



# Planning, Design and Access Statement

Car Park Extension and Memorial Garden, Griffin Park

**Civil Nuclear Constabulary**

**April 2025**

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**Report title:** Planning, Design and Access Statement

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**Status:** FINAL

**Draft date:** 3 April 2025

**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 This Planning, Design and Access Statement has been prepared by Avison Young on behalf of Civil Nuclear Constabulary ('CNC') ('the Applicant') to assist Cumberland Council ('the Council') in its consideration of the accompanying full planning application relating to the extension of the existing car park at the Civil Nuclear Constabulary Training Facility, Griffin Park, Seascale, and the erection of a memorial garden to the north of the extended car park.
- 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

- Application Forms (Avison Young);
- Planning, Design and Access Statement;
- Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment Report (DWS); and
- Transport Statement.

- 1.4 Drawings and Plans

- AY-CNC-001 Location Plan;
- JN2826-Dwg-0001C Existing Car Park Layout Plan;
- JN2826-Dwg-0006B Proposed Car Park Layout Plan;
- AY-CNC-007 Memorial Garden Layout Plan; and
- AY CNC-009 Memorial Garden Proposed Elevations.

## Statement Structure

- 1.5 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 'Planning Policy Context' – provides an overview of local and national planning policy that has informed the proposals.

- Chapter 5 'Design and Access' – provides an explanation of the principles behind the choice of development zones and how these provide the need for appropriate access and will inform the detailed layout of the proposal.
- 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 Surroundings

### Application Site and Context

- 2.1 The Civil Nuclear Constabulary Tactical Training Facility is located at Griffin Park, Seascale, CA20 1DW. The training centre opened in 2021 and represents a state-of-the-art facility operated by CNC, a specialist armed police force afforded the responsibility of the protection of civil nuclear sites and nuclear materials across England and Scotland.
- 2.2 CNC employ over 1,600 police officers and supporting staff at nuclear sites across the UK. The organisation is responsible for the armed protection of civil nuclear facilities and materials whether they are on site or in transit. Griffin Park has provided a significant contribution to the ongoing role of CNC by providing a state-of-the-art training centre which includes indoor live firearms training facilities. Those working within the CNC organisation regularly travel across the country to use the facilities available at Griffin Park.
- 2.3 The application boundary comprises a total area of 7,287 square meters (0.73 hectares). The application area includes the existing staff car park; and an area of maintained grassland to the north east of the existing car park.
- 2.4 The application boundary is approximately 250m north of the Sellafield nuclear site, operated by Sellafield Limited on behalf of the Nuclear Decommissioning Authority (NDA). The nuclear site closed in 2003 having operated since 1950. Decommissioning of the Site commenced in 2005 and the NDA expect full remediation of the site to be completed by approximately 2125.
- 2.5 The Site boundaries comprise of the following land uses:
- To the north, an area of grassland, with trees and the River Calder beyond;
  - To the West, the Griffin Park training facility;
  - To the east, an area of grassland; and
  - To the south, an additional car park and a small service road that connects the training facilities with a public highway.

### Technical Considerations

- 2.6 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.

- 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. The River Calder is located approximately 40m north of the application boundary at the closest point, therefore small parts of the area of grassland to the north of the Site boundary are in Flood Zones 2 and 3.
- There are no statutory or non-statutory ecologically designated sites within the site boundary, however the Low Church Moss Site of Special Scientific Interest (SSSI) is located within 2km of the Site. Calder Bank Wood, located approximately 200m north east of the Site, is designated as Ancient Woodland.
- 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.

## Planning History

- 2.7 Avison Young have reviewed the Cumberland Council Planning Application Public Access website to confirm whether any previous planning applications that have been submitted at the Site. Previous planning applications which may hold relevance to the submission of this application have been summarised in *Table 1*:

Application Reference	Location	Description of Development	Decision
4/24/2368/0F1	Griffin Park Tactical Training Facility, Seascale	Application to Determine if Prior Approval is Required for Solar PV Installation on the Roof Area	Application awaiting determination
4/23/2290/0F1	Civil Nuclear Constabulary Training Facility, Sellafield, Seascale	Change of Use of Land from Landscaped Area to Memorial Garden	Approved 8 December 2023

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4/23/2022/0F1	Land to the South East of Civil Nuclear Constabulary Training Facility, Seascale	Change of Use of Land From Landscaped Area to Dog Training Facility	Approved 14 April 2023
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4/15/2251/0F1	Land to the South East of Sellafield Complex, Sellafield, Seascale	Construction of an Indoor and Outdoor Training Facility Comprising Three Indoor Ranges, Advanced Skills and Hub Buildings, Outdoor Training Area, Landscaping, Security Fencing, Car Parking Areas, Associated Plant and Infrastructure and Vehicular and Pedestrian Access	Approved 14 April 2023
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### 3. Development Proposals

