



## CUMBERLAND COUNCIL DELEGATED PLANNING DECISION

1.	<b>Reference No:</b>	4/24/2051/0F1	
2.	<b>Proposed Development:</b>	ERECTION OF A NEW DWELLING AND ASSOCIATED EXTERNAL WORKS (RESUBMISSION)	
3.	<b>Location:</b>	LAND ADJACENT TO STONEYCROFT, SEA MILL LANE, ST BEES	
4.	<b>Parish:</b>	St. Bees	
5.	<b>Constraints:</b>	ASC;Adverts - ASC;Adverts, Coal - Off Coalfield - Data Subject To Change, Key Species - POTENTIAL AREA for the Small Blue, Outer Consultation Zone - Sellafield 10KM	
6.	<b>Publicity Representations &amp; Policy</b>	Neighbour Notification Letter	Yes
		Site Notice	Yes
		Press Notice	Yes
		Consultation Responses	See Report
		Relevant Policies	See Report
7.	<b>Report:</b> <b>Site and Location</b>	<p>This application relates to land adjacent to Stoneycroft, located off Sea Mill Lane to the south of St Bees. The application site is steeply sloping facing west towards the sea and forms part of the southern curtilage of Stoneycroft. Stoneycroft is a detached dwelling which also fronts west and is accessed from Sea Mill Lane with its access drive running along the west/front elevation of the dwelling. There is a public right of ways which runs from the beach front</p>	

across the front of the application site.

### **Relevant Planning History**

4/23/2035/0F1 – Erection of a new dwelling and associated external works – Withdrawn.

### **Proposal**

This application seeks planning permission for the erection of a detached dwelling and associated external works. This is a resubmission of the withdrawn application ref: 4/23/2035/0F1.

The proposed detached dwelling will be built over three floors and will be constructed into the existing sloping landform to the rear of the site which will require the removal of a significant area of existing land and the construction of retaining walls to accommodate the build.

The main part of the dwelling will measure 14.3m x 8.4m, with an eaves height of 4.2m and an overall height of 8.6m. The main part of the dwelling will benefit from a front gable which will project from the front elevation by 0.4m and will extend along the frontage by 6.6m. It will have a maximum eaves height of 6.8m and an overall height of 9.2m. The dwelling also benefits from a rear facing gable which will measure 3m x 8.2m and will reflect the height of the front facing gable. The development will also include a side projection which will extend from the north gable by 2.8m and will extend along this elevation by 6m, with an eaves height of 4.8m and an overall height of 6.4m.

Internally, the lower ground floor of the development will incorporate a lobby, a large garage/workshop and store. The upper ground floor will accommodate an office, toilet, utility room, bedroom/study, a kitchen, and a dining/living room. The first floor of the proposed dwelling will incorporate two double bedrooms with ensuite bathrooms, a bathroom, and a large double bedroom with a dressing room and ensuite bathroom. The front gable of the dwelling will incorporate an upper ground and first floor balcony, serving the kitchen and bedroom 2. A raised patio will also be located to the south elevation accessed from the living/dining room and will be enclosed by a glazed screen.

Externally, the development will be finished with roughcast render and local red sandstone to the walls, blue/black natural slate to the roof, natural stone sills, lintols, and string course, UPVC windows, and composite doors. The proposal will also incorporate 8 solar panels along the front roof slope of the proposed dwelling.

The proposed dwelling will be accessed via the existing driveway serving the residential dwelling, Stoneycroft, from Sea Mill Lane. The existing driveway will continue to serve both properties and will be retained in its existing location along the western section of the site. Both the existing and proposed property will then be served by two external parking spaces. The parking spaces for the proposed dwelling will be located to the north of the application site.

It is proposed that the foul and surface water from the development will drain to the existing



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main sewer on Sea Mill Lane.

### Consultation Responses

#### St Bees Parish Council

St Bees parish Council have submitted an objection via a Planning Consultant. The following is a summary of the concerns raised:

- On consideration of development plan policy and other material considerations, it is the conclusion of this statement that the proposed development does not comply with provisions of the development plan and raises issues in respect of those other material considerations. There is a sound basis on which to refuse the application.
- The application site is described as being at the end of Sea Mill Lane surrounded by residential dwellings. This is clearly not the case as space to the west is occupied by the railway with no above ground level structures, and to the south and east by open undeveloped land.
- Sea Mill Lane runs south west from the centre of village, with residential properties on either side of the road for the first 400m. A consistent ribbon of residential development then extends for a further 175m to the south, with open countryside on the eastern side of the road and housing to the west.
- With limited exception, these properties are generally modest single storey buildings, set a lower level than the road and clearly established to exploit the views west over the Irish Sea. Along this stretch the road narrows and towards the end of the ribbon the footpath disappears. The lane has evolved from a track over time and has not been built to any highway standards. It is not of a standard which would normally encourage use by pedestrians or cyclists in the conduct of their daily, domestic business.
- The application site is outside the settlement boundary for St Bees.
- Notwithstanding the extensive design analysis provided in the Design and Access statement, there is limited description of the precise form, scale and nature of the proposed development.
- The application form describes the application site as existing garden. Whilst the site maybe within the ownership of the applicant, it is clearly not part of the residential curtilage and visually forms part of the extremely steep vegetated bluff which runs to the rear of the existing houses and then south from Stoneycroft. The slope rises 12.5m from Sea Mill Lane to the rear of the at an angle of 85° or 62%.
- The application form describes the development as a new dwelling with associated external works. There is no clear submission elsewhere within the application to show the extent and nature of these works.

