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Mr C Harrison  
Principal Planning Officer - Copeland area  
Cumberland Council  
The Copeland Centre  
Catherine Street  
Whitehaven  
CA28 7SJ

4<sup>th</sup> April 2023

Dear Chris,

**Re: Story Homes, Edgehill Park Phase 4, Planning Application No. 4/22/2332/OF1 – Submission of amended plans and information (107 dwelling houses and associated infrastructure including landscaping, open space, access, highway and drainage)**

I write further to the above live planning application reference, originally submitted in August 2022 for 109 dwelling houses and associated infrastructure and further to consultee, public and planning officer comments to our plans.

We thank responders for their comments, which have been reviewed by our team with a view to improving our plans in accordance with planning policy and material considerations. I am therefore pleased to provide Story Homes amended planning pack, with changes summarised as follows;

**Layout, Density and Housing Mix**

In seeking to address Officers concerns regarding layout, we have reduced the density in the scheme and now propose 107 dwellings (a reduction in 2 no. dwellings).

In working within the constraints of the site, we have sought to offer density relief in the northern area with less housing and adjusted road arrangement to accommodate greater amounts of planting in front gardens and additional visitor parking bays. This shall reduce the car dominance effect in this area and lead to a more attractive living environment.

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The layout is also amended in the southern area, with revised road arrangement down the hill at no greater than 1:10 gradient and hence to adoptable standards. The amendment removes the previous plot 61 which sat in a somewhat isolated location and now brings this into the streetscene. Plot 68 (previous 71) has also been repositioned to fall more in line with the street frontage that it serves and as such shall fit better in the streetscape.

As recommended by Officers, a minor change is made at plots 69-73 (previous plots 79-81) with slight reconfiguration to remove the previous built form projection in the street frontage, so that this now sits better to create an increased sense of place and openness on arrival to this area when approaching from Edgehill Park phase 3 to the west.

The amendments provide for minor changes to the overall housing mix. We now propose:

- 5 no. x 2 beds (no change)
- 39 no. x 3 beds (a reduction in 6)
- 63 no. x 4+beds (an increase in 4)

We note the comments from Copeland Strategic Housing who acknowledge opportunity for variation to the SHMA evidence mix. This flexibility is welcome particularly at Edgehill Park, whereby Story Homes has historically sold a greater proportion of 4+ beds than the SHMA mix. For example and in the calendar year of 2022 at Edgehill Park, Story Homes has sold 45 new homes of which 30 were for 4+beds properties. Many of our buyers work locally at Sellafield, and our larger house types appeal to their housing needs.

Our amended proposals are still viable and as such the affordable housing provision at 10 no. dwellings or 10% of total quantum is retained. However, the viability of the scheme is under threat (see s106 contributions to follow).

### **Boundary Treatments**

We note the Planning Officer comments regarding the previous proposal for timber boundary treatment adjacent highways and footways. We duly replace these with full brick wall equivalents to maintain a longer lasting and improved streetscene visual impact.

### **Drainage**

We are thankful for the helpful LLFA consultation response comments. The surface water drainage storage network has been upsized from 40% climate change allowance to 50% in line with the LLFA comments – see revised calculations, and updated engineering plan suite amongst other things including a new Exceedance Route plan and revised Flood Risk Assessment (FRA).

The proposed build of 107 dwellings is to be tendered as one single continuous build phase and we submit a Construction Management Plan showing the proposed build route. To help demonstrate the different build stages of surface water management, we hereby submit 3 no. stage/subphase plans from the initial strip and earthworks to plot build. Of note, the Surface Water Management Plan Phases 1 and 2 were submitted and approved as part of the separate Story Homes engineering

application for the site under planning reference 4/22/2217/0F1 approved 24<sup>th</sup> November 2022. We also submit our proposed silt bag detail, Construction Method Statement March 2023 and Silt Management Reporting Plan March 2023.

### **Highways – Design**

In response to the Highways Officer comments, we can confirm that the layout shall incorporate a crossing point between plots 7 and 41. The position of the proposed crossing point at this location is slightly more direct than the previous plan, but still allows for some green verge wrapping around the corner on plot 41 side, to help make an attractive entrance to this street. We feel this an acceptable design / permeability balance. A more direct route can be refined should the LPA deem it necessary, and we would happily accept a planning condition for agreement of such finer details.

In character with the wider Edgehill Park, there is a mixture of dual and single footpaths adjacent to the proposed adoptable highways. In particular, the layout now incorporates formal footpaths on both sides of the circa 90 degree radius bend in the northern section to overcome a suggested safety issue. In considering safety in general, the road layout is designed in such a way which shall help preclude speeding cars by punctuated private drives, road intersections and no long straight runs.