3.1 Full planning permission is sought for the following development proposal:

*“Extension and Reconfiguration of Existing Car Park, Erection of Memorial Garden, and associated landscaping improvements.”*

3.2 In summary, the development comprises the following:

- Reconfiguration of the existing car park area to include an additional 9 car parking spaces by extending the existing rows;
- Extension of the car park to the north to include an additional 27 spaces (20 perpendicular parking bays and 7 parallel bays) operating in a one-way system; and
- Erection of a small memorial garden to the north of the extended car park.

3.3 Further details regarding the development proposals (including details of scale, layout, appearance, and massing) are set out in the accompanying Design and Access Statement (Chapter 5 of this Statement), however the proposals can be largely summarised as below.

#### Reconfiguration and Extension of Car Park

##### Existing provision

3.4 The Griffin Park training facility was granted planning permission in March 2016 for the following development (ref: 4/15/2251/0F1):

*“Construction of an Indoor and Outdoor Training Facility Comprising Three Indoor Ranges, Advanced Skills and Hub Buildings, Outdoor Training Area, Landscaping, Security Fencing, Car Parking Areas, Associated Plant and Infrastructure and Vehicular and Pedestrian Access.”*

3.5 The existing training facility includes the following parking provision:

- 103 car parking spaces (101 general car parking spaces and 2 allocated spaces for Autonomous Police Vehicles (APVs);
- 10 motorcycle parking bays; and
- Secure cycle parking for a total for 20 bicycles.

- 3.6 Vehicular access to the site is from the unnamed road between Calder Bridge and Sellafield. A priority-controlled T-junction provides the access to both Griffin Park and the CNC dog training facility. Access to the main entrance and car park (Access A) for the Griffin Park Training facility is along this main access road via a security barrier. The delivery service road (Access B) is accessed via a priority-controlled junction to the south-west of the main access. This access is also controlled by a security barrier. The priority-controlled access provides a wide entry width with a central island to allow U-turns at the security barriers.
- 3.7 The existing car park is utilised by CNC staff and visitors who require access to the Griffin Park training facility.
- 3.8 CNC require additional parking provision across the Site. The car park is currently over capacity on most weekdays with overspill vehicles parking in disabled bays; at the end of parking bays; along verges; on both sides of the access road on the approach to Griffin Park; and within a small service area located to the north of the main training facility building.
- 3.9 To ascertain the current parking demand at Griffin Park, a cumulative parking survey was undertaken at the Site in July 2024 by *SAJ Transport Consultants*. The methodology and results of the survey are contained in the submitted *Transport Statement*, however a summary is provided below:
- The car park is over capacity for most of the day from 07:30-10:40.
  - Maximum parking accumulation was 140 vehicles (138 cars/LGVs and 2 pedal cycles).
  - Peak parking demand was experienced at 10:35-10:40.
  - No motorcycles accessed the Site.
- 3.10 In terms of refuse management, the existing refuse collection point is located to the rear of the main training facility building, see *Figure 1*. This is currently accessed by vehicle via the service access route (Access B) through the security barriers.

