

Strategic Planning Response to Planning Application: 4/21/2432/0F1, Former Marchon Chemical Factory, Whitehaven

Accordance with relevant policies

The most relevant policies to the application are:

Policy	Policy Team Comments
Strategic Policy DS1 Settlement Hierarchy; Strategic Policy DS2 Settlement Boundaries	The proposal is within the settlement boundary of the Principal Town, with only SUDs and pathways beyond it.
Strategic Policy DS3 Planning Obligations	Due to the scale of the proposed development, the Council would require developer contributions under this policy. This would be necessary to mitigate the impact of the development and make the proposal acceptable. While there has been an agreement regarding Highways elements, a viability assessment, which has been reviewed by the Council, highlights difficulties in providing education and affordable housing contributions required by policy due to the historic uses on the site.
Policy DS5 Hard and Soft Landscaping	This policy specifies the considerations of what the Council considers to be a necessary Landscaping Scheme:
Policy DS8 Soils, Contamination and Land Stability	Paragraph 6.7.5 states: <i>“The Council recognises that developing on brownfield land can be more costly and affect a scheme’s viability. To help with this there is often support and funding available (such as Homes England’s Brownfield Land Fund) to support development on such challenging sites, and the Council would expect applicants to provide evidence illustrating that such opportunities have been fully pursued to ensure developments meet of the policy requirements within this Local Plan”</i> The acquisition of such funds could improve the viability of the scheme, and thus facilitate a greater ease surrounding relevant contributions. Planning Policy understand that no funds are currently available, but would ask that necessary considerations are given to investigate whether this situation changes in the future. This could help improve the viability of a larger scheme such as this over the longer term, which is built over many years.
Strategic Policy E6 Opportunity Sites	The proposal shares a southern boundary with the Marchon Opportunity Site (OWH13) which is considered suitable for a range and mix of uses, including residential.

Policy	Policy Team Comments
Strategic Policy H1 Improving the Housing Offer; Strategic Policy H2 Housing Requirement; Strategic Policy H3 Housing delivery; Strategic Policy H4 Distribution of Housing	The proposal is for a scheme through which to deliver housing on housing allocation (HWH5). Development of this site will provide a significant contribution towards meetings Whitehaven's housing needs over the Plan period. The housing trajectory outlines that from HWH5 is expected to provide 35 houses per annum from 27/28. This will total 325 overall throughout the Plan period and continue beyond the end of the Plan period.
Strategic Policy H5 Housing Allocations	The proposal covers housing allocation HWH5, with the housing development now contained wholly within the site boundary, which is welcomed.
Policy H6 New Housing Development	Planning Policy are now satisfied that the application meets Policy H6
Policy H7 Housing Density and Mix	The proposal does not align with the preferred housing mix identified within the SHMA.
Strategic Policy H8 Affordable Housing	The policy requires at least 10% of units to be affordable and identifies the appropriate tenure split. This is to meet the identified need within the Whitehaven area. The applicant has argued that it is not possible to provide any affordable housing due to viability issues. While this is accepted, Planning Policy take the view that this should be kept under review utilising the Viability Review Mechanism outlined in the final paragraph of Policy H8. This could enable the future provision of affordable housing to meet the identified needs if viability improves.
Strategic Policy SC1 Health and Wellbeing	The proposal has outlined contribution to active travel facilities on High Road, alongside improvements to the English Coastal Path.
Strategic Policy N1 Conserving and Enhancing Biodiversity and Geodiversity	The HRA for the Copeland Local Plan outlines the potential impacts of development on the Solway SPA and St Bees SSSI. It is important that the outlined Construction Environmental Management Plan is secured.

