

Planning Statement – Land at How Bank Farm & former Orgill Junior School, Egremont

Proposal: Full Planning Application for residential development consisting of 114 dwellings



Applicant:

**homes by
gleeson**
builders for generations

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1.0 Introduction

- 1.1 This planning statement has been prepared on behalf of Gleeson Homes Ltd in support of a planning application for residential development on land at How Bank Farm and the former Orgill Juniors School, Egremont.
- 1.2 The application is submitted in full and therefore seeking approval for all matters - access, appearance, landscaping, layout and scale. The purpose of this statement is to set out the planning case in support of the development of the site, and it should be read in conjunction with the plans and other supporting documentation listed below:
- A suite of architectural drawings;
 - Design and Access Statement;
 - Detailed landscape Layout;
 - Ecology Appraisal;
 - Ground Investigation Report;
 - Economic Benefits Appraisal;
 - Landscape and Visual Impact Assessment;
 - Flood Risk Assessment and Drainage Strategy;
 - Arboricultural Impact Assessment;
 - Transport Assessment.
- 1.3 Section 2 of this Statement will set out the site's context, Section 3 covers the proposed development, Section 4 relates to the planning history of the site and surroundings, Section 5 will set out the planning policy context against which the application must be considered and undertakes a planning assessment of the proposed development, and Section 6 will draw together the conclusions.

2.0 The Site

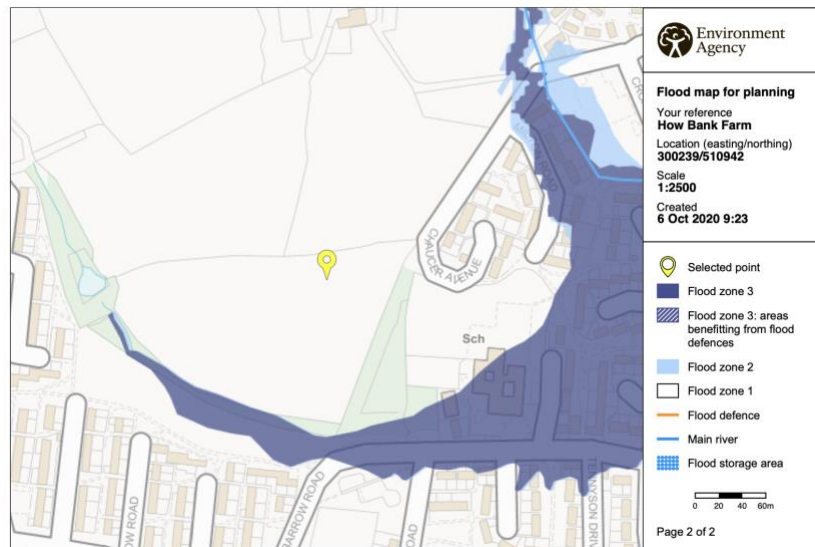
- 2.1 The application relates to two areas of land. The first is an area of agricultural land extending to 4.15 hectares which lies to the northwest of the Egremont settlement, adjacent to the residential area known as Orgill. It adjoins the residential properties on The Oaks, The Laurels, Baybarrow Road and Chaucer Avenue. It also has a shared boundary to the east with Orgill Primary School. The development site adjoins agricultural land further to the north, and again further to the north are the buildings and domestic properties at How Bank Farm.
- 2.2 The site is used for grazing animals whilst still in the current ownership. The topography of the land raises towards the northwest of this site. The field is generally open land, with only field boundary hedges and fences as existing features. There is a significant tree line outside of the southern site boundary, with the residential properties on The Larches, The Hollies, The Ferns and the Lilacs.
- 2.3 The second area of land is smaller in size and located 150m to the northeast of the How Bank Farm land, and is the site of the former Orgill Infants School. It is 0.64 hectares in size and is relatively flat. Some areas of hardstanding from the previous development on the site are site visible, with the rest being grassed land.
- 2.4 To the north it adjoins the Chaucer Road access for the residential properties, to the immediate west boundary it adjoins the rear curtilage of the dwellings on Milton Road, to

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the south it adjoins Dryden Way, and to the east it adjoins the road frontage of Croadalla Avenue, with residential properties on the eastern side of the road.