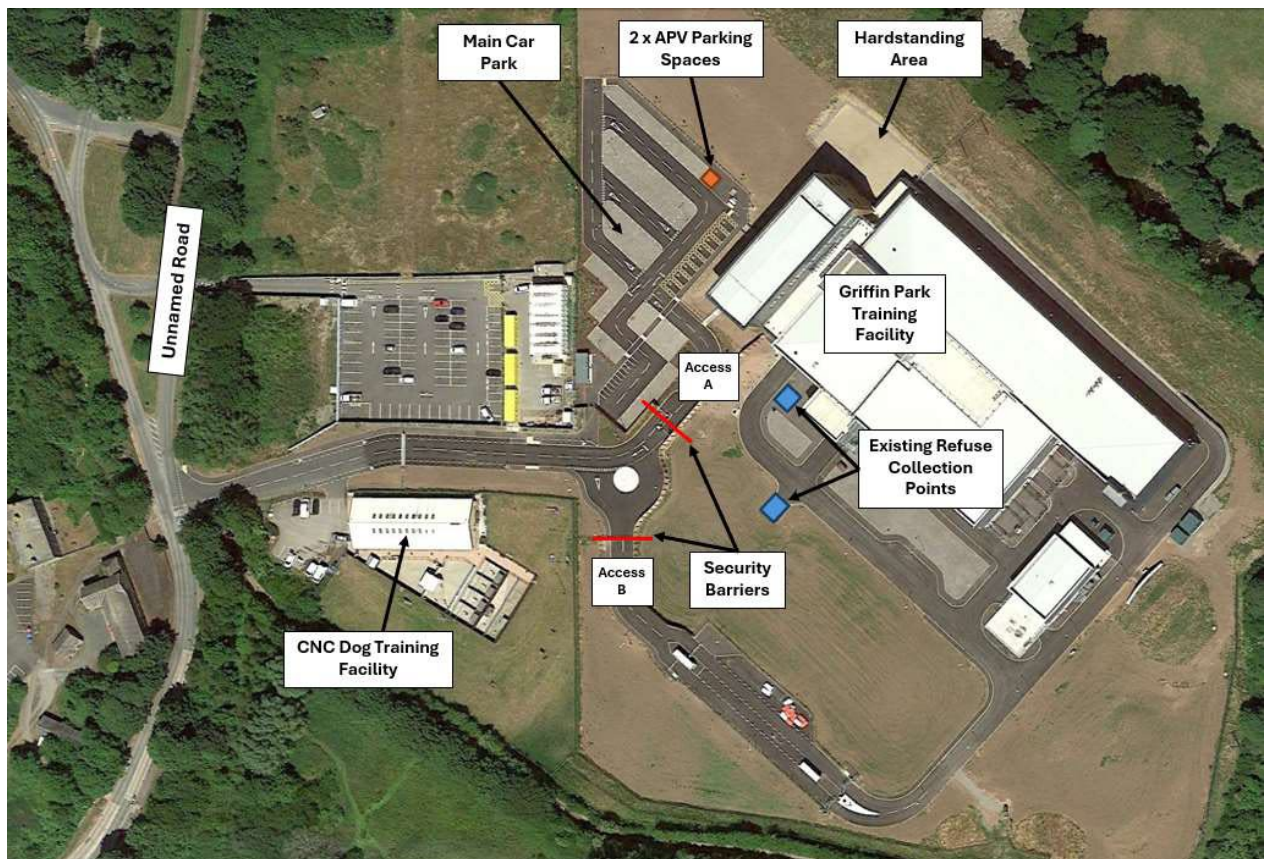


Figure 1: Existing Site Layout

#### Proposed provision

3.11 This application proposes to increase the volume of parking spaces at Griffin Park training facility from 103 spaces to 142 spaces – an increase of 39. This increased schedule will be achieved through the following methods:

- Reconfiguring the existing car park area to include an additional 9 spaces by extending the rows;
- Extending the car park to the north to include an additional 27 spaces (20 perpendicular bays and 7 parallel, operating in a one-way system; and
- Providing 3 Electric Vehicle (EV) Parking Spaces in the existing hardstanding service area to the north of the main building, which will provide for an existing requirement from current car park uses.

3.12 The existing hardstanding area to the north of the main building is currently utilised by police vehicles and accessed via the rear of the building. It is proposed to connect this area to the main car park by extending a two-way access road to the hardstanding area from the car park to provide access from

the front of the building. This will be beneficial to allow access to the APV parking area during external training exercises which prevent access via the service delivery road.

- 3.13 The majority of the hardstanding area will remain for the use of existing APV's plus the three proposed EV parking spaces. The EV parking space dimensions are 5.0m long and 2.4m wide with 1.2m hatching between spaces to allow for accessible parking.
- 3.14 With regards to refuse management, the increase in external training requirements at the facility has created access issues for existing refuse collections which are often turned away or required to wait. This application proposes to relocate the waste storage and refuse collection point prior to the security barriers, see *Figure 1*.
- 3.15 A swept path analysis of access to the proposed refuse collection point was undertaken by *SAJ Transport Consultants* using a 12m refuse truck. The results of the swept path analysis demonstrate that there is adequate space for refuse trucks to access the refuse collection point enabling vehicles to enter and leave the Site in forward gear. Results of the swept path analysis are contained at Appendix C of the *Transport Statement*.
- 3.16 With regard to the boundary treatment to the car park, the existing arrangement comprises a low open-panel timber fence that wraps around the northern perimeter, see *Figure 2*. This application proposes to introduce a replica of the existing open-panel timber fencing to the northern boundary of the extended car park.



*Figure 2: Timber fencing surrounding car park*

## Memorial Garden

3.17 The application also proposes to introduce a 'memorial garden' to the north of the extended car park. The memorial garden will measure 15m from north to south and 11.2m east to west, located to the immediate north of the proposed car park extension.

