

# **Strategic Planning Response to Planning Application: 4/24/2044/0F1 - LAND AT EAST ROAD, EAST ROAD, EGREMONT**

## **Copeland Local Plan 2021-2038**

### **Development of the Emerging Local Plan**

The Council is in the final stages of adopting the new Local Plan which replaces the Core Strategy. This will cover the period 2021-2038.

In February 2024, the Inspector's Consultation on Modifications was begun.

### **Weight of Emerging Policies**

The weight emerging policies can be given is determined by:

- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);
- the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The Local Plan is at an extremely advanced stage and all policies are considered by the Council to be consistent with the NPPF. The Planning Inspectorate considers all matters within the Local Plan to be sound, justified, and effective; with the exceptions of the modifications themselves which carry slightly less weight. However, as all these modifications have been agreed with the Planning Inspectorate before the consultation the weight that can be provided is still substantive.

DS3 Settlement Hierarchy	<p><i>The proposal is in the Key Service Centre of Egremont.</i></p> <p><i>Key Service Centres ought to be self-sufficient through the provision of a wide range of services and should provide service access for nearby villages.</i></p>
DS4 Settlement Boundaries	<p><i>The proposal is within the settlement boundary of Egremont.</i></p>
DS5 Planning Obligations	<p><i>The Council may seek contributions towards infrastructure that is necessary to make the development sustainable.</i></p>
DS6 Design and Development Standards	<p><i>The NPPF recognises the importance of well designed and beautiful spaces.</i></p> <p><i>The Council would question whether sufficient considerations has been given to</i></p>
E6 Opportunity Sites	<p><i>The proposal is situated within an identified opportunity site within Egremont.</i></p> <p><i>The Local Plan recognises site (OEG03) as an important opportunity to regenerate Egremont.</i></p>
R4 The Key Service Centres	<p><i>The proposal has a partial resonance with R4.</i></p> <p><i>The proposal would contribute to alleviating an outlined challenge which is a high proportion of derelict buildings; as the established petrol station.</i></p> <p><i>Aldi is a recognised national brand which would improve the range of convenience shopping options in Egremont</i></p> <p><i>It also provides a regeneration to brownfield land parcel within Egremont</i></p> <p><i>However, the site is outside of the Town Centre boundary of Egremont and separated from the town centre by the A595 with only subway crossings for pedestrians.</i></p>
R7 Sequential Test	<p><i>The proposal is for a main town centre use, but the site itself is not within the town centre, unlike another Opportunity Site (OEG01).</i></p> <p><i>The applicant has provided a sequential test which discounts several preferable sites within town centre boundaries in Egremont and Cleator Moor.</i></p>
R8 Retail and Leisure Impact Assessment	<p><i>The proposal is supported by a Retail and Leisure Impact Assessment. This is required as</i></p>

	<p><i>the site is outside the town centre of Egremont and within 800m of the town centre boundary.</i></p> <p><i>The PPG states: “in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.”</i></p> <p><i>The Council would highlight that Egremont has a substantially higher vacancy rate than the national average, and the Retail Assessment which underpins the emerging Local Plan found that there is no established need for a convenience store development. This is outlined in table 5.4 “Retail and Leisure Study, updated 2021” .</i></p> <p><i>The combination of these elements entail that Planning Policy would recommend that a third-party provides a comparative retail impact assessment, with a scope that also sought to provide further clarification regarding retail need within Egremont.</i></p>
N13	<p><i>The BNG assessment outlines the intention to plant non-native trees.</i></p> <p><i>Policy N13 outlines the requirement to plant native species.</i></p>

*Other strategic considerations:*

Strategic Objective:

“Town Centre Improvements

Enhance the vitality, viability and resilience of town centres and Local Service Centres, recognising their distinctive and unique characters, by improving the housing, retail, leisure and cultural offer for visitors and residents and by ensuring they are adaptable to change.”

“High Quality

Design Support development that meets the highest possible standards in terms of sustainable design and construction, energy efficiency, provision for biodiversity, safety, security and accessibility. Support development that relates well to the existing built environment, enhances the public realm, protects amenity and creates quality places.”

## **Copeland Core Strategy and Development Management Policies 2013-2028**

The Core Strategy was adopted in 2013 and remains an important consideration for determining planning applications. The policies most relevant to the application are the following:

ST1 Strategic Development Principles	<p><i>The proposal facilitates investment into Egremont, which is supported by A) ii</i></p> <p><i>The potential for improving the consumer offer is also supported by A) iv</i></p>
ST2 Spatial Development Strategy	<p><i>The proposal is of an appropriate scale for Egremont and will contribute towards regeneration.</i></p> <p><i>However, it is important to validate through a 3<sup>rd</sup> part assessment whether the application will support or hinder regeneration efforts within the town centre itself.</i></p>
ST3 Strategic Development Priorities	<p><i>Criterion C) outlines the strategic importance of town centre renewal in Egremont.</i></p> <p><i>As discussed throughout it is necessary to ensure that the proposal contributes, rather than undermines, this strategic goal.</i></p>
ER7 Principal Town Centre, Key Service Centres, Local Centres and other service areas: Roles and Functions	<p><i>Criterion C) outlines the aim to protect and where possible enhance services and facilities in Egremont – see above.</i></p> <p><i>Criterion D) outlines the need to ensure that shops and services meet the needs of local communities – see response to R8</i></p>
ER9 The Key Service Centres, Local Centres and other smaller centres	<p><i>The proposal represents an opportunity to improve the vitality and viability of Egremont; however, as discussed throughout the proposal is not within the town centre.</i></p> <p><i>As such, it is important to ensure that the vitality of the town centre of Egremont is not undermined.</i></p>

### *Discussion*

Strategic Planning wish to raise two critical points regarding this application.

- 1) Strategic Planning are concerned that this proposal is not supported by an evidenced need. The Council's retail study, which supported the new Copeland Local Plan 2021-2038, outlined no need for further convenience retail within Egremont.
- 2) Strategic Planning would wish to see a more robust analysis of the potential impact of the proposal on extant town centre uses. Egremont has a substantive vacancy rate within its town centre, which contributes to a loss of potential regeneration opportunities. It is essential that any approved proposals work to ameliorate rather than aggravate, this tendency.

The combination of these two issues – an unidentified need for further convenience floorspace in Egremont, and therefore a potential for excessive market saturation and a subsequent diminishing of vitality in the town centre – entails that strategic planning is unable to endorse the proposal as it currently stands.

It is important to highlight that this proposal has many positive points, and does potentially align with the strategic aims of the Council. However, it is important that further clarification regarding the issues above is provided.