- Review of drawings suggests that the development will require the removal of at least 900m<sup>3</sup> of the cliff. There is no description or analysis of the nature of works necessary to stabilise the exposed rock face.
- It is noted NPPF 189 identifies land stability issues as a material planning consideration with responsibility for securing a safe environment resting with the developer and landowner. A detailed geophysical appraisal of the site is essential to understand the exact implications of the engineering works proposed and the way in which the slope might be managed should the development proceed. This should include detail of retaining features, which are likely to be substantial development in their own right.
- Plans submitted with the application suggest that access to the highway is unaltered. It is altered as separated points of access are to be provided for the host and the proposed dwellings.
- The submission of details of foul and surface water drainage are noted, as is the holding objection of United Utilities to the submissions made with the application.
- The results of a percolation test carried out on the site suggest that ground conditions are not suited to the use of soakaways. This also implies that runoff from higher land above the site of the proposed dwelling will need to be taken into account to accommodate the dwelling, without impact on the local environment. In addition to assurance that the considerable amount of excavation proposed leaves exposed faces in a safe and stable condition, the impact on local hydrology should also be considered.
- The Preliminary Ecological Report submitted with the application is not questioned, although it is noted that it was completed in October 2022 and it may be considered that a review to ensure that it remains is necessary.
- Given the location and complexity of the proposed development it is considered that the description provided and the level of analysis of considerations material to the determination of the application are lacking.
- An application for proposed development identical to that now proposed was submitted in 2023 and considered under reference 4/23/2035/OF1. This application was withdrawn prior to determination. There is no record on the public file as to why this was the case. There is similarly no record of the advice provided by officers prior to the submission of the application under consideration here.
- The applicant provides reference to development at Strandby House permitted by a planning permission 4/04/2275. No information is provided as to the relevance of this permission to the current proposal so no weight can be given to this.
- The applicant makes reference to a number of appeal decisions which might be taken into account when considering this application. No specific details are provided of the

location or substance of these decisions. Again no weight can be given to this.

- Whilst the Council has experienced issues relating to housing supply, this has largely been resolved through interim policy and reference to later versions of the SHLAA. This means that the provisions of paragraph 11 of the NPPF which provide for a presumption in favour of sustainable development – and a presumption against development which is not – still rely on the provisions of a local plan even where the end of the plan period has been reached. Paragraph 11d. In other words the provisions of the 2013 Plan remain relevant in terms of the location of the application site beyond the settlement boundary of St Bees as currently defined. (see Peel Investments (North) Ltd v Secretary of State for Housing, Communities & Local Government [2020] EWCA Civ 1175).
- Given the Council's housing delivery which has exceeded targets. In this context whether the Council's decision to grant planning permission for residential development on land adjacent to but not within settlement boundaries constituted a legitimate approach. It is certainly now the case that adopted settlement boundaries provide a robust and policy compliant basis to resist new development.
- The applicants are effectively arguing that the settlement boundaries defined in the development plan can be given no weight and definition will only come when a new plan is adopted. This is a misinterpretation of the approach to be applied when giving weight to adopted and emerging development plans. The argument is further weakened by the fact the submission draft of the local does not propose alterations to this part of the St Bees settlement boundary.
- Policy DS4PU has been modified in terms of some detailed wording but critically reinforces the established settlement boundary, which has been the subject of review and testing against the criteria established in the formulation of the updated Copeland Plan.
- Paragraph 48 of the NPPF provides guidance on the weight to be given to an emerging plan. Given the stage reached by the emerging Copeland Local Plan 2021-2038 little or no weight can be afforded to its policies.
- It is clear that the proposed development is inconsistent with both existing and emerging development plan policy. Development is contrary to provisions of the development plan which remain a relevant and appropriate starting point for the decision making process. The proposed development is not sustainable in terms of policy ST1 or paragraph 8 of the development plan.
- Further the development fails to satisfy the more detailed policies of the Local Plan. The application site lies outside any site allocated for development including tourist development.
- It is considered that until it is superseded weight can be given to the 2013 Local Plan

including policies ST1 and ST2 and the settlement boundaries to which they relate.

- The Council has previously raised concern over the need to amend settlement boundaries to meet the requirements of the Housing Needs Assessment carried out for the 2013 – 2038 plan period and has accepted in some cases that this might enable development outside of the existing boundaries. It is not considered that this can be interpreted as abandonment of policy of the extant development plan, but might enable some weight to be given to other material considerations, where the absence of any clear harm, or benefit might be weighed in the planning balance.
- The position of the boundary relative to the application site has not changed from since the adoption of the 2013 plan, through the preparation and issue of the submission version of the 2021 Local Plan and now in the proposed modifications. It may be concluded that considerable weight can be afforded to the justification for the position of the St Bee's settlement boundary. Development outside that boundary can justifiably be resisted with reference to policy ST2.
- The application site is not adjacent to the settlement boundary but lies some 110m south. Again, it must be reiterated that this boundary has been the subject of scrutiny and review as the 2021 Local Plan has emerged and no change has been found necessary.
- The applicant seeks justification for this proposal on the back of unspecified appeal decisions. The extent to which these appeals are relevant to the current case needs to be judged in the context of the date of the decisions in early 2023 prior to the completion of actions emerging of the Local Plan Examination, prior to the issue of the Inspectors post hearing letter in June 2023 and prior to the issue of Main Modifications. The decisions also pre-date the release of the December 2023 version of the NPPF.
- The site does not have any apparent former use. It may be the applicant's ownership, but this is not the same as being within the curtilage.
- The proposed development would consist of a building which is much larger and taller than its neighbours. It is disproportionate in scale in comparison to its neighbours. It is acknowledged that architecturally the area offers little of merit, but it does present a character and scale of development which is not reflected in the proposal.
- The proposal would extend development into the open countryside, the open escarpment which presents to the street, the footpath and views back from the shore of the coast, including those parts of the coast with landscape and ecological designations.
- The proposed development, particularly in the context of the extent of engineering works necessary to create the development site, would have an adverse impact the character and appearance of the area.



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- It is clear that the proposal is not sustainable development and is inconsistent with the provisions of the development plan.
- The proposal would result in harm to the character and appearance of the area and as such would be contrary to the specific development plan policies designed to protect that character and appearance. The development would fail to contribute to the delivery of the high quality, beautiful place now specifically highlighted in the latest version of the NPPF.

### Cumberland Council – Local Highway Authority & Lead Local Flood Authority

#### Highways:

The layout details shown on the submitted plan are considered satisfactory from a highway perspective. I can therefore confirm that the Local Highway Authority has no objection to the proposed development.

However, a PROW public footpath number 423012 runs through the site, the Applicant must ensure that no obstruction to the footpath occurs during, or after the completion of the site works.

#### LLFA:

It is noted that retaining walls are proposed due to the land levels behind the proposed development meaning it will sit below the existing field levels. We advise that there is consideration for sufficient drainage around the rear of the boundary of the development area to prevent surface water running off the land and effecting the property.

