

HOLDSWORTH DESIGN PRACTICE TD. (AGENT)

CONSULTEE AND OBJECTION LETTER RESPONSE TO PLANNING APPLICATION;

APPLICATION REF NO 4/21/2411/0F1 (PREVIOUSLY 4/21/2252/0F1)

1. CDF

CDF wrote;

Please can the applicant confirm that this would the applicant confirm

A) that the cabin for use of disabled people will be accessible for wheelchair users –

HDP the Cabin supplier does not produce a Part M compliant cabin. The idea for the single allocated cabin to for users who are less able, elderly or ambulant. It will be made clear at point of booking that the cabins have this limitation.

B) that the shower in the toilet block will be accessible for wheelchair users

HDP Yes they will be wheelchair accessible and Part M compliant.

C) that the toilet in the cabin will be accessible for wheelchair users or does the applicant expect the a wheelchair user to go to the toilet block to use the toilet ?

HDP Yes the toilet will be Part M compliant, however it is not intended that cabin users should use this, although they can. The site showers are designed for, but not exclusively, use by guests with motorhomes where there are persons who are less able, ambulant, or elderly.

2. FLOOD & COASTAL DEFENCE

Happy to have condition of approval to cover all points raised by Flood & Coastal Defense.

3. UNITED UTILITIES

Happy to have conditions of approval suggested applied.

4. PARISH COUNCIL

Responses to points raised below;

- A. Para 3. Cumbria Highways raised no concern in regard to the “dual” entrance.
- B. Para 4. Cumbria Highways have been consulted prior to application submission and have not raised these points as a concern.
- C. Para 5. Flood and Coastal defense have stated that *‘The site is in a location that is considered as being at a low risk of flooding’* and United Utilities have requested conditions of approval to be applied which we are happy to agree to and undertake. There has been no objection from these consultees.

As a point of note, the water course to the east and south of the site has been cleared by the applicant and during the recent (current to date of document) heavy rain have films of the watercourse running freely and not being overwhelmed.

- D. Para 6. The Parish Council concerns in regard to wildlife should be sent in a written statement with evidence. Whilst the site has been cleared of dense undergrowth it should be recorded that the applicant has, as stated in the submitted D&A statement,

‘Within the land owned by the applicant they have installed 15 bird boxes, 4 bat boxes and 1 owl box. As a side note the applicant has, as part of Partfield House renovations, drained and cleaned a historic pond to encourage and aid wildlife to the site.’

There is also an intent to, as stated within the D&A statement, to undertake wild flower planting, renovate and relay missing or damaged hedgerows and undertake replanting within the woodland of unsafe and felled with native trees. It should be noted that the applicant has not felled any trees, the line of Lime trees were felled by Electricity North West before the applicant purchased the land.

The applicant is undertaking considerable work and expense to ensure that the site encourages wildlife, all undertaken with research by the applicant. As a side note, to bolster the applicant’s ethos, they have received a grant from Lake District Foundation Real Hedge Fund for Boundary hedge rejuvenation.

5. RESILIENCE UNIT – SELLAFFIELD

No objections received.

6. TOURISM (email from Katie Read)

The below is an exert from Katie Read from consultee response.

‘There has been a significant growth in the domestic motorhome market and motorhome visits to Cumbria during 2020. Although there is no Copeland specific data, anecdotal evidence suggests that Copeland has not benefited from attract and disperse with motorhome owners largely choosing the south and central Lakes to visit. This presents an opportunity to grow the market sustainably in Copeland.’

The applicant and Katie have been in correspondence with each other throughout the projects concept and the tourism board are fully supportive of the project.

7. ABORCULURISTS

Awaiting Iain comment

8. CONSERVATION

The Officer has provided the following comments:

I went up to Drigg yesterday and had a look at the site, and note that it does provide an area of rurality right in the middle of this settlement that plays an effective role in counteracting the mid-to late-twentieth century residential infill, driveways and impression of cars.

The settlement of Drigg is set within a rural setting. It is a linear settlement bounded by rurality to the North and South. See 'wider context' image on USH.CS.1222.PL10. The proposed development does not erode this rurality setting to Drigg Hall or the wider situation. The proposed development should not be targeted to compensate for the, in relative recent terms, development that has been undertaken to erode the setting of Drigg Hall. Minimal trees and boundary hedgerow are to be removed, at the request of the applicant, with the boundary treatment for the entrance being as minimal as is possible to comply with Cumbria Highways guidance.