3.18 A summary of key features of the memorial garden is as follows:

- Two feature trees in the northern section of the memorial garden;
- Garden stone walling (height to raise to 1.5m);
- Circular stone laid in paving with white CNC engraving;
- Four hardwood benches;
- 6m diameter lawn comprising modified grassland;
- Hardy perennials and shrubs;

- Raised circular bed with generous slate coping stone for informal seating raising to 400mm in height. Multi stemmed silver birch tree would be centrepiece;
- Gravel paths;
- Double entrance gates;
- Gravel entrance path edged with recessed timber board;
- Four features trees in the southern section of the garden;
- Post and wire fence (1m height);
- Beech hedge underplanted with snowdrops (clipped annually to 1.2m height); and
- Natural stone paving in assorted sizes.

3.19 The garden will comprise of native species of shrub which will include species such as: Hawthorn *Crataegus monogyna*; Blackthorn *Prunus spinosa*; Dogwood *Cornus sanguinea*; Guelder rose *Viburnum opulus*; Elder *Sambucus nigra*; Holly *Ilex aquifolium*; and Hazel *Corylus avellana*. This list of species is not exhaustive.

3.20 Planning permission was granted in December 2023 (application reference: 4/23/2290/0F1) for a memorial garden at Griffin Park training facility with the following description of development:

*"Change of Use of Land from Landscaped Area to Memorial Garden."*

3.21 The permission will not be implemented, with CNC requiring the memorial garden to be located several meters to the north to accommodate the car park extension. The revised location and details of the proposed memorial garden have been included in this planning application.

## **Landscape Improvements**

3.22 This application also proposes to introduce a total of 17 'urban trees' along the perimeter of the area of maintained grassland to the north of the existing car park. As set out above, 6 ornamental trees will be introduced within the memorial garden, bringing the total number of proposed trees to 23.

3.23 All 23 trees will be native species. The trees within the garden are due to consist of 2 crab apple *Malus 'Evereste'* and 4 *Prunus serrulata* 'Kanzan' planted atop native scrub. Trees around the north of site should consist of species such as English oak *Quercus robur*, native willow species, silver birch *Betula pendula*, native cherry species, rowan *Sorbus aucuparia*, or whitebeam *Sorbus aria*.

- 3.24 Details of the proposed individual trees are provided in the *Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment*.

## 4. Planning Policy Context

### Legislative Context

- 4.1 The Town and Country Planning Act (1990), Planning and Compulsory Purchase Act (2004) is relevant to the consideration of this application.

- 4.2 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

- 4.3 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

- 4.4 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 type is available in the right places and at the right time to support growth, innovation and improved productivity;
  - Social objective – to support strong, vibrant and healthy communities, by providing a range of homes and by fostering well-designed, beautiful and safe places, with accessible services and open spaces; and
  - Environmental objective – to protect and enhance the natural, built and historic environment, improving biodiversity, minimising waste and adapting to climate change.
- 4.5 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.
- 4.6 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 clear 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.”*

### **Building a strong, competitive economy**

- 4.7 Paragraph 88 (b) states that to support a prosperous rural economy, planning policies and decisions should enable “the development and diversification of agricultural and other land-based rural businesses.
- 4.8 Paragraph 89 stipulates “planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.” It will be important to ensure that development in these circumstances is sensitive to its surroundings, while not having an unacceptable impact on local roads. Paragraph 85 further states that “the use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

### **Promoting Sustainable Transport**

- 4.9 Paragraph 115 (c) sets out that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.
- 4.10 Paragraph 117(c) states that development should create places that are safe, secure and attractive, while minimising the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards. Paragraph 117(d) further adds that development should allow for the efficient delivery of goods and access by service and emergency vehicles. Paragraph 117(e) affirms that development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

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

- 4.11 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.”

## Achieving Well Designed Places

- 4.12 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.
- 4.13 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.*
- 4.14 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

- 4.15 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

- 4.16 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.

## Planning Practice Guidance

- 4.17 Planning Practice Guidance (PPG) complements the NPPF in terms of how the NPPF should be implemented in practice. The PPG can be a material consideration in the decision-making process. The following categories of the PPG are considered relevant in the consideration of this proposal:

- Biodiversity Net Gain;
- Design: Process & Tools;
- Determining a Planning Application;
- Effective Use of Land;
- Natural Environment; and
- Travel Plans, Transport Assessments and Statements.