### United Utilities

Following our review of the submitted Drainage Layout (ref 05-7967-D, Rev A, dated Jan 23) the plans are not acceptable to United Utilities. This is because surface water is proposed to drain to the public sewer network, however there is a watercourse near the site (to the south). We would expect surface water to discharge directly to watercourse.

Should planning permission be granted we request the inclusion of a condition to secure a sustainable surface water and foul water drainage scheme for the development.

### Natural England

Thank you for consulting Natural England on this application. Proposal 4/24/2051/0F1 is in close proximity to St. Bees Head Site of Special Scientific Interest (SSSI). Natural England have reviewed the relevant documents and provide the following advice:

As construction will be taking place in close proximity to St. Bees Head SSSI a Construction Environmental Management Plan (CEMP) will need to be secured through Condition to detail the pollution prevention measures that will be implemented during the works. Appropriate pollution prevention guideline measures should include materials and machinery storage, biosecurity, and the control and management of noise, fugitive dust, surface water runoff and waste to protect any surface water drains and the SSSI from sediment, and pollutants such as fuel and cement. The respective developer would also be required to produce a management plan on how they propose to manage surface water run-off in conditions of heavy rainfall to prevent pollution of the SSSI.

Natural England advises that dust reduction activities are applied during all construction stages of the development, and a dust management plan should be prepared to control fugitive emissions during construction activity. There must be a 10-metre buffer strip to the SSSI, and a bund is required to be installed to prevent any sediment and pollution in surface water run-off from reaching SAC due to the gradient of the development site. All materials and equipment must be stored outside the buffer strip, and there should be a designated concrete mixing/refuelling site outside the buffer strip, with spill kits on site and drip trays used for refuelling.

St. Bees Head SSSI is an important site for breeding birds. Therefore, the developer should conduct pre-construction work checks of the development site to ensure breeding birds are not present on site. If breeding birds are found to be present, then all construction works should cease immediately.

#### Cumberland Council – Countryside Access Officer

Public Right of Way FP 423012 is located within the proposed development site and forms part of a well-used circular walking route from St Bees village (See attached plan).

This section of the right of way also forms part of the King Charles III England Coast Path which is a National Trail which once fully established will stretch for 206 miles along the Cumbria coast.

The King Charles III England Coast Path between Whitehaven and Silecroft opened to the public in March 2021 by order of the Secretary of State.

In their Design and Access Statement the applicant recognises that there is a public footpath to the western boundary running between the site and the railway line and that St Bees is located on the England Coast Path.

The Design and Access Statement also highlights that the design concept and principles for the dwelling have also taken into consideration measures to protect privacy from the public footpath.





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However, the application provides no information on what measures will be put in place to protect FP 423012 and the King Charles III England Coast Path during and after construction which is unacceptable and needs to be addressed.

Once this information has been provided by the applicant, we will be better placed to provide a full response to the application.

### Cumberland Council – Resilience Unit

There are no objections to the proposed works.

### Public Representation

This application has been advertised by way of a site notice, press notice, and neighbour notification letters issued to seven properties and those who previously commented on the withdrawn application 4/23/2035/0F1.

Three letters of objection have been received in relation to the statutory notification procedure which raise the following concerns:

- Sea Mill Lane is becoming far too busy with traffic, has no paths, is frequently used by walers and the proposed site is also a public right of way then to add construction traffic down Seamill will result in chaos as well as being an accident waiting to happen.
- The road is already full of potholes and has no footpath, as there is no room for one.
- The application does not mention anything about the construction period for the site. The proposed house is built into the existing hillside, so there will be a vast amount of soil and rock to be removed from site before construction can begin. Then there will need to be a very large amount of concrete brought to site to buttress the remaining hillside. All this rock, soil and concrete can only be transported to and from the site via Sea Mill Lane, which is a very narrow lane, wholly unsuited to this amount of material.
- When Strandby House was built a few years ago, there was a similar problem, with heavy machinery and vehicles regularly up and down the Lane. This resulted in a number of water leaks from the water main, some subsidence of the lane (which has never been adequately repaired). The current proposal will at least double the amount of material to be transported to/from the site, which will inevitably result in significant further damage to the road.
- The access to Seamill Lane is very narrow at the top near the main street in St Bees. Ordinary sized lorries can not pass eg there is a separate smaller refuse collection bin due to the size.
- My property is some 200 to 250 metres from the proposed site, and my drive is one of the very few places where vehicles can cross in the narrow lane. As a result, my driveway is being steadily eroded by this traffic. If this building is allowed to go ahead, there will certainly be additional traffic and damage to my driveway. The alternative is to block off my driveway, which will make it very difficult for any traffic to cross in over

200 metres of the lane.

- The construction of the dwelling would also inevitably have a negative effect on the recently created England Coast Path, which currently runs through the driveway of Stoney Croft. The close proximity of the footpath to the site means that it will be virtually impossible for any construction work to not affect this popular path.
- The area in front of the proposed development is a public footpath and there is no area for parking.
- The adjacent house, Stoneycroft already has 4 vehicles, including a motorhome parked adjacent to the footpath so congestion during the construction and after completion would increase.
- As to the appearance of the house, the proposal suggest that it is in keeping with the other nearby houses. It can be seen from the photomontage that this is clearly not the case.
- The area where the dwelling is sited is effectively scrub land and therefore important habitat for wildlife including birds and this would further reduce the available wildlife area at that end of the village.
- There have been other houses for sale in the Lane. Would they not be better to be used rather than creating a further, large dwelling??
- Why are so many applications being submitted for St Bees.
- Continued proposals like this will ruin the village.
- So much for St Bees being a Conservation Area

### **Planning Policy**

Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

### **Development Plan**

On 1st April 2023, Copeland Borough Council ceased to exist and was replaced by Cumberland Council as part of the Local Government Reorganisation of Cumbria.

Cumberland Council inherited the local development plan documents of each of the sovereign Councils including Copeland Borough Council, which combine to form a Consolidated Planning Policy Framework for Cumberland.

The inherited the local development plan documents continue to apply to the geographic area of their sovereign Councils only.