- 2.5 The areas of land within the application are situated within an established residential area and are close to local amenities including churches, post office, a library, dentists, doctors, pharmacies, butchers, a supermarket and a range of other shops within Egremont Town Centre. Egremont is the largest second tier settlement in the Borough of Copeland, classed as a Key Service Centre.
- 2.6 There is one Secondary School, West Lakes Academy, and several Primary Schools within close proximity to the site, including Bookwell Primary School, St Bridget's Catholic Primary School and Orgill Primary School, which is situated next to the How Bank Farm Site.
- 2.7 Orgill is situated 0.8km from the town centre of Egremont. It is also in fairly close proximity to Sellafield, the County's largest employer where 10,000 highly paid jobs are located.
- 2.8 The A595 which runs through Copeland can be joined 0.7km from the site and provides easy access to both Sellafield and Whitehaven and continues north towards Carlisle, and Millom to the south. The A595 links to the A66, 13 miles north of the site which connects to Penrith and Junction 40 of the M6 to the east.
- 2.9 In summary therefore, the site is situated within a long-established residential area that is within reach of a broad range of community facilities and which is also easily accessible both by public and private modes of transport.
- 2.10 There are no Conservation Areas, Listed Buildings or Tree Preservation Order's (TPO) on or directly adjacent to the sites. The nearest Listed Buildings are situated within the Main Street of Egremont (which is also a Conservation Area), some 0.8km to the east of the site.
- 2.11 The How Bank Farm site is primarily located in an area that the Environment Agency Flood Map for Planning has noted as Flood Zone 1, other than the point of access from Baybarrow Road, and as such have a low probability of flooding.
- 2.12 The former Orgill school site is primarily located in an area that the Environment Agency Flood Map for Planning has noted as Flood Zones 2 & 3, to the western area of the site. This issue is covered and addressed in the Flood Risk Assessment submitted as part of the planning application. A copy of the Environment Agency's Flood Map is included below.



3.0 The Proposed Development

- 3.1 The application is a full planning application covering matters relating to access, scale, layout, landscaping and appearance of the residential development proposed on both areas of land covered by the red line boundaries.
- 3.2 In terms of access, the proposed dwellings on the former Orgill Infant School site will have direct frontage onto Croadalla Avenue and Chaucer Avenue, with some dwellings served by private shared drives, which serve a maximum of five dwellings.
- 3.3 A new access is to be constructed from Baybarrow Road to serve the How Bank Farm development. The proposed road layout within this larger site will consist of a 5.5m wide carriageway with 1.8m wide footpath to both sides, reducing to a 1m footpath where there are no dwellings fronting on.
- 3.4 An emergency access and pedestrian link is proposed in the eastern corner of the site, connecting to Chaucer Avenue, in the location of the current field access.
- 3.5 The design of the proposed development has been explained in the supporting Design and Access Statement and this statement should be read in conjunction with that document. However, the specific design principles for the application sites are listed below:
 - o To design a layout which takes into careful consideration the topography of the site, and which eliminates the need for excessive and unsightly retaining walls throughout the larger site.
 - o To take advantage of elevated views towards the east in careful orientation of proposed dwellings.
 - o To utilise undevelopable areas within the site for surface water attenuation and to create areas of public open space.
 - o To retain existing trees and hedgerow where possible.
 - o Utilise existing access to form pedestrian and emergency link.

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- o Increase depth of rear gardens to accommodate levels where applicable.
- o Observe location and easement to newly constructed culvert.
- o To seek a sustainable pattern of development providing a balanced mix of house types appropriate to the location that responds to local needs.
- o To provide a layout which incorporates continuity of street frontages and enclosure of spaces.
- o To ensure a safe, healthy and secure environment for both people and property.
- o To create interesting and varied street scenes by the use of a range of house designs varying in size and shape.
- o To ensure that all public spaces are adequately overlooked. o Provisional of suitable drainage solutions to both sites.