## Local Plan - Adopted

- 4.18 The application site is situated in the newly founded Cumberland Council unitary authority within the Borough of Copeland. The statutory development plan for the application therefore comprises the policies of the Copeland Local Plan 2021-2039 (adopted in November 2024)
- 4.19 The following Local Plan policies have been identified as relevant in the determination of this application:
- **Policy DC4 Design and Development Standards** confirms that the Council expect all new development to meet high-quality design standards which contribute positively to the health and wellbeing of residents. To meet these standards, Policy DC4 set out a comprehensive criteria for which new development must adhere to.
  - **Strategic Policy NU1 Supporting Development of the Nuclear Sector** states that the Council will support and encourage the development of the nuclear sector including new nuclear missions within Copeland if proposals are in accordance with relevant National Policy and Government

Guidance. Proposals that deliver the Sellafield mission and the NDA's mission will be supported where they meet the criteria in Policy NU4. In applying this policy, the Council will expect the benefits of nuclear sector-related development in Copeland to outweigh the disbenefits, encouraging developers to assist with the achievement of local economic, social and environmental strategies/priorities.

- **Strategic Policy NU3 General Nuclear Energy and Associated Development and Infrastructure** sets out that the Council will support nuclear energy sector projects and associated infrastructure projects by working with potential developers to identify suitable sites for a range of nuclear related support activities including, supply chain operations, research and development, worker accommodation and other relevant uses.
- **Strategic Policy N1 Conserving and Enhancing Biodiversity and Geodiversity** affirms that the Council is committed to conserving Copeland's biodiversity and geodiversity including protected species and habitats. Potential harmful impacts of any development upon biodiversity and geodiversity must be identified and considered at the earliest stage.
- **Strategic Policy N3 Biodiversity Net Gain** states that all development with the exception of that listed in the Environment Act 2021 and any documents which may supersede it must provide at least 10% biodiversity net gain over and above existing site levels, following the application of the mitigation hierarchy set out in Policy N1.
- **Strategic Policy N6 Landscape Protection** provides a series of measures that will protect and enhance Copeland's landscapes, including *"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."*
- **Strategic Policy N9 Green Infrastructure** stipulates that the amount of green infrastructure on the development site should be maximised and developers should take opportunities to create new connections, expand networks and enhance existing green infrastructure to support the movement of plants and animals. Green infrastructure should be multi-functional where possible and should be considered at the start of the design process.
- **Policy C04 Sustainable Travel** confirms that the Council will support, in principle, developments which integrate electric vehicle charging infrastructure.
- **Policy C07 Parking Standards** sets out that proposals for new development will be required to provide adequate parking provision, including cycle parking and accessible parking bays, in accordance with the Cumbria Development Design Guide (or any document that replaces it) where appropriate.

## 5. Design and Access Statement

### Use

- 5.1 The existing uses contained within the Site boundary comprise the existing car park for the Griffin Park training facility and an area of maintained grassland to the north of the existing car park. Car parks do not fall within a designated use class under the Town and Country Planning (Use Classes) Order 1987 (as amended). The existing car park can therefore be considered a 'Sui Generis' use.
- 5.2 The application proposes to reconfigure the existing demise of the car park and extend it into the area of maintained grassland. The application also proposes to introduce a memorial garden to a section of the maintained grassland to the north of the car park. The application does not propose a change of use.

### Amount

- 5.3 It is proposed to increase the volume of parking spaces in the Griffin Park Training facility car park to 142 spaces – an increase of 39 spaces. The increase in parking levels will be achieved by: reconfiguring the existing car park area to include 9 additional car parking spaces by extending the existing rows; extending the car park to the north to include 27 additional spaces (20 perpendicular bays and 7 parallel bays) operating in a one-way system; and providing 3 Electric Vehicle (EV) Parking Spaces in the existing hardstanding area which will provide for an existing requirement from current car park users.

### Layout and Scale

- 5.4 The application proposes to extend the existing demise of the car park by 12m to the north, with the extended car park to retain its' existing shape. The application also proposes to connect the car park to an existing service area to the north of the main building.
- 5.5 The memorial garden will be located to the immediate north of the extended car park. The garden will measure 15m from north to south and 11.2m east to west. *AY-CNC-007 Memorial Garden Layout Plan* provides detailed dimensions of the layout and scale of the proposed garden in relation to the extended car park.

### Landscape and Appearance

- 5.6 At present, the Site is an area of grassland and existing car park within the Griffin Park Tactical Training Facility. The application proposes to retain areas of the existing car park and some of the modified grassland.

- 5.7 To mitigate the loss of a section of the modified grassland, the application proposes a series of landscaping features, both within the memorial garden, and elsewhere within the Site boundary. The centre of the garden will feature a lawn comprising modified grassland, used for amenity purposes, dominated by grasses and mown short. This will be similar to grassland already present on the Site. The garden will also comprise a series of native species of scrub, regularly maintained to create an aesthetic environment within the wider CNC facility.
- 5.8 The development also includes the planting of 17 small 'urban trees' along the northern boundary of the Site. Alongside the memorial garden, this will ensure that the application exceeds the statutory 10% net gain threshold. The proposed trees will introduce a soft landscape feature that will enhance the green infrastructure provision on the Site and add a visually aesthetic element to the CNC training facility.