Policy	Policy Team Comments
Strategic Policy N3 Biodiversity Net Gain	Policy N3 requires a 10% Net-Gain in Biodiversity from development. The application has provided an assessment which suggests this is the case.
Strategic Policy N6 Landscape Protection	It is to the applicant's merit that the <i>"Prominent coastal strip maintain the undeveloped coastal character and defines the boundary of the undeveloped edge of Whitehaven."</i> Is recognised. It is important that all questions of design take full account of this landscape character.
Strategic Policy N7 St Bees and Whitehaven Heritage Coast	The applicant is currently planning on using areas that fall within the St Bees and Whitehaven Heritage Coast for SUDs and similar ancillary elements. This is a significant improvement on the previous proposal to development within the Heritage Coast. However, it is important that these ancillary elements align with the policy requirement: <i>"must conserve, protect and enhance the Heritage Coast and its setting and take opportunities to encourage the public to enjoy and understand the area by improving public access and interpretation where possible. Developers should demonstrate that they have taken into consideration the features that contribute to the special character of the area and the importance of its conservation."</i> Likewise, see the Housing Profile: <i>"Provision of habitat for nesting birds, by including shrub, hedgerow or tree planting in any final landscape plans, particularly on the western boundary close to the St Bees SSSI. The site has a large footprint, so possibly scope for habitat creation. Any habitats created/retained should have connectivity to any nearby habitats and sites along the coast."</i> It would be useful for the applicant to provide a holistic approach to the SUDs, one that ensures the qualities of the Heritage Coast are not only <i>conserved</i> (as specified within the Planning Statement) but are also enhanced. The additional costs of facilitating this would likely be minimal.
Strategic Policy N8 The Undeveloped Coast	The applicant is currently planning on using the undeveloped coast for SUDs and similar ancillary elements. This is to be welcomed, provided these elements ensure that they contribute to "the management of the undeveloped coast for biodiversity" as required by policy.
Strategic Policy BE1 Heritage Assets & BE2 Designated Heritage Assets	There are a number of heritage assets in proximity to the site including the Barrowmouth Scheduled Ancient Monument. The Council's Heritage Impact Assessment identifies that development of the allocated site could cause harm if appropriate mitigation is not put in place. The Council has prepared a Heritage Impact Assessment for HWH5 which states:

Policy	Policy Team Comments
	<i>"Avoid encroaching too far westward within the site. Ensure character of development presented to the west is not overly suburban. The need to conceal development where possible will undoubtedly conflict with a developer's desire to make use of the views (which will, of course, block the views of the houses behind), so this conflict will need addressing using innovation"</i>

Consideration also needs to be given to these strategic Objectives of the Copeland Local Plan:

Landscapes and Built Heritage:

"Conserve and enhance all landscapes and built heritage within the borough, attaching great weight to improving the setting of the Lake District National Park and the St Bees Head and Whitehaven Heritage Coast, in addition to the many places and buildings of historical, cultural and archaeological importance and their settings."

High Quality Design:

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.

LUC Report (to consider the extension to the Heritage Coast)	
Page 41	<i>"A substantial part of the Kells Farmland can be described as "a coastline of exceptionally fine scenic quality", particularly the arable fields on the west side of the Wagon way footpath which are connected to the sea, both visually and through experiential qualities."</i> <i>"It is recommended that the fields west of the Wagon way footpath should be included, as they have a valuable coastal character linked to the cliffs. It is recommended that the boundary should follow the existing Wagon way footpath along the back of housing in Kells. This is a definite boundary, noting that there is no other equivalent feature on the ground to follow to the west closer to the cliffs. It is also undeniable that not including these fields would mean that some intrinsic, contiguous and vital parts of the coast would not be included in the extended Heritage Coast. This boundary would also allow the whole area of arable fields to be effectively managed for Heritage Coast objectives."</i>

Summary

The Policy Team supports the development of the former Marchon site, which is allocated in the Local Plan for housing (ref. HWH5), now that the housing is contained solely within this allocation.

However, the following points should be raised and addressed:

- The development has not provided sufficient contributions; particularly regarding affordable housing and education. Therefore, Planning Policy recommend that a viability review is undertaken once a substantial proportion of the homes have been completed.
- The viability of the scheme would be improved if appropriate brownfield funding opportunities are accrued. These are not currently available, but planning policy would require that the conversations surrounding potential funding pots remain ongoing in case this situation changes. This could help viability and unlock contributions to make the development more policy compliant over time, and can considered through the viability review.
- While the decision to utilise the coastal strip for SUDs – rather than housing – is welcomed, it is important that the Heritage Coast is suitably enhanced by such developments. Planning Policy would like to see that such ancillary development elements are holistic and not only *conserve* the Heritage Coast but rather actively *enhance* it.