3.6 The proposed scale of the development is 114 dwellings on the two areas of land.

It is proposed that the How Bank Farm site provide a total of 97 dwellings comprising:

- 12 x 2-bedroom dwellings;
- 63 x 3-bedroom dwellings; and,
- 22 x 4-bedroom dwellings.

Meanwhile, the former Orgill School site will provide a total of 17 dwellings, all of which will be 3-bedroom dwellings.

- 3.7 All of the proposed dwellings will be 2 storey in height, existing properties adjacent to site are predominantly 2 storey.
- 3.8 The proposed dwellings will be of a traditional brick and tiled roof construction. They will utilise dormers and gables within the roof pattern to create a varied roofscape and be articulated with good quality detailing. A robust material palette is proposed, consisting of Forterra Abbey Red Multi as the main brick, contrasted with Forterra Ashwell Yellow Multi, and vice- versa.
- 3.9 Detailed landscape proposals are submitted in support of this application. Existing trees and hedgerow to How Bank Farm are to be retained where possible. Individual residential units are to receive landscaping treatment to soften edges of residential areas and public highway. Rear gardens and private amenity spaces will be enclosed with a 1.8m high timber fence, as shown on the site layout plan.
- 3.10 Each proposed residential dwelling will provide off-street car parking provision on private driveways with a minimum of two parking spaces per dwelling. The highway authority's guidelines require 1 visitor space per 5 dwellings. Therefore, the How Bank Farm site should provide 20 visitors spaces and the former Orgill School site should provide 4 visitor spaces.
- 3.11 The How Bank Farm site will provide 15 visitors spaces spread throughout the site. While this is slightly below the Council's parking requirements, the How Bank Farm site will provide

a 5.5 metre carriageway width which is sufficient to allow two light vehicles, or a light and heavy vehicle (e.g. a refuse vehicle) to pass safely. On this basis and given how lightly trafficked the proposed development access road will be, it is considered appropriate for some visitors to the development to park on-street.

- 3.12 The former Orgill School site will provide 4 visitor spaces in accordance with the Councils parking requirements. Parking on-street will be actively discouraged within this site due to the shared surface nature of the roads within the development.
- 3.13 The proposed configuration of the development is shown on the site layout plan. The proposed layout has been informed by the site's constraints and opportunities.
- 3.14 Both areas of land are considered well related to the existing residential developments to the east and south, the road network and it is considered that the development of the sites in the proposed form is possible without having any adverse impact on residential amenity to the surrounding properties.

4.0 Planning history

How Bank Farm:

- 4.1 A previous planning application for flood storage areas on a small area of the site was approved in 2019 by Copeland Borough Council:
 - 4/19/2044/0F1 – Creation of three flood storage areas, landscaping and associated works – Land at How Bank Farm, Whangs Beck, Falcon Club, West Lakes Academy and West of Croadalla – Approved
- 4.2 No other planning applications have previously been submitted on the application site.

Former Orgill School:

- 4.3 The above previous planning application for flood storage areas also covered part of the site was approved in 2019 by Copeland Borough Council:
 - 4/19/2044/0F1 – Creation of three flood storage areas, landscaping and associated works – Land at How Bank Farm, Whangs Beck, Falcon Club, West Lakes Academy and West of Croadalla – Approved
- 4.4 The following application for residential development on the site was submitted in 2016 but withdrawn prior to a decision:
 - 4/16/2121/001 – outline application for construction of 27 dwellings and 5 detached garages – Former Orgill School Site, Croadalla Avenue, Egremont – Withdrawn