The Consolidated Planning Policy Framework for Cumberland comprises the Development Plan for Cumberland Council until replaced by a new Cumberland Local Plan.

### **Copeland Local Plan 2013 – 2028 (Adopted December 2013)**



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### Core Strategy

Policy ST1 – Strategic Development Principles

Policy ST2 – Spatial Development Strategy

Policy SS1 – Improving the Housing Offer

Policy SS2 – Sustainable Housing Growth

Policy SS3 – Housing Needs, Mix and Affordability

Policy T1 – Improving Accessibility and Transport

Policy ENV1 – Flood Risk and Risk Management

Policy ENV3 – Biodiversity and Geodiversity

Policy ENV5 – Protecting and Enhancing the Borough's Landscapes

### Development Management Policies (DMP)

Policy DM10 – Achieving Quality of Place

Policy DM11 – Sustainable Development Standards

Policy DM12 – Standards of New Residential Developments

Policy DM22 – Accessible Developments

Policy DM24 – Development Proposal and Flood Risk

Policy DM25 – Protecting Nature Conservation Sites, Habitats and Species

Policy DM26 – Landscaping

### Emerging Copeland Local Plan 2021 – 2038 (ELP):

Cumberland Council are continuing the preparation and progression to adoption of the ELP.

The Local Plan Examination Hearing Sessions were completed in March 2023.

The appointed Planning Inspector issued their post hearing letter in June 2023, which identified the next steps for the examination.

The appointed Planning Inspector has now considered all representations and the discussions that took place during the Local Plan Examination Hearing Sessions in 2023 and has identified a number of amendments or 'modifications' that are required in order to ensure the ELP is sound i.e. positively prepared, justified, effective and consistent with national

planning policy.

A six week public consultation seeking views on the proposed modifications to the ELP commenced on Wednesday 14th February 2024 and closed on the 28<sup>th</sup> March 2024. The Planning Inspectors Report is now awaited.

As set out at Paragraph 48 of the National Planning Policy Framework (NPPF), Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan; the extent to which objections to relevant policies have been resolved; and the degree to which emerging policies are consistent with the NPPF.

Given the advanced stage of preparation of the ELP full weight can be attached to policies where no objections have been received or objections have been resolved. As the consultation on the main modifications to the ELP is now complete significant weight can also be afforded to the policies of the ELP where modifications are proposed.

Strategic Policy DS1PU: Presumption in favour of Sustainable Development

Strategic Policy DS2PU: Reducing the impacts of development on Climate Change

Strategic Policy DS3PU: Settlement Hierarchy

Strategic Policy DS4PU: Settlement Boundaries

Strategic Policy DS5PU: Planning Obligations

Policy DS6PU: Design and Development Standards

Policy DS7PU: Hard and Soft Landscaping

Strategic Policy DS8PU: Reducing Flood Risk

Policy DS9PU: Sustainable Drainage

Strategic Policy H1PU: Improving the Housing Offer

Strategic Policy H2PU: Housing Requirement

Strategic Policy H3PU: Housing delivery

Strategic Policy H4PU: Distribution of Housing

Strategic Policy H5PU: Housing Allocations

Policy H6PU: New Housing Development

Policy H7PU: Housing Density and Mix Strategic

Policy H8PU: Affordable Housing

Strategic Policy N1PU: Conserving and Enhancing Biodiversity and Geodiversity

Strategic Policy N2PU: Local Nature Recovery Networks



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Strategic Policy N3PU: Biodiversity Net Gain

Strategic Policy N6PU: Landscape Protection

Policy CO4PU - Sustainable Travel

Policy CO5PU - Transport Hierarchy

Policy CO7PU - Parking Standards and Electric Vehicle Charging Infrastructure

### **Other Material Planning Considerations**

National Planning Policy Framework (2023)

National Design Guide (NDG).

Cumbria Development Design Guide (CDG)

Strategic Housing Market Assessment 2021 (SHMA)

Copeland Borough Council Housing Strategy 2018 – 2023 (CBCHS)

The Cumbria Landscape Character Guidance and Toolkit (CLGC)

Copeland Borough-Wide Housing Needs Survey (2020)

### **Assessment**

The main issues raised by this application relate to the principle of the development; previous use of land; scale, design, and impact on residential amenity; settlement character, landscape and visual impact; access and highway safety; drainage and flood risk; impact on ecology; and ground conditions.

#### Principle of Development

Policies ST1 and ST2 along with Policies SS1, SS2, and SS3 of the CS, seek to promote sustainable development to meet the need and aspirations of the Borough's housing market. These policies further concentrate development within the defined settlement boundaries in accordance with the Borough's settlement hierarchy. The NPPF also seeks to support the Government's objective of significantly boosting the supply of housing through sustainable development.

The application site is located to the south of St Bees and is approximately 105m from the defined settlement boundary. Policy ST2 of the CS identifies St Bees as a Local Service Centre where the following is identified as appropriate: within the defined physical limits of development as appropriate; possible small extension sites on the edges of settlement; housing to meet general and local needs; and, affordable housing and windfall sites.

Policy ST2 seeks to restrict development outside the defined settlement boundaries to that which has a proven requirement for such a location, including 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.

Policy SS1 of the CS states the Council will work to make Copeland a more attractive place to build homes and to live in them, by 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.

Policy SS2 of the CS states that house building to meet the needs of the community and to accommodate growth will be provided for by: allocating sufficient land for new housing development to meet identified requirements within the Borough; 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; seeking densities over 30 dwellings per hectare, with detailed density requirements determined in relation to the character and sustainability of the surrounding areas as well as design considerations; and, seeking to achieve 50% of new housing development on previously developed sites.

Within the Emerging Local Plan, under Policy DS3PU St Bees continues to be identified as a Local Service Centre where development will be focused on existing employment allocations, moderate housing allocations, windfall and infill development.

Policy DS4PU of the ELP defines the settlement boundaries for all settlements within the hierarchy and states that development within these boundaries will be supported in principle where it accords with the Development Plan unless material considerations indicate otherwise. It is stated that to ensure the delivery of allocated sites is not prejudiced, development outside the settlement boundaries will only be accepted in the following cases: where the proposal is for housing and: the site is well related to and directly adjoins the settlement boundary of a town or Local Service Centre; and b) the site is or can be physically connected to the settlement it adjoins by safe pedestrian routes; and c) the Council is unable to demonstrate a 5-year supply of deliverable housing sites; or there has been previous under-delivery of housing against the requirement for 3 years or more or the proposal is for a specific type of housing supported by Policies H15PU (rural exception sites for affordable housing delivery), H16PU (essential dwellings for rural workers) or H17PU (conversion of rural buildings to residential use).

