

Strategic Planning Response –

**APPLICATION 4/23/2044/0F1: ERECTION OF THREE STOREY BUILDING TO FORM SHOP, WAREHOUSE, OFFICES AND ANCILLARY STORAGE ALONG WITH NEW VEHICLE ACCESS, CAR PARKING AND YARD AREAS; & ERECTION OF 2NO. SINGLE STOREY BUILDINGS TO CREATE 6NO. UNITS (USE CLASS B2/B8) AND ASSOCIATED PARKING AREAS.
LAND ADJACENT TO ST THOMAS CROSS ROUNDABOUT, EGREMONT.**

Thank you for consulting with the Strategic Planning Team. The key issues from a planning policy perspective are outlined below.

Copeland Core Strategy and Development Management Policies 2013-2028

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

Policy	Policy Team Comment
ST1 Strategic Development Principles	<i>The proposed development contributes positively to Criterion a). In particular through the increased provision of jobs it will provide to Egremont.</i>
ST2 Spatial Development Strategy	<i>The proposed development is congruent with this policy, as the scale is considered appropriate for a Key Service Centre.</i>
ER4 – Land and Premises for Economic Development	<i>The site is located on Employment Allocation E10 as identified in saved policy EMP1.</i> <i>The application provides a large amount of green infrastructure (GI) on site, and, as such, could be interpreted as being in partial conflict with criterion B). However, this GI comprises an element of existing woodland and scrub, and this and additional planting are generally located on steeper sloping land which would be harder to develop for employment uses. The GI is also provided within a wider landscaping strategy that helps to meet Biodiversity Net Gain requirements on site as well as helping to mitigate drainage and landscape and visual impacts.</i> <i>As such, the Strategic Policy team considers this to be acceptable.</i>
ER6 – Location Of Employment	<i>The proposed development is supported by Criterion A).</i>
Policy ER9 – The Key Service Centres, Local Centres, and other smaller centre	<i>While the proposal identifies a retail use, the applicant has provided evidence clarifying the ‘trade counter’ nature of any sales. As such, while outside the Town Centre boundary of Egremont, this is considered acceptable.</i>
ER11 – Developing Enterprise and Skills	<i>The proposed development positively supports the strategic aims of this policy, in particular criterion C), through the provision of several smaller commercial units.</i>
SS5 – Provision and Access to Open Space	<i>The landscape scheme outlines that the existing green infrastructure will be largely protected and enhanced through the development.</i>

Policy	Policy Team Comment
and Green Infrastructure	
ENV3 – Biodiversity and Geodiversity	<i>The landscaping scheme outlines that the biodiversity of the area will be enhanced through the development.</i>
ENV5 – Protecting and Enhancing the Borough's Landscapes	<i>The application is supported by a generally robust landscaping plan. The Copeland Settlement Landscape Character Assessment 2020 identifies opportunities to define the urban edge for Egremont (currently poorly defined) in this part of the town, as well as opportunities for GI links to the south, and the proposed layout and landscaping broadly appear to meet these aims.</i>
DM3 – Safeguarding Employment Areas	<i>The proposal will result in a relatively large amount of green infrastructure on site. However, this is considered acceptable as discussed in reference to Policy ER4 above.</i>
DM10 – Achieving Quality of Place	<i>The Strategic Policy team considers the proposal to broadly accord with the principles in DM10, although there is potential for conflict with Criterion B) in terms of impact on wider setting. The reasoning behind this position, and potential solutions, are outlined in the discussion later in the response.</i>
DM11 – Sustainable Development Standards	<i>The Strategic Policy team welcomes the inclusion of PV panels on the roof of the buildings, which as well as being more sustainable would also improve the viability of any fledgling businesses within the start-up areas.</i>
DM26 - Landscaping	<i>The Landscaping Plan proposed provides a positive framework for the development and also to enhance the urban edge for Egremont in this location as identified in the SLCA 2020. In support of paragraph 4 we wonder whether allowing the existing hedgerow along at A595 to grow a little higher could provide further mitigation (if this is possible) as it appears to be cut low in the photos for viewpoint 4 in the LVIA. This could soften the development and views across the site to the wider town and St Bees headland</i>

Other Policies for Consideration:

DM28

Copeland Local Plan 2021-2038

Development of the Emerging Local Plan

The Council is in the process of producing a new Local Plan to replace the Core Strategy and Development Management Policies 2013-2028. This will cover the period 2021-2038.

The Copeland Local Plan Publication Draft is going through public Examination by the Planning Inspectorate, the Hearings have now ended, and the Inspector's Post Hearings Letter is now publicly available.

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 the National Planning Policy Framework (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).

The Local Plan is at a final stage and all emerging policies are considered by the Council to be sound and consistent with the NPPF unless the Inspector's letter highlights otherwise.