5.0 Planning Policy and its application to the proposed development

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- 5.1 Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The Local Development Plan consists of policies within the Core Strategy and Development Management Policies DPD (December 2013). The policies in the following paragraphs are considered relevant to the proposed development.
- 5.3 The Local Plan sets out a long-term spatial vision and strategic objectives to support Copeland's vision which is "Working to improve lives, communities and the prosperity of Copeland". Although it was adopted before the updated NPPF (2019) it was adopted after the first NPPF that was published in March 2012 and therefore closely follows the principles of sustainable development, as defined by national policy and delivering sustainable housing in accordance with that policy.
- 5.4 As of the 9th May 2017, Copeland Borough Council announced that it cannot demonstrate a five-year supply of housing sites, with a supply of 2.3 years. Policies for the supply of housing set out within the Copeland Local Plan 2013 – 2028 (Core Strategy and Development Management Policies) will no longer be deemed up-to-date; and these policies carry less than full weight in decision-making. As an update to this, in a recent Planning Appeal decision, the Planning Inspector stated that Copeland could at this point demonstrate a 3.2 year supply of housing sites, and therefore there is still not a five-year land supply in place and as such the Local Plan Policies continue to carry less weight. For reasons of clarity however, the Planning Policy section of this document included Policy text from the National Planning Policy Framework (NPPF as amended 2019), Copeland Local Plan, and the Copeland Borough Council Interim Housing Policy, which was created following the May 2017 statement regarding land supply.

Strategic Policies

- 5.5 **Policy ST1** of the core strategy sets out the fundamental principles that will achieve sustainable development. Amongst other things it seeks to ensure that development created a residential offer which meets the needs and aspirations of the Boroughs housing markets and is focussed on previously developed land away from greenfield sites.
- 5.6 **Policy ST2** sets a spatial development strategy whereby development should be guided to the Principal settlement and other centres and sustain rural services and facilities.
- 5.7 The above are the strategic policies with particular relevance to residential housing sites, and the principle of this development fits with the strategic aims of the Local Plan. The former Orgill School site is within the settlement boundary and previously developed, and the How Bank Farm land has previously been considered suitable for residential development in the Copeland Borough Council Site Assessment Preferred Options document of January 2015.
- 5.8 **Policy SS1** seeks to improve the housing offer of the borough by, amongst other things, by allocating housing sites to meet local needs in locations attractive to house builders and enhancing the general surrounding residential environment of the borough.
- 5.9 With regards to the above, it is noted that the site is within the vicinity of a number of residential properties. The proposed residential development will have minimal impact on

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local amenity and improve the borough's housing stock in this location, which has seen minimal new residential development over the past 10 years, compared to Cleator Moor and Whitehaven.

The Council abandoned progress on the above housing allocation document to commence from the start again, with the lack of housing land supply being acknowledged, but this was intended to build on the Local Plan and Policy SS1 to identify sites that: -

- Met the needs of the Local Plan and the NPPF (2012);
- Provided sustainable development;
- Help to meet the needs of Copeland and provide a sound basis for economic growth.

While never reaching allocation status, it is considered that that site meets the above, and was under consideration as a housing allocation in 2015.

Furthermore, residential development is directed towards Egremont as one of Copeland's Key Service Centres. The former Orgill School site is within the town's settlement boundary and the How Bank Farm land is adjacent to the settlement boundary. Therefore, the principle of residential development is supported by both the NPPF and the Local Plan.

5.10 **Policy SS2** seeks to achieve sustainable housing growth by focusing new housing development within accessible location to meet the needs of the community. It will allocate sufficient land for new housing development; it will allocate this at a baseline of 230 dwellings per year and will seek densities of over 30 dwellings per hectare.

5.11 The preamble to Policy SS2 explains the purpose of the policy by stating: -

'The sustainable approach is to allocate sites for housing development in accessible locations, to set realistic annual housing supply targets and to optimise development densities (para 5.3.1 Local Plan)'.

5.12 The proposed development in this application in terms of both areas of land is considered compliant with the above. The land is in an accessible location given the edge of Egremont positioning, and reaches an appropriate density in the context of the adjacent housing and the site constraints.

5.13 **Policy SS3** requires housing development proposals to demonstrate how the proposal helps to deliver a range and choice of good quality and affordable homes for everyone. This is assessed by how well a proposal meets the identified needs and aspirations of the Borough's individual Housing Market Areas as set out in the Strategic Housing Market Assessment (SHMA). The aim of the policy is therefore to: -

- Create a more balanced mix of housing types and tenure within that market area, in line with the evidence provided in the SHMA
- Include a proportion of affordable housing which makes the maximum contribution (consistent with maintaining the viability of the development) to meeting identified needs in that market area.

