Assessment in line with the Cumbria Design Guide.
- 5.33 **Policy CO5: Transport Hierarchy** requires new developments to promote the following hierarchy of users (highest priority first):
- a) Pedestrians
  - b) Cyclists
  - c) Public and community transport users
  - d) All other vehicles

- 5.34 **Policy C07: Parking Standards** requires new development to provide adequate parking provision, including cycle parking and accessible parking bays, in accordance with the Cumbria Development Design Guide.

### Local Plan – Emerging

- 5.35 Following the formation of the Cumberland Council unitary authority, the Council have commenced work on a new Cumberland Local Plan for the district (excluding the Lake District National Park area). This plan will shape the future development of the area providing a framework for the scale and location of new housing, employment, and infrastructure.
- 5.36 It will include other policies that guide development addressing issues such as minerals and waste, the protection of the historic and natural environment, and the social and economic needs of local communities. When adopted the plan will replace the existing Copeland, Carlisle, and Allerdale Local Plans and the Cumbria Minerals and Waste Local Plan.
- 5.37 The Council informed stakeholders of their intention to prepare a new Local Plan for Cumberland in September 2024. The Council are yet to undertake a formal consultation on the emerging Local Plan but are currently undertaking a call for sites exercise which seeking the submission of potential development sites for a range of uses and is open until 4 January 2026.

## 6. Planning Appraisal

6.1 From the planning policy review the following policy considerations have been established as pertinent to the determination of the planning application proposals:

- The Principle of Development
- Other Material Considerations
  - Access and Transport
  - Flood Risk and Drainage
  - Ecology
  - Trees
  - Design and Impact on the Character of the Area
  - Residential Amenity

6.2 Each of these matters will be discussed in turn.

### Principle of Development

6.3 The starting point for assessment of planning applications as set out by S38 (6) of the Planning and Compulsory Purchase Act 2004 is the adopted Development Plan unless material considerations indicate otherwise.

6.4 The Statutory Development Plan for Copeland is the Copeland Local Plan 2021-2039 (adopted November 2024). The Council is currently in the process of preparing a new Local Plan, however this is at an early stage of preparation so no draft policies have been published which would be relevant to the site. The adopted proposals map shows the Site is:

- Located within the settlement boundary of Cleator Moor, a 'Key Service Centre' where development, in particular employment development, is acceptable in principle subject to other considerations (Policies DS1 and DS2).
- Located within Cleator Moor Innovation Quarter Area 1, within which development of Class B2, B8, E(g) is considered acceptable in principle, subject to other considerations (Policy E4).

6.5 The Proposals seek full planning permission for two blocks of accommodation for new and emerging businesses to complement and support the wider Cleator Moor Innovation Quarter as a thriving new business cluster. The GIA of the combined blocks will be 6,181sqm.

- 6.6 The wider site will be landscaped to create open space and biodiversity enhancement areas and provide car parking and pedestrian routes.
- 6.7 The Proposals therefore wholly accord with adopted Local Plan Policies E4, DS4, DS5, N3, CO4, CO5 and CO7 in being in an appropriate, sustainable, and preferred location for employment development.
- 6.8 In addition, the Site comprises of previously developed land, which has been vacant and underused for several years. By redeveloping the Site to accommodate new employment uses the Proposals accord with NPPF Paragraphs 124 and 125 which prioritise the reuse of brownfield land to encourage prosperous economic growth.
- 6.9 As such the principle of development of the site is considered acceptable in terms of its location and proposed use. The remainder of this Statement will discuss how the proposals are acceptable with regards to other technical material considerations.

### **Access and Transport**

- 6.10 The application is accompanied by a Transport Assessment (TA) and Interim Travel Plan prepared by Curtins. The TA illustrates that the site is in an accessible location for pedestrians, cyclists and public transport users. Facilities at Cleator Moor are within a reasonable walking distance with nearby settlements of Whitehaven, Moor Row, Frizington and Egremont within a reasonable cycling distance. Buses are available which provide regular and frequent services to Whitehaven, Workington, Maryport and Egremont.
- 6.11 The proposed development will be safely connected to, and well-integrated with, the local highway network. Vehicular access to the site will be provided from the main estate road which serves Leconfield Industrial Estate, connecting to the B5295 to the south. The internal roads will be privately owned and maintained by the applicant.
- 6.12 Good-quality pedestrian and cycle connections will be provided between the site and the surrounding areas, with appropriate provision for disabled people and those with restricted mobility. The new routes will be fully integrated with the wider sustainable transport networks and will enable access from the site to high-quality public transport services. Safe and suitable access to the site will therefore be achievable for all users.
- 6.13 The internal layout of the site (including parking provision) will be designed in accordance with the adopted local guidelines and standards at the reserved matters stage. The impact of the proposed development on the future operation of the highway network has been accurately assessed using