The weight policies can be given is therefore dependent upon the significance of the likely Main Modifications proposed by the Inspector (which arise from submitted modifications proposed by the Council alongside the Publication Draft as well as those generated through the hearing session action points). The consultation on the Inspector's Main Modifications to the Plan is likely to take place in September/October 2023.

The most relevant policies in the Local Plan Publication Draft to the application are:

Policy	Policy Team Comments
Strategic Policy DS3PU Settlement Hierarchy; Strategic Policy DS4PU Settlement Boundaries	<i>The proposal is for a substantive amount of active employment space. While there are no outlined % goals for employment development per settlement area, the Strategic Policy team considers the amount suggested appropriate for Egremont as a Key Service Centre. This is considered an "expansion of existing business" outlined in Policy E2PU.</i> <i>The development site is within the settlement boundary for Egremont as per the emerging Local Plan.</i>
Policy DS6PU Design and Development Standards	<i>While generally in accordance with Policy DS6PU, the application does raise some issues with criteria B) and M). The Strategic Planning team considers these issues to be resolvable, as outlined in the discussion.</i>
DS7PU Hard and Soft Landscaping	<i>The application is accompanied by a robust landscaping scheme. The layout proposed secures the aims of Policy DS7PU and several other policies.</i>
DS9: Sustainable Urban Drainage	<i>The application provides an open SUDs system</i>
DS10PU: Soils, Contamination and Land Stability	<i>The application outlines the need for topography changes, as such it should be supported by Soil Resource Plan.</i>
E1PU: Economic Growth	<i>The economy of Copeland and Egremont will be strengthened and broadened by the development and the opening of employment land. It is expected that this development will also help to support Growth Scenarios regarding Sellafield Supply-Chain capture outlined within the Copeland Economic Development Needs Assessment (EDNA).</i>
E2PU: Location of Employment	<i>The application provides appropriate uses and adjacent uses and is of an appropriate scale for Egremont as Key Service Centre.</i> <i>The application is within the proposed extension of the employment allocation.</i>

Policy	Policy Team Comments
E5PU: Employment Sites and Allocations	<p><i>The application site is located on an undeveloped portion of Employment Allocation ES7</i></p> <p><i>While the application contains a degree of retail uses, Strategic Planning is content with the justification provided that this is a trade counter rather than general retail sales.</i></p>
N1PU: Conserving and Enhancing Biodiversity and Geodiversity	<i>This policy requires a Construction Environmental Management Plan to be submitted where appropriate to ensure that sustainable construction methods are used where possible.</i>
N3PU: Biodiversity Net Gain	<i>The applicant has provided a BNG contribution above the policy requirement of 10% and this is positive.</i>
Policy N6PU: Landscape Protection	<i>The application is supported by a thorough landscape assessment and plan which the Strategic Planning team considers generally robust.</i>
Strategic Policy N9PU: Green Infrastructure	<i>The landscape management plan outlines the protection and enhancement of green-infrastructure, and this is positive.</i>
Policy N13PU: Woodlands, Trees and Hedgerows	<p><i>The development extends and enhances the existing treescape and hedgerows and this is welcomed.</i></p> <p><i>However, we wonder whether there are opportunities to further expand the hedgerow adjacent to the A595 and, in doing so, secure a greater resonance with the national design guide.</i></p>

Other Policies for Consideration:

CO4

Further Discussion

Landscaping and the Townscape of Egremont (relating to Policies DM10, DM26 and DS6PU)

While the Landscape Visual Appraisal is thorough and addresses several potential concerns. The Strategic Planning team is concerned about the visual impact generated from Viewpoint 4 on the A595. The National Design Guide highlights the importance of maintaining a “sense of place” and for both residents and visitors, the route north from the A595 is a crucial element of this as it provides a vista of Egremont, its rural and coastal backdrop, and the St Bees headland.

Strategic Planning would question whether a modest increase in the height of the natural hedgerow shown in Viewpoint 4 would help to soften the visual impact of the development on the townscape and, by extension, reduce harm generated to Egremont’s sense of place.

Minimising Light Pollution (relating to DS6PU)

Strategic Planning notes that the carpark luminaries are to be automatically turned off at 22:00. In particular, during the winter months, this could contribute negatively towards light pollution and so stand in conflict to the Council’s commitment to maintain dark skies. Strategic Planning would

suggest an earlier time which more closely aligns with trading hours. Likewise, the duration of lighting will negatively impact the ecological value generated through woodland extension through impact upon wildlife patterns.

Conclusion

Overall, the Strategic Planning team is supportive of this application as it will provide economic growth in a manner that is largely consistent with local and national planning policy. We consider the issues raised – regarding visual harm and lighting -- to be readily mitigated through modest alterations to the screening and adjustments reducing the timing of the external lighting to better align with operational hours.