5.14 The development proposes a varied and complementary mix of the different house types from the Gleeson Homes range, in the form of 2, 3- and 4-bedroom dwellings with variations

in number of bedrooms and plot sizes. Private amenity space within each residential curtilage is commensurate to the size of each dwelling and the character of the area. The development will therefore meet a range of housing needs and aspirations.

- 5.15 Therefore, it is evident that the proposed housing mix wholly accords with the policies set out in the Copeland Local Plan.
- 5.16 **Policy SS5** sets out the Councils position in relation to the provision and access to open space and green infrastructure. This aims to protect against the loss of designated open space, set the minimum open space standards for new development and promote the establishment, improvement and protection of green infrastructure.
- 5.17 The proposed development has been designed with this in mind and in accordance with the Policy provides significant areas of open space including the Suds areas within the site and retains the tree belt to the southern boundary of the How Bank Farm land, and also specifies additional tree planting within both sites.
- 5.18 **Policy ENV1** sets out an approach to ensure that new build development is not prejudiced by flood risk, by permitting new build on sites outside areas at risk of flooding and ensuring that new development does not contribute to increased surface water run-off through measures such as Sustainable Drainage Systems.
- 5.19 The application as submitted is accompanied by Flood Risk Assessment documents, specific to both areas of land within the application, which provides the basis for the development with regards to flood risk and the justification regarding meeting the above policy. It should be noted that there are significant areas of Suds within both areas of land.
- 5.20 **Policy ENV3** seek to ensure that new development will protect and enhance biodiversity and geodiversity.
- 5.21 A preliminary Ecological Appraisal of the site was carried out to assess the potential for species and habitats of note or importance, and to recommend mitigation measures where appropriate as part of the planning application. No further surveys are required following this initial appraisal.

Development Management Policies

Design

- 5.22 **Policy DM10** states the Council will expect high standard of design and the fostering of 'quality places' and development proposals will be required to: -
- Respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through an appropriate size and arrangement of development plots, the appropriate scale and massing of houses;
 - Incorporate existing features of interest including local vernacular styles and building materials;
 - Address vulnerability to and fear of crime and anti-social behaviour by ensuring that the design, location and layout of all new development creates clear distinctions

between public and private spaces, overlooked routes and spaces within and on the edges of development;

- Create and maintain reasonable standards of general amenity.

5.23 The design principles for the proposed development set by the developer and the architect were as follows:

- To design a layout which takes into careful consideration the topography of the site, and which eliminates the need for excessive and unsightly retaining walls throughout the larger site.
- To take advantage of elevated views towards the east in careful orientation of proposed dwellings.
- To utilise undevelopable areas within the site for surface water attenuation and to create areas of public open space.
- To retain existing trees and hedgerow where possible.
- Utilise existing access to form pedestrian and emergency link.
- Increase depth of rear gardens to accommodate levels where applicable.
- Observe location and easement to newly constructed culvert.
- To seek a sustainable pattern of development providing a balanced mix of house types appropriate to the location that responds to local needs.
- To provide a layout which incorporates continuity of street frontages and enclosure of spaces.
- To ensure a safe, healthy and secure environment for both people and property.
- To create interesting and varied street scenes by the use of a range of house designs varying in size and shape.
- To ensure that all public spaces are adequately overlooked. o Provisional of suitable drainage solutions to both sites.

5.24 It is considered that the above principles have been taken into account in the design and layout of the proposed development, and meet the criteria listed in Policy DM10.

Residential Amenity

5.25 **Policy DM12** requires new build residential properties to have: -

- a separation distance of at least 21 metres between directly facing elevations of dwellings containing windows of habitable rooms
- a separation of at least 12 metres between directly facing elevations of dwellings containing windows of habitable rooms and a gable or windowless elevation

5.26 The site has been designed to comply with the above separation distance between both proposed and existing properties.

