

**Pre-Application Planning Statement – Land adjacent to Round Close
Park, Whitehaven**

Proposal: Residential Development



Mr Graeme Morgan

Sunshine Properties West Coast Limited

December 2021

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1.0 Introduction

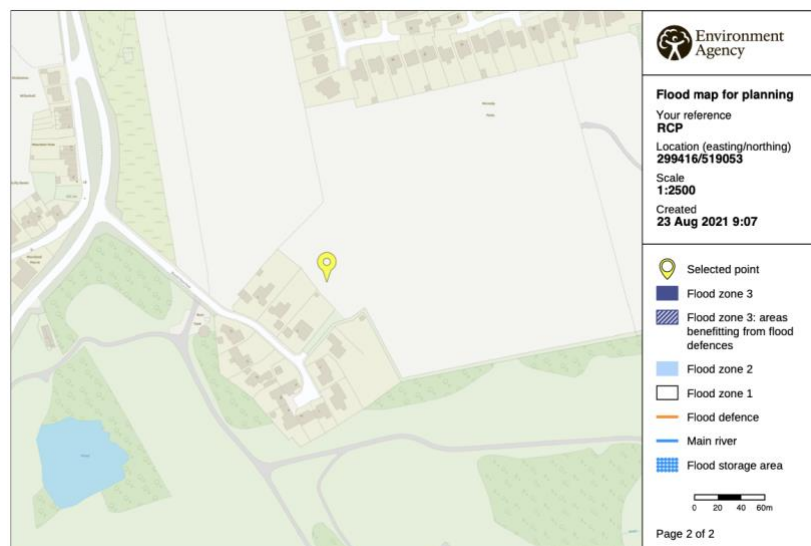
- 1.1 This planning statement has been prepared on behalf of the applicant in support of a pre-application enquiry for residential development on land adjacent to Round Close Park, Whitehaven.
- 1.2 The purpose of this statement is to set out the planning case in support of the development of the site, and it should be read in conjunction with the plan submitted.
- 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, Section 6 will draw together the conclusions.

2.0 The Site

- 2.1 The application related to an area of agricultural land extending to 0.96 hectares which lies to the east of the existing dwellings at Round Close Park . The development adjoins further agricultural land to the north and east, to the south it adjoins the boundary of Whitehaven Golf Club.
- 2.2 The topography of the land falls towards the east of this site and it is contained by hedgerows to the field boundaries, and more domestic boundaries to the adjacent properties in Round Close Park.
- 2.3 The application site is situated adjacent to an established residential group of 14 dwellings. It is located close to the Whitehaven settlement boundary (600m away) and is therefore close to the local amenities in the Hensingham area of Whitehaven consisting of the West Cumberland Hospital, Hensingham Primary School, churches, playpark, pubs, library, and shops. Whitehaven is the Main Service Centre in the Borough as detailed in the Copeland Local Plan. It is also 200m directly away from the Moresby Parks settlement boundary, with a public footpath link from the site to the village.
- 2.4 The A595 which runs through Copeland can be joined 1km from the site and provides easy access to both Sellafield and Whitehaven and continues north towards Carlisle, and Egremont and Sellafield 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.
- 2.5 In summary therefore, the site is situated within a long-established residential area that is within reach of the best range of facilities that the Borough can offer.
- 2.6 There are no Conservation Areas or Tree Preservation Order's on or directly adjacent to the site.
- 2.7 There are also no Listed Building's on, or near to the site, as detailed below:



- 2.8 The site is located in an area that the Environment Agency Flood Map for Planning has noted as Flood Zone 1, and as such have a low probability of flooding. A copy of the Environment Agency's Flood Map is included below.



3.0 The Proposed Development

- 3.1 The proposed dwellings would utilise the access from Round Close Park which currently serves the existing 14 dwellings. There is an existing section of road leading to field from Round Close Park, which is also the existing footpath.
- 3.2 The proposed scale of the development is 9 dwellings on the site, which following the layout and size of dwelling/plot in the existing development.
- 3.3 The layout of the proposed development would follow the existing rear boundary to the adjacent dwellings within Round Close Park, mostly having front and rear elevation to the east and west elevations, with garden land to the west and access, parking and turning area to the east.

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- 3.4 The properties will have a minimum of two in curtilage parking spaces, although each plot could accommodate more parking for cars. The dwellings in the existing group include a range of detached, attached, single storey and two storey.
- 3.5 The application site is considered well related to the existing residential development, the road network and it is considered that the development of the site in the proposed form is possible without having any adverse impact on residential amenity to the surrounding properties, given the large plots, layout and potential separation in between dwellings.

4.0 Planning history

- 4.1 There are no previous planning history directly on the application site.
- 4.2 The following applications near to the application site are considered relevant to the proposal:
- 4/91/0161/0 – 12 Dwellings – Round Close Farm, Whitehaven – Approved
 - 4/19/2433/0 – Outline application (with all matters reserved) for single dwelling – land adjacent to Cross Barn, Sneakeat Road, Whitehaven – Approved
 - 4/17/2169/0F1 - Erection of two detached 4 bedroomed bungalows (dormer) - Land Adjacent to Quaylan, Whelpside, Hensingham, Whitehaven - Approved
- 4.3 The first above application relates to the approval for the existing dwellings at Round Close Park, and the following two applications are examples of recent planning approvals in the Borough, on the edge of Whitehaven but not adjoining the previous settlement boundary, that have received approval.