modelling software. It has been demonstrated that the traffic flows associated with the proposed development will be satisfactorily accommodated on the highway network without resulting in any residual cumulative impacts which are “severe”.

- 6.14 A detailed review of road injury accident data has been undertaken and no highway safety concerns have been identified that will be materially affected by the proposed development.
- 6.15 In summary, the proposed development accords with both national and local planning policy from a highways and transport perspective.
- 6.16 Paragraph 116 of the NPPF states 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. In this case, the proposed development will result in no unacceptable or severe impacts and, as such, there is no justification for refusing this planning application on highways grounds.
- 6.17 Overall, it is considered that the proposals accord with the NPPF and Local Plan Policies CO4, CO5 and CO7 with regards to ensuring safe and efficient access by all users and encouraging sustainable modes of travel.

### **Flood Risk and Drainage**

- 6.18 The application is accompanied by a Flood Risk Assessment (FRA), Drainage Philosophy and SuDS Management Plan prepared by BGP.
- 6.19 The FRA confirms that the site is wholly in Flood Zone 1. Flood Zone 1 is land that is assessed as having less than a 1 in 1000 (0.1%) chance of flooding each year. Consequently, risk of flooding from fluvial sources is categorised as low.
- 6.20 Similarly the Surface Water Flooding map for Planning shows that the site is at Very low (<0.1%) risk to surface water flooding. As such the risk of flooding from overland sources is categorised as low.
- 6.21 With regards to the proposed drainage strategy, due to existing ground conditions which comprises of made ground underlain by slag and fused slag, infiltration would not be a feasible option. As such, in accordance with the drainage hierarchy it is proposed that surface water from the development will discharge into the adjacent Nor Beck.
- 6.22 Subject to agreement it is proposed that discharge into Norr Beck is to be restricted to a brownfield rate of 70.0l/s. Due to the lack of available open space within the site it is proposed that attenuation is

accommodated via a sub-surface attenuation tank with volume to retain the 1 in 100 years + 50% climate change.

- 6.23 The proposed foul drainage will remain private within site. The foul sewers are to drain via gravity to existing foul sewers within the adjacent existing access road. The flows thereafter will pass through the private network ultimately discharging to the existing United Utilities 675mm diameter combined sewer to the northwest of site.
- 6.24 As the site is at low risk of flooding and the proposed drainage strategy will not increase risk of flooding on or off-site the proposals are in full accordance with NPPF Paragraph 170 and Local Plan policy DS6 in respect of minimising flood risk.

## Ecology

- 6.25 The application is accompanied by an Ecological Assessment prepared by Tetra Tech which concludes that the site can be delivered in compliance with local and national ecological policies, provided that the recommended avoidance, mitigation, compensation and enhancement measures are adopted.
- 6.26 These measures include (but are not limited to) pre-construction species checks, retaining habitats and refugia on site where possible, installation of bat and bird boxes, and achieving 10% biodiversity net gain.
- 6.27 A Biodiversity Net Gain Assessment Report & Metric has also been prepared for the site by Tetra Tech. This assessment concludes that the baseline value of habitats within the **construction zone** is 20.20 habitat units. Two high value habitats (Open Mosaic Habitat on Previously Developed Land (OMHoPDL) and Wet Woodland) are present within the **construction zone**. It is proposed that these habitats are replaced by the same type. The baseline value of the **BNG offsetting** zone is 22.56 habitat units.
- 6.28 The post-development value of the **construction zone** is calculated to be 7.11 habitat units and 4.07 hedgerow units. This represents a total net unit change of -13.09 habitat units and +4.07 hedgerow units and an overall percentage change of -64.8% habitat units.
- 6.29 The post-intervention value of the **BNG offsetting** zone is calculated 37.72 habitat units. This represents a total net unit change of +15.16 habitat units.
- 6.30 The total percentage change across the site as a whole comprising both the **construction zone** and **BNG offsetting zone** is calculated to be 10.25% net gain, meeting the habitat trading rules and all other requirements of the NPPF and Environment Act, as well as Local Plan Policies N1 and N3.