- 5.27 A comprehensive Design and Access Statement has been produced that suitably explains the proposed design of the development in greater detail.

Drainage and Flood Risk

- 5.28 **Policy DM24** states where a proposed development is likely to be at risk from flooding or increases risk of flooding elsewhere, a Flood Risk Assessment (FRA) will be required to be submitted as part of the planning application. Development will not be permitted where it is found that there is an unacceptable risk of flooding; or the development would increase the risk of flooding elsewhere.
- 5.29 As mentioned above, the application as submitted is accompanied by Flood Risk Assessment documents, specific to both areas of land within the application, which provides the basis for the development with regards to flood risk and the justification regarding meeting the above policy.

Access and Transport

- 5.30 **Policy DM12** requires housing development to provide a car parking provision in accordance with adopted residential parking standards. Cumbria Highways have provided a Cumbria Development Design Guide but there are no adopted parking standards. The guidance provides a suggested level of parking for housing development.
- 5.31 The proposed layout details each proposed residential dwelling will provide off-street car parking provision on private driveways with a minimum of two parking spaces per dwelling. It is therefore considered that the proposed layout meets this criterion of Policy DM12.
- 5.32 **Policy DM22** requires development proposals to be accessible to all users by providing convenient access into and through the site for pedestrians, cyclists and disabled people, access for emergency and service vehicles, meeting adopted car parking standards which reflect the needs of the Borough in its rural context. Where necessary the potential transport implications of development will be required to be supported by a Transport Assessment and a Travel Plan to manage any significant transport implications.
- 5.33 The proposed development provides a safe, functional, permeable and inclusive access that does not give dominance to car use. The internal road network has been designed to encourage low vehicle speeds, thus creating a pedestrian and cycle friendly environment. The proposed layout features a short section of 'shared surface' for access to some of the properties in the centre of the site. These sections will be 4.8 metres wide. On the larger How Bank area of the site an emergency access from Chaucer Avenue is also included. As mentioned above, the application is significant and is therefore supported by a Transport Assessment, including a Travel Plan. The proposal therefore meets the aims of local plan policy DM22.

Ecology and Trees

- 5.34 **Policy DM25** states that all development proposals should protect the biodiversity value of land and buildings minimise fragmentation of habitats. A preliminary Ecological Appraisal was carried out to assess the impact of the proposed development on biodiversity and it was

found that no further survey work was required in relation to the areas of land in the application.

- 5.35 **Policy DM28** requires development proposals which are likely to affect any trees within the Borough will be required to include an arboricultural assessment as to whether any of those trees are worthy of retention and protection by means of a Tree Preservation Order. A Tree Survey has been carried out for both areas of land, and this covers that no trees or hedgerows of high quality will be lost by the proposed development. It is therefore concluded that DM28 has been complied with.

Principle – National Planning Policy Framework (“NPPF”) (as revised February 2019)

- 5.36 The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF states that sustainable development has three objectives social, economic and environmental.

- 5.37 The social and economic are as follows:

*“a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. “*

It is noted in the above that a central aim of the NPPF is to ensure that the right type of land is available in the right areas, to ensure that the correct housing is available to meet the needs of present generations. As mentioned elsewhere in this document, this area has seen considerably less growth than the other major settlements of Whitehaven and Cleator Moor, and little development in recent years. A residential development scheme of this size and nature will help to address this imbalance within Copeland.

- 5.38 Paragraph 11 covers the issue of the application of the presumption in favour of sustainable development.