### **Access**

- 5.9 Vehicular access to the site is from the unnamed road between Calder Bridge and Sellafield. A priority-controlled T-junction provides the access to both Griffin Park and the CNC dog training facility. Access to the main entrance and car park (Access A) for the Griffin Park training facility is along this main access road via a security barrier. The delivery service road (Access B) is accessed via a priority-controlled junction to the south-west of the main access. This access is also controlled by a security barrier. The priority-controlled access provides a wide entry width with a central island to allow U-turns at the security barriers. This application does not propose to amend access arrangements to the Site.

## 6. Assessment of the Proposals

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

- The Principle of Development
- Other Material Considerations
  - Access and Transport;
  - Ecology and landscaping; and
  - Flood Risk and Drainage;

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 adopted Development Plan comprises the Copeland Local Plan 2021-2039 (adopted November 2024). The adopted proposals map shows that the Site does not contain any specific allocation, nor does it show any statutory or non-statutory designation affecting the site which may prohibit certain types of development.

6.5 The proposed development comprises the extension of the existing staff and visitor car park for the Griffin Park CNC training facility. The Parking Survey undertaken by *SAJ Transport Consultants* to inform the supporting *Transport Statement* concluded that the existing car park is over capacity Monday to Fridays with excess vehicles parking along the access road to the facility and within disabled parking bays. The survey determined that the current parking demand at the facility equates to 138 vehicles.

6.6 Griffin Park plays an important role in facilitating the activities undertaken by CNC across the country, providing armed policing and security for civil nuclear establishments and materials throughout the UK, and maintaining a state of readiness against possible attacks on nuclear licensed sites. Ensuring that Griffin Park is accessible for a suitable quantity of staff and visitors is crucial to enabling the facility to fulfill its' purpose to CNC. Furthermore, it is important in ensuring that the facility can be accessed safely by both staff and visitors.

- 6.7 Adopted Local Plan Policy CO7 states that *"Proposals for new development will be required to provide adequate parking provision, including cycle parking and accessible parking bays, in accordance with the Cumbria Development Design Guide (or any document that replaces it) where appropriate."*
- 6.8 Ensuring that Griffin Park contains adequate parking provision is therefore compliant with Local Plan Policy CO7, supported by the Parking Survey undertaken by *SAJ Transport Consultants*.
- 6.9 Furthermore, by introducing three Electric Vehicle (EV) Charging spaces to the car park, the development is in line with Strategic Policy CO4 which affirms that *"proposals for the integration of electric vehicle charging infrastructure into new developments"* will be supported in principle.
- 6.10 The principle of developing a Memorial Garden at the training facility is also supported in policy terms. The mitigation hierarchy set out in Strategic Policy N1 has been considered while formulating the development proposals. The development is also in accordance with Strategic Policy N3 which affirms that development must provide at least 10% Biodiversity Net Gain in line with the Environment Act 2021. The preliminary *Ecological Assessment and Biodiversity Net Gain Assessment* demonstrates that the development proposals will exceed this figure.
- 6.11 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

- 6.12 *SAJ Transport Consultants* have prepared a Transport Statement in support of this application, assessing the transport-related impacts associated with the extension of the existing car park, and relocation of refuse storage facilities at Griffin Park. The key findings of the report are summarised below.
- 6.13 The car park is currently over capacity Monday to Fridays with excess vehicles parking along the access road to the facility and within disabled parking bays. A cumulative parking survey was undertaken at the Site in July 2024 finding that:
- The car park is over capacity for most of the day from 07:30 to 15:30;
  - Maximum parking accumulation was 140 vehicles (138 cars/LGVs and 2 pedal cycles); and
  - Peak parking demand was experienced at 10:35 to 10:40.

- 6.14 The survey demonstrated that the current parking demand at Griffin Park exceeds the current capacity during most of the day, with maximum parking demand of 138 vehicles (excluding two-wheelers).
- 6.15 The development proposes to increase the volume of parking spaces in Griffin Park to 142 – an increase of 39 spaces. This will be achieved by reconfiguring the existing car park, extending the car park to the north, and providing three new EV charging spaces within the existing hardstanding area to the north of the main building. The two existing designated Autonomous Police Vehicle spaces will also be relocated to the hardstanding area. A small access road will be provided between the extended car park and hardstanding area (currently utilised by APV vehicles).
- 6.16 The relocation of the refuse collection point outside of the security barriers will provide a more readily accessible location. The swept path analysis demonstrates that there is adequate space for refuse trucks to access the new refuse collection point.
- 6.17 Considering all the above, it is considered that the proposed car park extension, access to hardstanding area and refuse collection point relocation are acceptable and should be supported from a highways and transportation perspective. The development complies with Local Plan policies CO4 and CO7 and Chapter 9 of the NPPF.