I do not agree that Partfield Park can be classed as within the setting of a listed building with reference to the below;

There are significantly large modern agricultural sheds within 40m of Drigg Hall. Understanding the reasoning for the need for such sheds they still represent a modern addition that under the conservation officers view must be within the setting of the Listed Building, if Partfield Park is classed as such.

Drigg Hall itself has a swimming pool within the boundary of the Hall, this cannot be considered in keeping or not showing harm to the setting of the listed building by virtue of the modernity.

Partfield House, the applicants property, is currently undergoing a significant remodel and extension. The conservation officer did not comment on this development, it sits within 40m of Drigg Hall, directly opposite.

This is not only true in a general sense, but the area of trees also frames a very dramatic view of the front of Drigg Hall along the B5344 from the West (see attached photo). In reality it's more impressive even than it looks on this image. I appreciate that the intention is to leave trees around the edge, but don't believe it will be possible to retain the pastoral effect currently in evidence.

The 'dramatic view' is a very fine band width of a view point taken from a side road, highlighted by the magenta dashed lines on the drawing USH.CS.1222.PL10. The existing tree and hedgerow screening provided to the western boundary of Partfield Park will not be altered and therefore not alter this viewpoint. The entrance to the Park will not be visible from this viewpoint as it is around the corner. Therefore I do not see how the pastoral effect will be lost. The boundary screening is so dense that the internal development will not be visible from outside the boundary.

Obviously the overall balance is not for me to say, but I remain of the view that the development would have a negative impact on the Hall's setting – losing the tree density, greatly increasing the size and visibility of the access point, increasing the amount of traffic, and providing views into the site of surfacing, parked vehicles and a shop, will all have a negative impact – less-than-substantial, undoubtedly, but still I think meriting special regard.

The tree density that will be removed is within the site and not be noticeable from outside of the site. The trees that have been previously felled have not impacted on the viewpoint of the image. I fail to

see how the setting of Drigg Hall will be negatively impacted from development that cannot be seen from Drigg Hall, nor the wider context of Drigg Hall. The images on USH.CS.1222.PL10 that are taken from within the site show the density of the boundary trees and hedges.

It should be noted that the applicant has not felled any trees, the line of Lime trees were felled by Electricity North West before the applicant purchased the land.

A smaller, more modest proposal that didn't exploit the site so heavily would seem more justifiable in heritage terms,

A 'smaller more modest proposal' would require the same internal development than the current proposed development. Reducing the number of cabins and Motorhome bays would not alter the entrance requirements, the size of the shop cabin or significantly reduce the internal access road. Therefore, if a smaller scale development is acceptable, in heritage terms, then the proposed development is also acceptable, in that it would be the same in its principal and the key elements put forward as causing harm to Drigg Hall would remain.

and with respect to local plan policies ST1C, ENV4A and DM27A and D

with regard to the planning policies stated;

ST1C Protect, enhance and restore the Borough's valued assets

i. Protect and enhance areas, sites, species and features of biodiversity value, landscapes and the undeveloped coast

The site has been managed by the applicant after years of neglect, clearing a historic pond, removed invasive undergrowth, tree management and introduction of wild meadows and nesting boxes for birds and wildlife. In the time the applicant has had the overall site they have seen an increase in wildlife and make the effort to encourage wildlife. For sites such as this to provide a sustainable benefit to biodiversity they have to be managed.

ii. Protect and enhance the Borough's cultural and historic features and their settings.

The proposed development whilst near to the historic feature of Drigg Hall it can be demonstrated that there is no impact as it cannot be seen due to the density of the boundary hedgerow and trees retained within the site.

iii. Provide and enhance recreational opportunities for the Borough's residents and its visitors, protecting existing provision and ensuring that future development meets appropriate standards in terms of quantity and quality.