We have increased the number of dedicated visitor parking bays to 18 bays and there are 7 no. feasible on-street visitor parking opportunities, meaning a total of 25 visitor parking spaces. Each dwelling shall maintain a minimum of 2 private parking spaces, not including garages. Overall and as per Parking Provision plan VER 104 Rev G, there are a total of 255 parking spaces identified on this development, which averages 2.38 per dwelling and is considered plentiful for this scheme.

Turning to the Public Right of Way (PRoW) no. 431031 and the proposed surfacing detail, we refer to our new strategy identified in Hard Surfaces Treatment Plan VER 105 G. The strategy includes a continuation of the Hoggin bound surfacing that is already installed on the same PRoW to the west and between Edgehill Park phases 2 and 3. The Hoggin material is considered a suitable surface material where shown, but we propose a transition to more durable tarmac where the land gradient steepens and adjacent to the road.

For clarity and with reference to wider permeability stakeholder comments, within our site Story shall provide a pedestrian access to the north boundary. This shall enable a potential future connection to Wastwater Road by others. I am afraid we can not accept a Grampian condition for wider pedestrian connections beyond the site on land which we do not control, but the opportunity remains for an informal route through the intervening grass and scrub land.

### **Archaeology**

Since the submission of this application, Story Homes has commissioned 'CFA' Archaeologists to carry out a trial trench evaluation report in October 2022. The report records no archaeological features, furrows or field boundaries in any of the trenches.

The report was provided as part of separate Story Homes engineering planning application and discharge of condition at the site (ref 4/22/2470/DOC) and the County Council Historic Environment



Officer responded on 6<sup>th</sup> December 2022 to confirm that no further archaeological work was necessary.

To that end, for completeness and to avoid a repetitive planning condition, Story Homes hereby submits the same report ref: Y608/22 for consideration in this application.

### **S106 Contributions**

We duly note the Local Education Authority (LEA) position and their request for s106 contributions to facilitate primary school aged children in local schools. Story Homes accepts the evidence provided and we calculate 11 no. primary places being necessary because of the revised mix, meaning 11 x multiplier of £18,102 = **£199,122**. We welcome LEA verification to our calculations based on our revised mix.

Turning to the contribution request of the Highways Authority (which total £227,380), Story Homes has commissioned 'iTransport' our appointed transport consultants, to review these requests in relation to the impact from our proposed development. We politely refer to the iTransport rebuttal letter to Story Homes of 14<sup>th</sup> March 2023.

As can be read, there are a number of counter challenges to each of the s106 Highway requests. In conclusion and in relation to planning tests, we consider the requests are not:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

We welcome further discussion with the Council but wish to point out that notwithstanding the foregoing and should the highway requests be accepted, it is highly likely the development would become unviable. This in light of rising build costs and the site's abnormal costs to be factored against a considered average revenue return compared to the wider Cumbrian market.

### **Public Comments inc Land Ownership, Trees and Biodiversity**

We note the comments received from the property 'High House' and can confirm that the redline represents the application site and is land owned by Story Homes. In seeking to maintain the long-term views of the Lake District National Park from High House and its grounds, as suggested, we have amended the landscaping plans and reduced the amount of trees and altered their position in front of this property.

Indeed, we have reviewed the wider planting strategy and consolidated the amount of tree planting and landscaping in the proposed green belt of land that shall wrap around the development platform to the east and south. The plan still includes for good amount of varied tree planting that shall provide for landscaping mitigation and biodiversity benefits. The revised Biodiversity Net Gain score remains high at +98.68% habitat (area) units, and +100% hedgerow (linear) units, as reported in the updated

Urban Green Biodiversity Net Gain Design Stage Assessment (dated April 2023) and the supporting Biodiversity Enhancement Management Plan (dated April 2023).

We note the separate objector comments regarding impact upon wildlife including deer and barn owls. There is not considered a likelihood of such species habitat being harmed by this new phase and we respectfully refer to our submitted Ecology Appraisal. We also note there is no objection from Natural England. The land is mainly poor semi improved (grazing) grassland and while building on the site shall reduce transient visits by passing wildlife, the wider advantages and biodiversity net gains including new pond and widespread new planting, all of which shall be managed, are considered to outweigh this impact.

Please find enclosed amended documents submission pack, including Submission Document Tracker dated 4<sup>th</sup> April 2023 identifying the extant documents put forward for planning determination.

Yours sincerely

A handwritten signature in black ink, appearing to read "P.P. P. McNally".

**Adam McNally**

Senior Land & Planning Manager – Region 1 Cumbria and Scotland

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