

Cohesion Consult
Clarendon House
Leeds
LS27 7QT
FAO Stuart Ainsley

Please Contact: Nick Hayhurst
Officer Tel No: 07799075059
My Ref: PAA/22/0077
Date: 9 June 2022

Dear Sir

REQUEST FOR PRE-APPLICATION ADVICE

REFERENCE NUMBER: PAA/22/0077

RE: PROPOSED NEW LEISURE CENTRE ADJACENT TO THE SCHOOL

AT: MILLOM SCHOOL, SALTHOUSE ROAD, MILLOM

Thank you for your pre-application request form which was received on 31/05/2022.

I have now had the opportunity to review the site on the Council's GIS mapping system and the information submitted as part of this enquiry. I would advise that planning permission will be required for this development.

Site Constraints

- There are no protected trees on the site
- The site lies outside the Conservation Area and there are no Listed Buildings within the immediate vicinity of the site
- The site lies within the area where there is potential for natterjack toads to be present
- The southern section of the school complex is listed as an area where there may be potential contamination as it was formerly occupied by a brick and tile works and clay pit
- The site lies adjacent to Flood Zones 2 and 3

Planning Policy

I would advise that the following policies of the Copeland Local Plan 2013 – 2028 relevant to this proposal are as follows:

- Policy ST1 – Strategic Development Principles

- Policy ST2 – Spatial Development Strategy
- Policy ST3 – Development Priorities
- Policy ST4 – Providing Infrastructure
- ER9 – Key Service Centres
- ER10 – Renaissance through tourism
- Policy T1 – Improving Accessibility and Transport
- SS4 – Community and Cultural Facilities and Services
- ENV 1 Flood Risk and Risk Management
- Policy ENV3 – Biodiversity and Geodiversity
- Policy ENV5 – Protecting and Enhancing the Borough's Landscapes
- Policy DM10 – Achieving Quality of Place
- Policy DM11 – Sustainable Development Standards
- DM21 – Protecting Community Facilities
- Policy DM22 – Accessible Developments
- DM24 – Development Proposals and Flood Risk
- Policy DM25 – Protecting Nature Conservation Sites, Habitats and Species
- Policy DM26 – Landscaping

You can access the Copeland Local Plan 2013 – 2028 using the link below. This contains details of the relevant policies listed above.

http://www.copeland.gov.uk/sites/default/files/attachments/copeland_local_plan_2013_2028.pdf

Emerging Copeland Local Plan

The emerging Copeland Local Plan 2017-2035 has recently been the subject of a Publication Draft Consultation. The Publication Draft Consultation builds upon the previously completed Issues and Options and Preferred Options consultations. Given the stage of preparation of the Copeland Local Plan 2017-2035 some weight can be attached to policies within the Publication Draft where no objections have been received. The Publication Draft provides an indication of the direction of travel of the emerging planning policies, which themselves have been developed in accordance with the provisions of the National Planning Policy Framework.

The relevant policies include: DS2PU, DS3PU, DS5PU, SC1PU, SC2PU, SC3PU, DS1PU, DS6PU, DS7PU, DS8PU, DS9PU, DS10PU, DS11PU, SC4PU, N1PU and BE3PU.

You can access a copy of the Publication Draft using the link below:-

[Local Plan 2021-2038 Publication Draft Consultation | Copeland Borough Council](#)

Principle of Development

The site is contained within the existing school complex which falls within the designated settlement boundary of Millom. Millom is listed under Policy ST2 as one of the Key Service Centres within the Borough where appropriately scaled development is supported.

You will recall that consideration has previously been given to a number of sites within Millom to accommodate the development proposed. The Local Planning Authority has previously advised that this site was the preferred location for a development of this nature as it relates well to the existing school complex and maximises sports provision on the site. The separation distances with nearby residential properties is also likely to help to mitigate its potential impact.

The proposals would provide enhanced sports and community facilities within Millom and the wider locality. This would accord with the provisions of Policies ST1 and SS4 and DM21 of the adopted Local Plan.

On this basis the principle of development on this site is considered to be acceptable.