It is feel this is met in terms of quantity and quality. For a site such as to benefit the users and be sustainable as an asset it has to be viable. The applicants have considered what is the minimum number of cabins and Motorhome bays to make a site such as this viable, and therefore sustainable.

iv. Manage development pressures to protect the Borough's agricultural assets

This development does not impact on the immediate and wider agricultural assets.

v. Support the reclamation and redevelopment or restoration of the Borough's vacant or derelict sites, whilst taking account of landscape, biodiversity and historic environment objectives

The proposed development meets this statement. The site was vacant and overgrown in need of management. Landscaping has been taken into account, biodiversity is being encouraged

and the density and placement of the specific areas of the development take account of the historic environment, in that the more dense areas are located to the further away element of the site from local properties and Drigg Hall.

vi. **Ensure development minimises air, ground and water pollution.**

The proposed development will not impact on any of the elements. All drainage will meet local authority criteria.

Policy ENV4 – Heritage Assets

The Council's policy is to maximise the value of the Borough's heritage assets by:

A Protecting listed buildings, conservation areas and other townscape and rural

features considered to be of historic, archaeological or cultural value

by virtue of the heavy and established screening of the site, the proximity of the proposed site to Drigg Hall, that there is also modern development in closer proximity to Drigg hall with more density than the proposed development it is felt that no harm will come to the setting of Drigg Hall.

Whilst not under this application, but works undertaken by the applicant, it should be considered that there has been substantial works to improve the immediate setting of Drigg Hall to the original walled garden. This has been reinstated, and where walls have been taken down to facilitate this the bricks have been saved and cleaned for reinstatement of the wall near to Partfeld House. The frontage to Partfield house has also been improved which enhances the setting of Drigg Hall to reinstate its historic setting, this is improving and not harming, especially when viewed in an overall context.

DM27 – Built Heritage and Archaeology

A Development proposals which protect, conserve and where possible enhance the historic, cultural and architectural character of the Borough's historic sites and their settings will be supported. This will be particularly relevant in the case of:

A iii) Listed Building and Structures.

Referring back to the above point and the works the applicant has done to reinstate and restore the walled garden that was original to Drigg Hall in regard to enhancement.

Reiterating the previous points of the density of mature screening of the site to and from Drigg Hall, as demonstrated in the drawing / document USH.CS.122 PL10. The reality of the proposals is that there will be no harm to the setting of Drigg Hall by virtue of not being able to see the proposed development, in the sense of it being visually impactful, to Drigg Hall.

There has been modern additions to the adjacent farm, significant in scale agricultural sheds, that are within the setting of Drigg Hall.

Drigg Hall itself has a swimming pool within its grounds, which has to be seen as within the setting of Drigg Hall.

The applicant has had approved under planning large alterations to Partfield House with no consultation responses that I have seen, as the agent, from conservation officer. If no response received, or if received supported, then due to its much closer proximity to Drigg Hall than the proposed development has not caused harm to the setting of Drigg Hall, as it has been approved. Therefore the proposed development being further away, it cannot be deemed to cause harm to the setting of a listed building.

D i) respects the architectural and historic character of the building.

There is no impact to the architectural or historic character of the building as the development is outside of the listed Building curtilage.

iii) does not have an adverse effect on the setting or important views of the building.

See points above in regard to the screening of the site from Drigg Hall. The only view afforded of Drigg hall, where is setting can be related to its surroundings, is shown on USH.CS.1222.PL10 drawing which is a very narrow band width of a viewpoint which will not alter under the proposed development. The screening seen within this image is mature, dense and of significant scale with no proposals to alter this.

PUBLIC REPONSES.

I will not respond to each objection, however I have taken the general theme of objections and will respond to these. I see that the general concerns in regard to the development of the site are as follows.

NOISE & NUISANCE, POLLUTION.

This is an understandable reaction to such a development and as such it is normal to assume the worst case scenario. The applicant will undertake a strict management process which can be detailed if required. The main elements of this management is that the site is only open to pre-booked users, there will be a no 'walk in' policy. This will provide the opportunity for the applicant to advise and make aware users of the site what the rules are and that they have to be adhered to.

Cabins have been purposely restricted to one and two bedroomed cabins to reduce large parties to book in advance, which would potentially be the cause of nuisance. Cabins are spaced apart to help encourage single family units to use the site. it is intentional to provide minimal veranda amenity space to the cabins and to provide a gantry for access. This allows the ground to be planted with wildflowers and native planting and not be used for gatherings, and therefore promoting the idea of being in the amongst the wildlife and fauna. Not an atmosphere the applicant associated with any unsociable behavior.

