

SRE ASSOCIATES LTD

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Ref: 4/20/2455/0F1

10 June 2021

Mr C Harrison
Development Management
Copeland Borough Council

Dear Mr Harrison,

Application Reference 4/20/2455/0F1 - Land South of Waters Edge Close, Kells.

I refer to the email queries regarding the above planning submissions.

Affordable Housing:

As detailed in the application, we are proposing 10% of the total units on site as affordable. This is in accordance with Paragraph 64 of the National Planning Policy Framework (NPPF) on affordable housing which states as follows:

'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.'

It has been queried that this provision of 10% is not in accordance with Policy SS3 of the Copeland Local Plan. However, as you will be aware, this Plan was adopted in 2013, whereas the most recent version of the NPPF was produced in February 2019. Therefore, it is considered that the national framework, being far more recent, is more relevant and should be followed for planning applications. In addition, it is noted that Copeland are now following this level of affordable provision in Policy H8PO of the preferred options draft of September 2020.

Open Space:

The proposed open space within the site will be address in the long term by the formation of a management company for the site.

Proposed Layout:

Attached is an amended site layout plan which the architect has revised and checked to ensure that all of dwellings meet the 21m and 12m separation distances as detailed in Policy DM12 of the adopted Copeland Local Plan.

We have reviewed the layout further, and while the comments about the change in levels is noted, we are unable to amend the layout on this particular point. Further changes to the location of these plots would require a full redesign and likely the loss of units on a financially difficult brownfield site, where affordable housing will be provided in accordance with national policy.

We assume that this is just guidance however, given that it is not a requirement of Policy DM12 of the Copeland Local Plan which detailed the separation distances required.

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The revised housetypes for plots 9 and 24 are attached, which detail windows in the gable elevations, fronting the main access. Neither David nor myself were aware of the discussion regarding similar to plots 2 and 3, and consider that the angle of the plots provide a suitable arrangement to the site access. The proposed levels of Plots 1 and 2 have been designed with the drainage detail in mind, and the engineer has confirmed that it will be difficult to amend this detail further.

Hard Surfacing:

This has all now been included on the proposed hard surfaces plan.

Landscaping Plan:

Please find an updated version attached.

Parking Provision:

As you will be aware from the Parking Plan, there is an over provision of parking proposed within the site, in total of visitor and in curtilage spaces. Additional parking has been included within plots, which the applicant has agreed previously with Cumbria County Council on another scheme.

CCC Comments:

- 1) The works will be completed by Story Home as part of a contractual agreement with Gleeson Homes on the land purchase for the Water's Edge site.
- 2) This has been updated and issued within the most recent amendments.
- 3) Highway drainage can be found on drawing TC/T19360/A1/201.
- 4) We are aware of groundwater seepages across the site which are perched within granular made ground. Allowances have been made to assess the effects of buoyancy in the detailed design as this is when a manufacturer will be brought onboard. The tank is next to the road in a POS area easily accessible from the road to jet and survey and therefore no track is required.
- 5) There is now an exceedance route plan within the documents.
- 6) The surface water system that are to remain private will be part of the work for the management company of the site, which will include maintenance within the manufacturers details.

Reptile Survey:

All 14 visits to the site have now been made by the Ecologist in line with their scope of work. As such the final report on this is also attached.

If you have any further queries on this, please let me know.

Kind regards,

Simon Blacker MRTPI
SRE Associates