Material Planning Considerations

Flood Risk and Drainage

The site lies adjacent to Flood Zones 2 and 3 as shown on the extract plan below which is taken from the Councils GIS layers:-



Consequently, any planning application should be accompanied by a Flood Risk Assessment and Drainage Strategy. It is important that any development on the site does not result in increased flood risk elsewhere. Any mitigation measures required should be clearly set out in the FRA.

Highway Safety and Parking

Any planning application should be supported by a Transport Assessment to ensure that the existing highway network has capacity to accommodate the volume of traffic that is likely to be generated by this form of development.

Sustainable forms of transport should be encouraged, including connectivity between the site and the town centre for pedestrians and cyclists. A draft Travel Plan should also be submitted to support the application.

Parking should be provided to meet the requirements as set out in the Cumbria Development Design Guide.

Ground Conditions

This site is not within an area known for coal mining.

Whilst the main area of the site is not known to have any contamination issues the southern section of the school land is known to have been occupied by a brick works and clay pit. On this basis any planning application should be accompanied by a Desktop Phase 1 report to cover these issues.

Ecology and Nature Conservation

The whole of the school site and the surrounding land is listed as an area where there is potential for natterjack toads. You should submit an ecology assessment as part of your submission that provides clarity on this issue and sets out any mitigation measures that may be required.

The addition of additional landscaping to enhance the ecological benefit of the site is welcome and should be clearly documented.

Trees and Landscaping

As the extension to the car park lies adjacent to some existing mature trees an Arboricultural Assessment should be provided to verify that this part of the site can be developed without having an adverse impact on these trees.

The application should also be supported by a full and detailed landscaping scheme which includes a scheme of proposed maintenance in order to help soften the visual appearance of the development.

Landscape and Visual Assessment

Given that the proposed development will be within the existing school complex and will be viewed in connection with the existing building groups on site the impacts on the landscape are likely to be minimal. However, any Design and Access Statement should contain a section that considers this issue. Landscaping should be also considered in order to soften and minimise potential impacts from key view outside the site boundary.

Layout, Scale and Appearance

It is assumed that the design of the building has not yet been finalised. As previously stated the siting adjacent to other buildings within the school complex will help to mitigate its impact within the locality.

It is accepted that the scale of the building is determined, to some extent, by its function. Notwithstanding this consideration should be given to the use of materials and colour to try and break up its bulk and scale and massing when viewed from outside the site.

The use of a contemporary design and the incorporation of active frontages is supported.

The use of appropriate boundary treatments needs to be given careful consideration to minimise the visual impact within the locality, particularly with regards to the service yard.

Impacts on Residential Amenity

As the site is flanked by existing residential properties it is imperative that consideration is given to the potential impacts on residential amenity. Noise should be kept to a minimum and the buildings should be designed to contain noise. A Noise Assessment should be submitted to support the application.

The extent and positioning of any external lighting would also require careful consideration in order to minimise its impact on residential amenity.

Sustainability

The incorporation of sustainable measures as part of the design of the building is welcome. Any generation of energy from on-site provision is also encouraged on the basis that any visual impact can be minimised.

Impact on Provision of Sports Facilities

As the proposal involves the loss of some playground space it is essential that Sports England are involved in the proposals at an early stage. They are a key consultee and their support for the project is vital.

Summary

The proposal to create additional sporting and community facilities on the existing school site is welcome. This is the best site to accommodate the scale and mixture of uses proposed. Its location within the settlement boundary of Millom, which is one of the Key Centres within the Local Plan, is acceptable in principle.

A number of material considerations need to be addressed as part of any planning application. This will require the submission of a number of supporting documents and relevant assessments as set out above.

The Local Planning Authority is keen to engage in proactive discussion to support the submission of a planning application for the proposals as outlined. We offer Pre application advice free of charge.

Please note that the advice in this letter is given in good faith on the basis of the information available at the present time. The advice may be subject to revision following further examination or consultation, or where additional information comes to light, and is therefore not binding on any future recommendation which may be made to the Council or any formal decision by the Council.

A handwritten signature in dark ink, appearing to read 'N. Hayhurst', with a stylized flourish at the end.

N. Hayhurst
Head of Planning and Place