Policy H1PU of the ELP states the Council will work with stakeholders, partners and communities to make Copeland a more attractive place to build homes and live by: allocating a range of deliverable and attractive housing sites to meet local needs and aspirations and ensuring they are built at a high standard, whilst protecting the amenity of existing residents; approving housing development on appropriate windfall sites within the settlement boundaries where it accords with the Development Plan; and, ensuring a consistent supply of deliverable housing sites is identified through an annual Five-Year Housing Land Supply Position Statement.

Policy H2PU of the ELP outlines the housing requirement is for a minimum of 2,482 net additional dwellings (an average of 146 dwellings per annum) to be provided between 2021



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and 2038 and that In order to plan positively and support employment growth over the Plan period, the Plan identifies a range of attractive allocated housing sites, which when combined with future windfall development, previous completions and extant permissions, will provide a minimum of 3,400 dwellings (an average of 200 dwellings per annum) over the Plan period.

Policy H4PU of the EP outlines that 17% of new housing development will be located within the Local Service Centres.

Policy H5PU of the ELP allocates land for housing purposes.

The application site is located beyond the defined settlement boundary for St Bees as identified within the CS or ELP and is not allocated for housing development in the CS or ELP. The development comprises a market led new build house and does not therefore comprise an exception site for affordable housing, an essential dwelling for a rural worker or the conversion of a rural building.

Whilst the application site is located approximately 105m to the south of the defined settlement boundary for St Bees the site is not physically connected to the settlement by safe pedestrian routes There are no designated footpaths along the full length of Sea Mill Lane.

Overall, it is considered that the principle of the development is contrary to Policy ST2 of the CS, DS3PU and DS4PU of the ELP and paragraph 11 of the NPPF, creating residential properties in an area outside the designated settlement boundaries. The LPA can demonstrate a 5 year land supply and the Policies within the ELP reflect the guidance set out in paragraph 84 of the NPPF which seeks to resist unjustified housing in the open countryside.

### Previous Use of Site

Policy ST1 of the CS also encourages the reuse of existing buildings and previously developed land wherever possible, directing development away from greenfield sites where this is consistent with wider sustainability objectives.

Policy DS2PU of the ELP states that the Council will support development proposals that make a positive contribution towards achieving the Cumbria wide goal of net zero carbon by 2037 where they accord with the Development Plan. Developers are encouraged to consider making the most efficient use of land by building at appropriate densities and encouraging the sympathetic reuse and refurbishment of the existing building stock and previously developed land.

Section 11 of the NPPF promotes the 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, by utilising previously developed or brownfield land.

The applicant references within their supporting statement that the application site forms previously developed land as the land is within the curtilage of a developed structure and forms part of the existing residential garden. The NPPF however excludes residential gardens from their definition of previously developed land. Whilst the site may be within the

applicant's ownership, given its nature it does not appear to be brownfield land.

On this basis, it is considered that the proposed does not seek to reuse previously developed land.

#### Scale, Design, and Impact on Residential Amenity

Policy SS1 of the Copeland Local Plan seeks to make Copeland a more attractive place to build homes and to live through requiring new development to be designed and built to a high standard.

Policy DM10 of the Copeland Local Plan expects high standards of design and the fostering of quality places. It is required that development responds positively to the character of the site and the immediate and wider setting and enhance local distinctiveness. It is required that development incorporate existing features and address vulnerability to and fear of crime and antisocial behaviour.

Policy DS6PU of the Emerging Local Plan requires all new development to meet high-quality standards of design. This includes creating and enhancing locally distinctive places, the use of good quality materials that reflect the local character, including high quality and useful open spaces, providing high levels of residential amenity, adopting active travel principles, creating opportunities for social interaction, and effective use of land whilst maintaining amenity and maximising solar gain.

The proposed dwelling is to be located on land to the south of the existing dwelling known as Stonecroft. The proposal seeks permission for a large detached modern dwelling which is considered to be out of scale with the nearest neighbouring properties and does not reflect the character of the surrounding area. The proposed dwelling will be three storeys in height and will sit at an elevated position in relation to the adjacent properties. This will result in the development being a prominent feature particularly given that the surrounding properties are much smaller in scale and of a more muted/simple design. The property is modern in design and the use of large glazing elements within the front elevation of the proposal fails to reflect the traditional character of St Bees and does not reflect the solid void relationships found within traditional properties and those adjoining the site.

The proposed dwelling is to be located 16m from the existing dwelling within an elevated position with significant changes in levels. The proposal includes several windows on the upper floors within the north elevation serving habitable rooms which directly overlook the existing residential property and their existing windows within the south elevation. Policy DM12 of the CS seeks to ensure that the separation distances between dwellings are at least 12m between a facing and blank elevation and 21m between two facing elevations. As there are directly facing habitable windows within the proposed and existing dwellings, a distance of 21m would be required which is currently not achieved by this development. Emerging Policy H6PU requires new housing development to protect neighbouring amenity through distance or good design, and to ensure the development is not overbearing due to scale, height and/or proximity. Given the proposed siting of the dwelling and the number of





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overlooking windows the development is considered to have a detrimental impact on existing residential amenity through overlooking and loss of privacy. The detrimental impact on amenity is considered to be exacerbated by the elevated position of the proposed dwelling, the significant change in levels, and the scale of the proposal.

The development is also considered to have a detrimental impact on the existing residential amenity of Stoneycroft, due to the proposed shared use of the existing access to this property. As the applicant is the current owner of Stoneycroft, no objections have been received from this existing property. The proposal however is considered to introduce movements of additional vehicles in close proximity of Stoneycroft. Whilst the movements associated with this development would be limited, it is considered that the movements would cause disturbance to the existing residential property, particularly as several windows are located within the front/western elevation of the existing property directly overlooking the driveway, and the south elevation facing directly over the application site and proposed parking area. It is therefore considered that the proximity of the access to this existing residential property would result in a significant and unacceptable increase in noise and disturbance, which would cause significant harm and would have a detrimental effect on the living conditions for existing and future occupants of this dwelling.