*“For **decision-taking** this means:*

Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 5.39 Paragraph 49 in the revised NPPF now states “in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission.”
- 5.40 Paragraph 61 states that *“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”*
- 5.41 At present, Copeland Borough Council is unable to demonstrate a five-year supply of housing land. Paragraph 67 of the NPPF states that Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- Therefore, housing applications should be considered in the context of sustainable development and relevant policies for the supply of housing are considered to be out-of-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 5.42 Paragraph 102 is regarding promoting sustainable transport, which is relevant to this proposal. *“Opportunities to promote walking, cycling and public transport use are identified and pursued.”* This continues in paragraph 103 stating *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”* As previously noted, this site is located on the edge of the Egremont settlement boundary, providing a logical extension to this. This position is supported by the previously proposed allocation of the How Bank Farm land for residential development. The town’s full range of services will benefit from the additional housing and the location also provides the homeowners with a sustainable method of travelling to Whitehaven/Cleator Moor/Sellafield via public transport, which are the other large settlements in the borough, and the main employment site.
- 5.43 Ultimately when assessing the proposal there is a need to balance any harm caused by the proposed development with the contribution to the supply of housing, and the provision of housing which will meet the needs of the local demographic. The contribution to the supply of housing would be relatively significant in terms of overall numbers, especially measured against the identified need and significant shortfall in housing supply, which Copeland currently has, with specific reference to the recent lack of housing delivery in Egremont. The

sustainability of the site is not in question given the edge of settlement boundary location and previous proposed allocation of part, and previously developed nature of the other area of land. It is therefore considered that the principle of development is in accordance with national policy on the supply of housing.

Copeland Borough Council's Interim Housing Policy (2017)

- 5.44 Copeland Borough Council's Interim Housing Policy (2017) sets out the Council's current approach to determining planning applications for residential development in the absence of a 5-year supply of housing and up-to-date policies relating to housing in a Local Plan. This states that:

"The Council will continue to support applications that are in accordance with the development plan. However, in order to encourage sustainable development and boost housing delivery, a decision-making framework for planning applications that may not be fully in accordance with the development plan has been set out.

The Council will (in addition to the development plan and other material considerations) consider residential development proposals contiguous to the development boundary, or the existing built form of a settlement, against each of the following criteria:

- A. The scale of proposed development must be appropriate to the size, character and role of the settlement. In deciding whether the scale is appropriate, account will be taken of the cumulative impact of completions and permissions for the settlement concerned;
- B. The level of services and facilities in the settlement, as defined in the Village Services Survey (2017). To encourage sustainable development, preference will be given to schemes which are contiguous to settlements that have the greatest concentration of facilities and services. Information provided by applicants which seeks to update the survey will be a material consideration;
- C. Proposed development should not have a significant adverse impact on the capacity and safety of the highway network;
- D. Proposed development should create safe and accessible environments that offer good access via a range of transport modes. Sites where it is possible to walk easily to a range of facilities will be considered more sustainable than sites that are further away and which would make car journeys more likely;
- E. Proposed development sites that fall within Flood Risk Zone 3a and 3b, as defined by Environment Agency's latest data, will be discounted unless robust evidence can prove that the flood zoning for the site is incorrect, or that there is a robust mitigation plan signed off by the Environment Agency;
- F. Proposed development should not have an adverse impact on the Lake District National Park, and should demonstrate how they conserve or enhance the natural beauty, wildlife and cultural heritage of the Lake District National Park, or its setting;

G. Proposed development should, subject to viability, include a proportion of affordable housing which makes the maximum contribution to meeting identified needs in that market area;

H. Proposed development for Executive Housing will be supported where it delivers significant and demonstrable economic, social, and environmental benefits;

I. Proposed development should be of a high-quality design, enhancing local distinctiveness; and, where relevant, respecting the rural character of the settlement;

J. Proposed development should not result in significant intrusion into the open countryside, or result in any settlements merging;

K. Proposed development should not result in significant and demonstrable harm to the landscape character of Copeland, and applicants should have regard to those landscape areas as defined in the Cumbria Landscape Guidance and Toolkit (2011), or any subsequent update;

L. Major developments should be supported by a masterplan (to include a phasing scheme), which will demonstrate what proportion of development will be deliverable within the five-year supply period relevant to the date of determination of the planning application.

5.45 It is considered that the Interim Housing Policy has been met by the proposal, and this is covered below.

5.46 Criteria A and B of the Interim Housing Policy (2017) refer to the scale of proposed development must be appropriate to the size, character and role of the settlement, and in order to encourage sustainable development, preference will be given to schemes which are contiguous to settlements that have the greatest concentration of facilities and services.