## Ecology and Landscaping

- 6.18 *Durham Wildlife Services* have completed a *Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain Assessment* in support of this application. This involved a desk-based study and PEA habitat survey, and biodiversity net gain calculations in relation to development at land within the Griffin Park training facility.
- 6.19 The ecological assessment took place on 30th October 2024 in accordance with the UK Habitat Classification methodology, using the most up to date version on the UK Habitat Classification (Version 2.0). Three main habitat land categories were identified on site under the UKHab system of habitat classification. The site is a developed car park with both sealed and unsealed surface present, with modified grassland to the north.
- 6.20 The grassland on Site provides some poor opportunities for species such as birds and small mammals to forage. The site is largely unsuitable to support protected species given its location and poor habitats within the surveyed area.
- 6.21 As the works on site will be localised to the area of modified grassland, it is unlikely that impacts will occur on designated sites. The nearby designated sites do not feature similar habitats to those on site

and the grassland to be lost is unlikely to support the same species that Terrace Bank Wood and so no indirect effects are expected.

- 6.22 The Biodiversity Metric calculation found that the Site contains 0.76 habitat units, 0 hedgerow units, and 0 watercourse units. The development will result in 0.84 habitat units, 0 hedgerow units, and 0 watercourse units. This results in a 10.86% gain of biodiversity on site.
- 6.23 As set out in Section 3 of this statement, a total of 23 trees are due to be planted on Site. This includes 6 ornamental trees within the garden and 17 native species to be planted along the northern boundary of the Site. The trees within the garden are due to consist of 2 crab apple *Malus 'Evereste'* and 4 *Prunus serrulata* 'Kanzan' planted atop native scrub. Trees around the north of site should consist of species such as English oak *Quercus robur*, native willow species *Salix* sp, silver birch *Betula pendula*, native cherry species *Prunus* sp., rowan *Sorbus aucuparia*, or whitebeam *Sorbus aria*.
- 6.24 Newly planted trees have been input into the biodiversity metric as small size, unlikely to become any larger over the 30-year lifespan of the metric agreement.
- 6.25 The landscape proposals ensure that the application complies with The Environment Act 2021 Legislation on Biodiversity Net Gain. Furthermore, the application acts in accordance with Local Plan Policies N3, N6, and N9. The application has also carefully considered Chapter 15 of the NPPF.

## Flood Risk and Drainage

- 6.26 Condition 2 of the existing planning permission for the Griffin Park training facility (ref: 4/15/2251/0F1) requires the development to be carried out in accordance with the approved Flood Risk Assessment. Condition 5 requires *"all of the measures identified in the flood risk assessment, produced by WML Consulting dated August 2015, shall be implemented in full and maintained in perpetuity thereafter."*
- 6.27 The existing car park area is located within 'Area A' of the approved drainage strategy. The car park incorporates porous paving. Due to the landscaping of the Site, only porous paving that is either failing away or situated away from the embankments will be considered for infiltration. The remaining surface water is tanked, with pipe outfalls and flow controls (orifice plates) to infiltration type paving areas. Exact details of the construction materials of the extended car park have not been decided, however in accordance with the approved permission at the Site, the extended car park will comprise porous paving. The drainage strategy for the main car park will therefore remain as existing.
- 6.28 With regard to the proposed Memorial Garden, the garden will comprise significant areas of planting which will assist in managing drainage and preventing flooding and waterlogging. The Garden will

mainly incorporate porous paving, with small sections of impermeable paving across the northern section of the garden. Any surface water will run off into surrounding areas of planting and vegetation, and permeable paving. *Figure 3* shows an indicative design of the surfaces within the garden, although this design may be subject to change to ensure the development incorporates a suitable level of biodiversity.



*Figure 3: Indicative design of Memorial Garden.*

6.29 The proposed drainage strategy is in accordance with Local Plan policies DS6 and DS7.

## **Archaeology**

6.30 This statement outlines the archaeological considerations for the proposed extension of the car park and accommodation of a memorial garden in the existing area of maintained grassland to the north of the car park.

6.31 Under the original planning permission for the development of the CNC facility, a Heritage Assessment was completed by *Resource and Environmental Consultants Ltd*, dated June 2015. Chapter 4 of this statement provided an assessment on the archaeological and historical background of the Site

and an assessment of significance. This chapter reviewed archaeological evidence for the Site and the archaeological/historical background of the general area.