On this basis, the proposal is considered to be contrary to Policies SS1 and DM10 of the Copeland Local Plan, Policy DS6PU of the Emerging Local Plan, and the provisions of the NPPF.

#### Settlement Character, Landscape Impact and Visual Impact

Policy ENV5 of the CS states that the Borough's landscapes will be protected and enhanced by: protecting all landscapes from inappropriate change by ensuring that the development does not threaten or detract from the distinctive characteristics of that particular area; that where the benefits of the development outweigh the potential harm, ensuring that the impact of the development on the landscape is minimised through adequate mitigation, preferably on-site; and, supporting proposals which enhance the value of the Borough's landscapes.

Policy DM26 of the Copeland Local Plan stated that where necessary development proposals will be required to include landscaping schemes that retain existing landscape features, reinforce local landscape character, and mitigate against any adverse visual impact. Care should be taken that landscaping schemes do not include invasive non-native species.

Within the ELP, Policy N6PU states that the Borough's landscapes will be protected and enhanced by supporting proposal which enhance the value of the Boroughs landscapes, protecting all landscapes from inappropriate change by ensuring that development conserves and enhances the distinctive characteristics of that particular area in a manner commensurate with their statutory status and value. It is stated that proposals will be assessed according to whether the proposed structures and associated landscaping relates well in terms of visual impact, scale, character, amenity value and local distinctiveness and the cumulative impact of developments will be taken into account as part of this assessment and that consideration must be given to the Council's Landscape Character Assessment,

Settlement Landscape Character Assessment and the Cumbria Landscape Character Guidance and Toolkit at the earliest stage.

Paragraph 180 of the NPPF requires that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and recognising the intrinsic character and beauty of the countryside.

The Cumbria Landscape Character Guidance and Toolkit (CLCGT) identifies the site as being within Sub Type 4 'Coastal Sandstone'. The Key Characteristics of the land comprise: coastal sandstone cliffs, sandstone rolling hills and plateaus, large open fields, prominent hedge banks bound pastoral fields, small woodland blocks along valley sides, and exposed coastal edge moving to intimate and enclosed farmland inland.

The Guidelines for development include: strengthen definition between town and country by using extensive buffer planting to screen the built up areas and reduce the impact of industry, improve visual containment of caravan parks close to the coast with landscape works and discourage further large scale developments, such as wind energy, in prominent coastal locations, conserve and enhance the traditional farm buildings and features within their own setting, and reduce the impact of any new buildings by careful siting and design.

Whilst the application site is located to the south of the existing residential property, Stonecroft, and could be considered as an extension of the current ribbon development along Seamill Lane, the scale of the proposal along with the elevated position ensures the development would be a prominent feature within the landscape. Although the development is designed to be sited within the existing landform with a significant amount of land removed to accommodate the proposal, the dwelling would sit considerably higher than the directly adjacent properties. It is also considered that the development has not been designed to limit the impacts on the surrounding area, with the property being three storeys in height with the bulk of the development within the front of the application site. On balance, the proposed development is likely to create some harm to the character of the surrounding landscape, creating a prominent feature within this rural context.

An existing Public Right of Way, which also forms part of the King Charles III England Coast Path, runs through the western section of the land with the route remaining unaltered by the proposal. However, the proposed dwelling will be located within extremely close proximity to the existing PROW. Whilst the Design and Access Statement submitted in support of the application makes reference to the design of the proposed dwelling it fails to address the impact of the development on the existing PROW. Given the scale, form, and proximity of the proposal to the PROW it is considered that the development will have a significant detrimental impact on the amenity of the users of the footpath and would result in a significant change in the character of the land within which the footpath is set.

The proposal is therefore considered to be contrary to policies ST1, ENV5 and DM26 of the Copeland Local Plan, Policy N6PU of the Emerging Local Plan, and the provisions of the NPPF which seeks to protect the countryside from sporadic non-essential development.



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### Access, Parking and Highway Safety

Policy T1 of the Core Strategy requires mitigation measures to be secured to address the impact of major housing schemes on the Boroughs transportation system. Policy DM22 of the Copeland Local Plan requires developments to be accessible to all users and to meet adopted car parking standards, which reflect the needs of the Borough in its rural context.

Policies CO4PU, CO5PU and CO7PU of the ELP promotes active travel.

Access to the property would be via the existing driveway serving Stonecroft. The existing driveway will continue to serve both properties and will be retained in its existing location along the west of the site. Both the existing and proposed property will then be served by two external parking spaces. Whilst the impact of the use of this existing access on residential amenity has been considered above, concerns have also been raised by local residential with regard to the impact of the development on highway safety given the nature of Seamill Lane. The Highway Authority have however offered no objections to this development. Although no conditions have been requested by the Highway Authority, it is considered that a construction traffic management plan could be secured by a planning condition to address resident concerns.

The existing Public Right of Way 423012 is located within the west of the application site, which also forms part of the King Charles III England Coast Path. The Council's Countryside Access Officer has therefore been consulted on this application. The Officer has confirmed that whilst consideration has been given to protecting the developments privacy from the public footpath, the application provides no detail on measures to protect the path during and after construction. Concerns have also been raised from residents and the Parish Council in relation to the impact on the footpaths. These matters could be suitably addressed by planning conditions,

It is therefore considered that the proposal will not have a detrimental impact on highway safety in accordance with Policies T1 and DM22 of the Copeland Local Plan, Policies CO4PU, CO5PU and CO7PU of the Emerging Local Plan and provisions of the NPPF.

### Drainage and Flood Risk

Policy ST1 of the Copeland Local Plan and paragraph 165 of the NPPF seek to focus development on sites that are at least risk of flooding and where development in flood risk is unavoidable, ensure that the risk is minimised or mitigated through appropriate design for the lifetime of the development.

Policy ENV1 and DM24 of the Copeland Local Plan, and Policy DS8PU of the Emerging Local Plan state that development will not be permitted where: there is an unacceptable risk of flooding and or, the development would increase the risk of flooding elsewhere.