5.47 In this context it is considered that the scale and character of the proposal is appropriate and would enhance the housing market of Egremont. Egremont is classed within the current Local Plan as a Key Service Centre, being a town which benefits from a number of key facilities, including a secondary school. It is also the second largest settlement in the Borough and has notably been subject to less residential development in recent years than Whitehaven and Cleator Moor.

The proposal therefore complies with criteria A and B.

5.48 In terms of criteria C and D of the Interim Housing Policy (2017), the submitted application will not cause any significant traffic issues within the locality from the development, as confirmed in the transport assessment. As stated above the proposed development site is located within walking distance of the town centre facilities and services found in Egremont. Therefore, it is concluded that the application meets the criteria of points C & D.

5.49 In terms of criterion E of the Interim Housing Policy (2017), the application is accompanied by a comprehensive Flood Risk assessment covering both area of land in the application.

5.50 Criterion F is not relevant to the proposal given the distance from the site to the Lake District National Park, and the surrounding development and trees ensure that there is very little long-range visibility of the site.

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- 5.51 Criterion G is considered to be met by the planning application, which proposed a 10% affordable housing contribution of the development, which is in accordance with the requirement of the affordable housing policy in the Copeland Borough Council Preferred Options Draft of September 2020.
- 5.52 Additional dwellings are required in the Copeland area in order to provide a choice for employees, especially those working at Sellafield and other high value employment locations, mainly relating to the nuclear industry. The proposed development would help to support delivery of these types of dwellings and would reduce the pressure for housing outside of the Borough, and the consequential need for potential occupiers to travel long distances. There would also be other economic benefits arising from the new occupiers purchasing goods and services locally in the Egremont town centre rather than also being lost to other areas. The application site is a suitable location for housing in Copeland and the housebuilder intends to utilise a variety of house units. The proposal would therefore satisfy criterion H as it would deliver significant and demonstrable economic, social and environmental benefits. This is evidenced in the economic benefits report with the application.
- 5.53 With regards to Criterion I, as previously detailed, this is a well-designed site with a density appropriate to a housing site on the edge of a major town in Copeland. It is therefore considered to comply with Criterion I.
- 5.54 In terms of criterion J the proposed development is partly situated adjacent to existing residential developments on two sides, forming a natural location for additional residential development, and the second area of land adjoins existing residential development on all sides. The proposed development will therefore not result in an intrusion into the open countryside, and is in accordance with Criterion J.
- 5.55 In considering the scale of the scheme and its impact upon the landscape, consideration has been given to the Cumbria Landscape Character Guidance and Toolkit (CLCGT) which provides the most up-to-date landscape character assessment. The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) which demonstrates how the development fits into its surroundings. Therefore, the application meets the text of Criterion K.
- 5.56 Gleeson Homes are currently developing a number of sites within the Cumbrian region are entirely committed to delivering new homes in the area. Their first development in Copeland is nearly underway, and it is hoped that they will be bringing more sites forward in the Borough in the near future. Given their ambitious housebuilding targets, it is expected that all of the proposed dwellings will be built and occupied within a five-year period, therefore meeting the aims of Criterion L.

In the context of the above matters, it is clear that the proposed development entirely conforms with the requirements of the Copeland Interim Housing Policy.

6.0 Conclusion

- 6.1 The proposed development provides the opportunity to deliver a housing scheme on a site that the Council has previously considered as suitable for residential use, and a previously developed site within the settlement boundary.
- 6.2 It is clear that the development accords with the relevant Local Plan and National Planning policies regarding housing delivery.
- 6.3 Recent housing delivery in the settlement has been minimal and this application will substantially help to address this issue.
- 6.4 The proposed development has been sensitively designed to take into account the site characteristics, surroundings, wider location and density.
- 6.5 It is considered that any impact on the adjacent dwellings outside of the site has been minimised by the proposed layout.
- 6.6 It is contended therefore that the proposed development is acceptable and is in accordance with both national and local planning policy, and therefore should be approved.

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