Fires will not be permitted.

I can not think what the concern re pollution would be.

It should be noted that the applicant will live adjacent to the site and will not allow any noise and/ or nuisance.

TRAFFIC / CONJESTION.

The initial planning application was withdrawn based on objections from Cumbria Highways and also the use of the bridleway for the exit.

Prior to the re-submission Cumbria Highways were consulted and their comments received and applied. We therefore assume that all considerations of the proposed development have been considered by Cumbria Highways taking in to account all relevant guidelines and history of the localized road network to the site.

For clarification drawing USH.CS.1222.PL1 shows the road width in varying location along the southern boundary of the site to show that the entry / exit point is at a wider element of the B5344.

The arrival and departure of site users will be managed by the applicant and planned to prevent, as much as is possible, staggered arrival and departure times so as to not cause any congestion. It is also unlikely that there will be a full capacity arrival and/or departure at a single time due to the nature of the users and varying periods of stay.

All site users will have to have pre-booked their stay and will be allocated a motorhome or parking bay to use and advised to park within the allocated bay before check in. This was supported by Cumbria Highways as a robust way to prevent congestion on the B5344 entry / exit point, along with the wider entrance to make entry / exit suitable for two motorhomes to pass taking account of vehicle tracking.

Cumbria highways had no objection to the amount of parking, which was 1 bay per cabin with two parking spaces allocated to the shop use. They also had no comment to make to the internal space for motorhomes and service vehicles to enter and leave the site in a forward gear.

Sight lines have been approved by Cumbria highways considering the traffic calming. Measures installed.

There is a national speed limit in place of 30mph, and whilst I appreciate some road users will not adhere to this, proposed developments must be considered on national guidelines and consultee with the local Highways Department. It maybe considered that the knowledge of a junction ahead may serve to slow traffic down in anticipation of vehicles entering and exiting site.

In regard to service vehicles for the site. It is anticipated Shop supplies will be sourced mainly from cash & carry, fresh produce I.e.milk/eggs will be sourced locally and delivered to site at the same time as delivery to local residents. Treatment plants serviced annually, and refuse collected fortnightly.

WILDLIFE / TREES

It should be clarified that there has been no felling of tree by the applicant since purchasing the site. the forestry commission investigation found that the work reported was the clearing fallen trees and damaged branches and have at no time felled any actual trees.

Comments of building work undertaken are false. Spoil from the Partfield House extension works was deposit within the woodland to infill dips within the ground.

The submitted design and access statement, along with responses within this document outline the work undertaken to promote the visiting wildlife to continue and hopefully improve the situation.

By way of an update on wildlife. Bat boxes are in use, Bird boxes have been used, Foxes come to site (photos available), Re-introduction of ducks on the restored pond as well as frogs, heron and dragonflies returning.

The applicant is attending hedge laying course, and tree maintenance course. This way the land can be managed routinely and sustainably by the applicant. The applicant has already laid and planted the hedgerow where gaps did exist.

DRAINAGE / SURFACE

All hard standing within the proposed development will be permeable and not generate surface water run-off. The proposed cabins will only generate as much surface water as the floor area that they sit on, therefore there would be no increase in surface water.

The proposed waste drainage system has been developed and will be installed with a UU approved contractor, and will therefore be in line with all relevant guidance, policy and meet and Building regulation Approved Documents. It has been requested by United Utilities that a full drainage design is to be submitted as a condition of approval. This was expected and will be undertaken.

SITE SHOP.

Offering an amenity to the village was thought to be beneficial to the village. It was thought likely that travelling of villages to shops within the neighbouring villages could be inconvenient for small one-off items, such as running out of milk for example.

Suggesting that local shops would suffer is short sighted and promotes short car journey's, which is something I believe local authorities are looking to dissuade people from undertaking.

If Drigg Villagers feel strongly that nearby shops would lose out on business because of the site shop they do have the option to continue supporting shops in other villages.

GENERAL COMMENTS OF NOTE.

Housing development – there was a suggestion of the site being used for housing for local elderly or young people. This would cause significantly more harm to the villagers and residents to the immediate area.

Underhandedness - This was in regard to the withdrawal, recommended by the Planning Case officer, and re-submission of the application, which was done in a timescale of being able to consult and take on board the highways comments, which was the reasoning for the withdrawal.