Policy DM11 of the Copeland Local Plan and Policy DS9PU of the Emerging Local Plan requires that surface water is managed in accordance with the national drainage hierarchy and includes Sustainable Drainage Systems where appropriate.

The application site is located within Flood Zone 1. The proposed comprises a more vulnerable use and is therefore a compatible use in Flood Zone 1. As the application is for a single dwelling a Flood Risk Assessment has not be submitted to support this application.

The application states that foul water from the new build will drain into the existing main sewer located within the existing highway to the north of the application site. It is also proposed that the surface water from the development will also drain into the existing sewer via an attenuation tank with hydro brake.

The LLFA have offered no objections to the application, however, they have recommended that consideration be given to securing sufficient drainage around the rear boundary of the development to prevent surface water running off the land and effecting the property. UU have also been consulted on this application and have confirmed that the proposed drainage scheme for the development is not acceptable as they would expect the surface water to discharge directly to the nearby watercourse and not the public sewer. UU have therefore requested the inclusion of a condition to secure a sustainable surface water and foul water drainage scheme for the development.

It is therefore considered that based on the inclusion of the requested conditions, the proposal would not have a detrimental impact on flood risk in accordance with Policies ST1, ENV1 and DM24 of the Copeland Local Plan, Policies DS8PU and DS9PU of the Emerging Local Plan, and the provisions of the NPPF.

#### Ecology

Policies ST1, ENV3, and DM25 seeks to ensure that new development will protect and enhance biodiversity and geodiversity.

Policy N1PU of the Emerging Local Plan LP defines a mitigation hierarchy.

Policy N3PU of the Emerging Local Plan requires that all development, with the exception of that listed in the Environment Act must provide a minimum of 10% biodiversity net gain over and above existing site levels, following the application of the mitigation hierarchy set out in Policy N1PU above. This is in addition to any compensatory habitat provided under Policy N1PU. It is stated net gain should be delivered on site where possible and where on-site provision is not appropriate, provision must be made elsewhere in accordance with a defined order of preference.

The application site is identified as a potential area for the Small Blue, therefore the application is supported by a Preliminary Ecological Appraisal. This report concludes:

- The scrub has a very low species diversity and ecological value. It is not indicative of the plant species found in the nearby SSSI.
- There is no evidence of Japanese knotweed, giant hogweed or Himalayan balsam on



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the site.

- Badger setts do not occur on site and a lack of feeding signs or runs across the site would suggest that they do not occur within 30m of site boundaries. The proposed development will not impact on any existing badger runs or setts. The porosity of the surrounding fields to the passage of badgers will not be affected.
- The foraging habitat at the site is very poor for bat species being open and exposed. The scrub offers negligible foraging opportunities for bats. There are no hedge or tree lines connecting to the site.
- It is not considered there would be significant degradation of foraging habitat as a result of the proposal so long as the adjacent scrub and grassland is retained, bat species are highly unlikely to rely on the site for feeding but may occur in the local area and roosting by bats will not occur on the site.
- Potential nest sites were located within the core development area but the surveys were undertaken at a time of year when nesting had been completed. The habitat on site is not considered to be of anything more than of local significance, habitats present are well represented in the local area. The impact on nesting birds is therefore considered likely to be minor.
- The significance of the site to invertebrates is likely to be limited in the local context although the habitat on site will support invertebrate species.
- Slow worm and Common Lizard will undoubtedly occur in the local area but they are unlikely to be using the site in significant numbers; the surrounding dense scrub is unsuitable for these species. The dense scrub would not provide suitable basking sites. As a consequence, precautionary mitigation would be appropriate in respect of construction activities so as to ensure reasonable avoidance measures are taken to avoid the killing or injury of these species.
- There are no statutory or non-statutory sites which are connected to the site such that site development would directly affect the dispersal of species between them or directly impact upon their integrity.

The appraisal recommends the following mitigation measures:

- The landscaping scheme should utilise plants which are native and wildlife friendly.
- Works to take place in daylight hours, with escape routes provided for animals in trenches and areas of excavation and checked for animals if left open overnight.
- New roosting provision for crevice dwelling bats could be incorporated into the buildings on site.
- Any vegetation to be trimmed or cleared should be checked for nesting birds before it is removed. Ideally this should occur outside the bird nesting period March-

September. If vegetation clearance is to occur in the March-September period a check for nesting birds should be conducted first by a suitably qualified individual.

- If nesting birds are found at the site all site works shall cease and further ecological advice shall be sought with a view to a detailed method statement and programme of mitigation measures being prepared and implemented.
- Dense scrub and grassland on the edge of the development site should be retained such that it is in proximity to open areas of ground which will also be suitable for basking.

It is considered that appropriately worded planning conditions could be attached to any permission to ensure the development is carried out in accordance with the ecological appraisal and identified mitigation measures.

Natural England have offered no objections to this application, however they have requested the inclusion of conditions to secure a Construction Environmental Management Plan due to the proximity to the SSSI, a dust management plan, and a pre-construction work checks of the development site to ensure breeding birds are not present on site.

On this basis, it is considered that the development would be in accordance with the aims and objectives of both the adopted Copeland Local Plan, Emerging Local Plan and the NPPF.

#### Ground Conditions

Policy DM11 of the Copeland Local Plan states that development should not result in the unnecessary sterilisation of surface mineral resources, and wherever appropriate should incorporate remediation measures to ensure that the development is not at risk from ground instability arising from mining legacy or other former uses.

Policy DS6PU and Policy DS10PU of the Emerging Local Plan includes provisions requiring that development addresses land contamination and land stability issues with appropriate remediation measures.

Paragraph 189 of the NPPF states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination, with adequate site investigation information prepared by competent person available to inform these assessments. Paragraph 190 of the NPPF also confirms that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

As the proposed dwelling will be constructed into the existing sloping landform, a significant area of existing land will be required to accommodate the new build, with construction of retaining walls necessary. No information has been provided in relation to the level of engineer works that would be required as part of the site development, the implications of these works, and/or how this would be managed should the proposal proceed. It is therefore



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considered that insufficient information has been provided by the applicant to ensure the proposal would secure a safe development in line with provisions of the NPPF.