## Trees

- 6.31 The application is accompanied by an Arboricultural Impact Assessment and Tree Protection Plan prepared by Tetra Tech. Please refer to these documents for more details on potential impact to tree and mitigation and protection proposed.
- 6.32 The trees proposed to be retained will require protection from alterations in ground levels and compaction of soils during the build phase and subsequent landscaping.
- 6.33 The proposal may affect retained trees, both on and off-site if appropriate protective measures are not taken and put in place. However, necessary precautions to protect the retained trees will be implemented.
- 6.34 Therefore, there should be no significant impacts on the contribution of retained trees to the local amenity or character of the wider setting. As such, the proposals should be considered in accordance with Local Plan Policy N14 and the NPPF para 136.

## Design and Impact on Character of the Area

- 6.35 Local Plan Policy DS4 and NPPF Paragraphs 131 and 135 require that the design of development proposals respond appropriately to the site and surrounding context. The existing site is located within an established industrial estate and comprises of previously demolished industrial structures and is immediately adjacent buildings currently in industrial use. Overall, there is little architectural merit in the immediate vicinity of the site.
- 6.36 The proposed building height of 9.6m on Plot 12 and 15m on Plot 9 allows for double height workshop space and mezzanine floors within each unit. This build height has also been informed by consideration of existing topography, tree cover surrounding built environment and other physical site constraints. It is also noted that consequently a building of 9.6mm in this location will have no impact on the setting of the Town Centre Conservation Area.
- 6.37 The proposed buildings are 2 storey, with vaulted ceilings which is in keeping with the general massing across the Leconfield Industrial Estate. The ground floor to mezzanine and mezzanine to eaves heights are both 4m, which is appropriate for the proposed light industrial function of the buildings and the servicing and structural requirements. The overall width of the building is approximately 33m and the units have an approximate 2:1 ratio proportion length/width.
- 6.38 Given the above considerations it is considered that the proposals accord with the principles of good design as set out at Local Plan Policy DS4 and NPPF Paragraphs 131 and 135.

## **Residential Amenity**

- 6.39 Given the site's visual containment, the nature of proposed operations and separation from residential properties, it is considered that there will be negligible impact on the levels of amenity currently enjoyed by neighbouring residential properties or environmental health more widely resulting from noise, light, ground contamination, air quality or visual impact. The proposals therefore accord with NPPF Paragraphs 131, 187 and the Local Plan in protecting residential amenity and environmental health.

## 7. Conclusion

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications for planning permission be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 7.2 This Planning Statement has set out how the proposed development accords with the NPPF and the relevant policies of Copeland Borough Council's (now Cumberland) adopted Development Plan.
- 7.3 This application seeks approval of the proposed development:

*"Full planning permission for the erection of 2no. buildings for B2 general industrial and ancillary office use, comprising 6,356sqm GEA floorspace, associated car parking, hard and soft landscaping, associated infrastructure and landscaping and biodiversity enhancements across the wider Leconfield estate."*

- 7.4 The site is an allocated employment site in the key service centre of Cleator Moor as defined in the adopted Development Plan where development for employment uses is considered acceptable. In this regard the principle of development has been established and is considered acceptable.
- 7.5 Furthermore, in relation to the technical surveys undertaken on the site have demonstrated:
- that the proposals will not severely impact the surrounding highways network and that no junction mitigation is required.
  - no notable or protected species are present on the site and that with appropriate management in place during construction there will be no significant impact on local wildlife.
  - there will be no significant visual impact given existing tree cover and topography, notably due to intervening buildings the site is obscured from the conservation area.
  - the proposals accord with national and local planning policy objectives that prioritise the reuse of vacant brownfield land and will assist in the economic regeneration of Cleator Moor and West Cumbria more widely by facilitating the prompt delivery of the CMIQ proposals.
- 7.6 Overall, the proposals will not result in harm that would outweigh the benefits of granting permission.

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