- 6.32 The assessment confirmed that there were no designated assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens or Registered Battlefields) within the study site boundary.
- 6.33 A Grade II\* and eight Grade II Listed Buildings are located to the north of the site. The closest Listed Building is that of Sella Park (Grade II) which is c. 100 m to the north of the site. All the Listed Buildings, with the exception of Sella Park House, are located sufficiently far away from the site so that no impact upon their settings or significance is expected as a result of development proposals at Griffin Park.
- 6.34 The existing immediate setting of Sella Park Hotel is formed by a car park and hard and soft landscaping associated with the current hotel use, within extensive gardens, enclosed by a mixture of hedges and the remains of woodland plantation. This loosely creates a sense of enclosure and separation from the surrounding agricultural and developed landscape. This immediate setting is the principal setting in which the heritage asset is experienced, the grange being largely hidden from view from its wider setting.
- 6.35 The high (national) significance of Sella Park primarily relates to the architectural and historic special interest of the fabric of the building itself as an example of a former grange building, possibly the Sea Grange of the nearby Calder Abbey (although it has been subject to later modifications and extensions). Its immediate setting within a former designed and enclosed wooded landscape alongside the River Calder makes a positive contribution to its significance. The extended setting, also positive in its contribution to the significance of the former grange, particularly in regard to the functional association with the surrounding agricultural fields, offers a secondary contribution to the assets architectural and historic special interest.
- 6.36 No archaeological assets from the prehistoric, Roman, Saxon, Medieval and Post- Medieval periods were evident within the site, with few being recorded within its surroundings. Therefore, the potential for as yet to be discovered archaeological finds and features from these periods was considered to be low/nil. The extension of the existing car park and accommodation of a memorial garden at Griffin Park will not require significant ground works. In consideration of these factors, it is considered that the site boundary does not hold archaeological value and the development should not raise concerns from an archaeological perspective. The proposed development is also unlikely to have a significant impact on known heritage assets.

## Land Contamination

- 6.37 This section addresses the potential contamination risks associated with the proposed extension of the existing car park and accommodation of a memorial garden at Griffin Park, Cumbria.
- 6.38 The application Site has remained untouched by previous development across the wider CNC site to accommodate a training facility at Griffin Park. As such, the likelihood of significant ground contamination sources being present across the area of maintained grassland is considered to be very low.
- 6.39 The proposed development does not require significant excavation of the existing area of maintained grass. The development will require the removal of the grass and shallow excavation to enable suitable layers of paving to be installed across the area.

## 7. Summary and Conclusions

- 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 Cumberland Council's adopted Development Plan and saved policies for the Copeland Borough.
- 7.3 The development proposals seeks full planning permission for the following development proposal:

*"Extension and Reconfiguration of Existing Car Park, Erection of Memorial Garden, and associated landscaping improvements."*

- 7.4 In summary, the development comprises the following:
- Reconfiguration of the existing car park area to include an additional 9 car parking spaces by extending the existing rows;
  - Extension of the car park to the north to include an additional 27 spaces (20 perpendicular parking bays and 7 parallel bays) operating in a one-way system; and
  - Erection of a small memorial garden to the north of the extended car park.
- 7.5 CNC require additional parking provision across the Site. The car park is currently over capacity on most weekdays with overspill vehicles parking in disabled bays; at the end of parking bays; along verges; on both sides of the access road on the approach to Griffin Park; and within a small service area located to the north of the main training facility building. This was confirmed by a Parking Survey undertaken by *SAJ Transport Consultants* to inform the submitted *Transport Statement*.
- 7.6 CNC also seek to introduce a memorial garden to the facility. This will create a location within the facility grounds where staff can visit, leading to a range of benefits to the physical and mental wellbeing of CNC employees.
- 7.7 Section 6 of this statement demonstrates how the application is acceptable in policy terms. The principle of extending the car park and amending the refuse arrangements is considered acceptable by Local Plan policies CO4 and CO7. The provision of a memorial garden and wider landscaping improvements to Griffin Park Local Plan policies N1 and N3. The development is also in full accordance with the NPPF.

- 7.8 Section 6 of this statement demonstrates how the application is acceptable in policy terms. The principle of extending the car park and amending the refuse arrangements is considered acceptable by Local Plan policies CO4 and CO7. The provision of a memorial garden and wider landscaping improvements to Griffin Park aligns with Local Plan policies N1 and N3. The development is also in full accordance with the NPPE.
- 7.9 In consideration of the information provided in this statement, it is respectfully requested that Cumberland Council grant planning permission for this development without delay.

# Contact details

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