The proposal is therefore considered to be contrary to policies DM11 of the Copeland Local Plan, Policy DS6PU and DS10PU of the Emerging Local Plan, and the provisions of the NPPF which seeks to protect the countryside from sporadic non-essential development.

### Planning Balance and Conclusions

Paragraph 11 of the NPPF requires any adverse impacts to be weighed against the benefits that a scheme would produce.

The provision of this single dwelling would only make a very small contribution to the supply and delivery of housing within the Borough. Although there would be some economic benefits this would be limited to the construction phase which would only be apparent on a temporary basis. Consequently, little weight can be attached to this benefit.

Social benefits would be limited as the applicant has failed to provide any evidence that the proposed housing is required to meet a defined need.

Paragraph 11 of the NPPF requires the application of the presumption in favour of sustainable development to the provision of housing where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date. Out of date includes where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in Paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

In February 2023, Copeland Borough Council produced a Five-Year Housing Land Supply Statement which demonstrates a 7.1 year supply of deliverable housing sites against the emerging housing requirement and a 191 year supply against the Government's standard methodology figure. Copeland Borough Council has also met the most recent Housing Delivery Test.

The ELP will, once adopted, replace the policies of the adopted CS. The ELP has been drafted based upon an evidence base of documents which includes an updated Strategic Housing Market Assessment 2023 (SHMA). The SHMA calculates housing need in Copeland over the plan period 2017-2035 of 146 dwellings per annum. The ELP identifies that to meet the housing need identified in the SHMA, development will be required beyond the existing development boundaries and allocations identified in the CS and includes development boundaries and allocations sites for residential development that will permit delivery of the identified housing need in accordance with the sustainable development strategy proposed.

On this basis, the policies in the CS in relation to housing delivery must be considered out of date and only limited weight be given their content as far as they are consistent with the provisions of the NPPF.

Given the advanced stage of preparation of the ELP full weight can be attached to policies where no objections have been received or objections have been resolved. As the consultation on the main modifications to the ELP is now complete significant weight can also be afforded to the policies of the ELP where modifications are proposed.

The application site is located beyond the defined settlement boundary for St Bees as identified within both the CS and ELP, and is not allocated for housing development in the CS or ELP. The development comprises a market led new build house and does not therefore comprise an exception site for affordable housing, an essential dwelling for a rural worker or the conversion of a rural building. The application site is not physically connected to the settlement by safe pedestrian routes and is not considered to represent development of brownfield land. This is given significant weight.

The proposed development by virtue of its elevated location, scale, and developed form does not respond positively to the character of the surrounding area and will result in adverse impacts upon the local landscape character by creating a prominent feature within this rural context. The proximity of the proposal to the adjacent PROW, along with the proposed scale and form of the development will have a significant detrimental impact on the amenity of the users of the footpath and would result in a significant change in the character of the land within which the footpath is set. This is given significant weight.

The proposed development is also considered to have a detrimental impact on existing residential amenity, due to the proposed scale and siting, elevated position, and potential for overlooking. Furthermore, the shared use of the existing access serving Stoneycroft, would result in an unreasonable loss of residential amenity for the existing and future occupants of the existing dwelling due to the proximity of the access to the dwelling and the detrimental impacts of the associated movements and disturbance this development would create. This is given significant weight.

The proposed development will result in significant changes to existing land levels, and removal of ground materials to accommodate the dwelling, without sufficient consideration as to whether the works would affect the stability of the site or if the works ensure a safe development. This is given moderate weight.

Based on the advice from relevant consultees it is considered conditions could be placed on any decision notice to ensure the development does not have an adverse impact on existing highway conditions, the route of the adjacent PROW, ecology, and a full drainage scheme can be secured. This is given moderate weight.

In overall terms, it is considered that the direct conflicts with the provisions of the Copeland Local Plan and Emerging Local Plan, the adverse impacts on existing residential amenity, and the adverse local landscape character and visual impacts of the development, are sufficiently harmful to significantly and demonstrably outweigh the potential benefits of the development.





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8.	<b>Recommendation:</b> Refuse
9.	<b>Reasons for Refusal</b> <ol style="list-style-type: none"><li>1. The proposed development comprises a market led residential development located on a site outside of the settlement boundary of St Bees in direct conflict with the provisions of Policy ST2 of the Copeland Local Plan, DS3PU, Policy DS4PU and Policy H4PU of the emerging Copeland Local Plan 2017- 2038 and provisions of the NPPF.</li><li>2. Due to the siting of the proposed development, it is likely to create adverse impacts on the amenity of the occupiers of the adjacent property Stoneycroft through overlooking. The proposed development would also result in an intensification of the existing residential access serving Stoneycroft which would result in an unreasonable loss of residential amenity for the existing and future occupants of the existing dwelling due to the proximity of the access to the dwelling and the detrimental impacts of the associated movements and disturbance this development would create. Consequently, this proposal would be in conflict with Policies SS1 and DM10 of the Copeland Local Plan, Policy DS6PU of the Emerging Local Plan, and the provisions of the NPPF.</li><li>3. The proposed development by virtue of its elevated location, scale and developed form does not respond positively to the surrounding area and will result in adverse impacts upon the local landscape character by creating a prominent feature within this rural context. The proximity of the proposal to the adjacent Public Right of Way, which also forms part of the King Charles III England Coast Path, along with the proposed scale and form of the development will have a significant detrimental impact on the amenity of the users of the footpath and would result in a significant change in the character of the land within which the footpath is set. Consequently the proposal would be in conflict with the provisions of Policy ENV5, Policy DM26 and Policy DM10 of the Copeland Local Plan 2013- 2028 and Policy H6PU and Policy N6PU of the emerging Copeland Local Plan 2017-2038.</li></ol> <b>Statement</b> <p>The Local Planning Authority has acted positively and proactively in accordance with Copeland Local Plan policies and the National Planning Policy Framework in determining this application by identifying matters of concern with the proposal and raising those with the applicant. However, in this case it has not been possible to arrive at a satisfactory resolution for the reasons set out in the reason for refusal.</p>

<b>Case Officer:</b> C. Burns	<b>Date :</b> 26.04.2024
<b>Authorising Officer:</b> N.J. Hayhurst	<b>Date :</b> 29.04.2024
<b>Dedicated responses to:-</b> Parish Council	