5.0 Planning Policy and its application to the proposed development

- 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 Copeland Borough Council's most recent 5-year land supply position statement which concluded that there currently is a 6.35 year housing land supply, following 3 years of sub-5 year supply. This updated position has led to the removal of the Interim Housing Policy, which had been in place since 2017 as Copeland's primary decision-making document.
- 5.5 The settlement boundaries currently forming part of the Copeland Local Plan however have not been reviewed or updated in many years (referenced verbally in a Copeland Borough

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Council Planning Panel meeting as reviewed in 2004). This position is confirmed in the Housing Land Supply position document which states:

'As the Council is now able to demonstrate a 5 year supply of deliverable housing sites, the Interim Housing Policy has been revoked. As the policy in the Core Strategy relating to development boundaries (Policy ST2 B and C) is still out of date, albeit for a different reason, applications for development outside the settlement boundaries in the Core Strategy will be determined in accordance with the National Planning Policy Framework, other policies relevant to the proposal and relevant material considerations.'

The explanation to the above is detailed as:

'These parts of the policy are considered to be out of date as the Preferred Options Draft of the Local Plan indicates that in order to meet housing needs identified in the SHMA over the period 2017-2035 (140 dwellings per year), development will be required outside the settlement boundaries in the Core strategy. Given this, the policy does not accord with the NPPF which requires local authorities to significantly boost housing delivery.'

Strategic Policies

- 5.6 **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 markers and is focussed on previously developed land away from greenfield sites.
- 5.7 **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. As detailed above however, this policy that relates to the settlement boundaries is considered out of date until such time that the settlement boundaries are fully reviewed and adopted in a new Local Plan document.
- 5.8 The above are the strategic policies with particular relevance to residential housing sites.
- 5.9 **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.
- 5.10 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 could be built to a high standard to match the existing dwellings, will have minimal impact on local amenity and improve the borough's housing stock in this desirable residential location.

The Council abandoned progress on a previous housing allocations document when the lack of housing land supply was 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.

It is considered that that site meets the above, given the location on the edge of a town, adjoining other dwellings and being a desirable location for new residential development of an appropriate scale.

Furthermore, residential development is directed towards Whitehaven as Copeland's Principal Settlement. The site is near to the town and therefore the principle of residential development can be supported by both the NPPF and the Local Plan.

- 5.11 **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
- 5.12 **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. There is a public footpath that joins Round Close Park to the Moresby settlement, some 200m to the east of the site. This will be protected and included in the proposed development, and the rest of the site is currently not public open space.
- 5.13 **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.
- 5.14 The proposed development is located within Flood Zone 1 which the Environment Agency (EA) define as an area having less than 0.1% annual risk of flooding and is therefore at the lowest risk of flooding. The site is therefore considered to be a low risk in terms of flooding.
- 5.15 **Policy ENV3** seek to ensure that new development will protect and enhance biodiversity and geodiversity.
- 5.16 There are no designations or information available which suggests that the site is subject to any biodiversity interest.
- 5.17 **Policy ENV5** relates to the protection and enhancement of the Boroughs landscapes. It seeks to ensure that landscapes are protected from inappropriate change through unsympathetic development.
- 5.18 It is considered that the proposed development, being of small scale and adjoining an existing cluster of dwellings, is not an inappropriate change to the landscape. In addition, the

proposed dwellings will be set at a slightly lower level to the existing properties to the south west, and will therefore form part of this cluster from longer range views.

Development Management Policies

Design

- 5.19 **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.
- 5.20 It is considered that the above principles can be taken into account in the design and layout of the proposed development. The proposed dwellings on the indicative layout are considered appropriate in form, design and size, and also the size is laid out at an appropriate scale for the site and context of the adjacent dwellings. Further details regarding the exact nature of the property would be addressed through a planning application, but at the density proposed, the layout would allow for some grassed areas and dwellings to be set back from the road frontage.

Residential Amenity

- 5.21 **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
- 5.22 The indicative layout confirms that the proposed dwellings would as detailed meet all of the above separation distances.

Drainage and Flood Risk

- 5.23 **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.
- 5.24 The development area is located within a Flood Zone 1 in which the NPPF recognises that all uses types are therefore appropriate. Surface water sewer systems are proposed to

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accommodate the 1:100 year event plus a 40% allowance for climate change in accordance with 2016 requirements.

- 5.25 The proposed dwellings would utilise the existing adopted foul sewer which runs through the existing properties at Round Close Park and across the application site towards Moresby Parks. The indicative layout submitted details that the foul and surface water infrastructure would be under the proposed road with the houses set around this to allow for minimal disruption.

Access and Transport

- 5.26 **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.
- 5.27 The size of the proposed site could accommodate sufficient parking for the dwellings. The indicative layout accounts for two spaces and an integral garage for the properties. It is therefore considered that any proposed layout can meet this criterion of Policy DM12.
- 5.28 **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.
- 5.29 The proposed development could provide a safe, functional, permeable and inclusive access allowing good sustainability to the facilities in the Hensingham area of Whitehaven (and the wider town in general) and allow sustainable transport links across the Borough. The application would propose to join the existing pavement at the entrance to Round Close Park to the nearest pavement at the Harras Moor road junction by way of agreement with Cumbria County Council. This stretch of road along the side of the Whitehaven Golf Course, does not currently have a marked footpath, but is well walked by Whitehaven residents. This proposed improvement would be a significant benefit to the local residents of Whitehaven.
- The proposal therefore would meet the aims of local plan policies DM12 and DM22.
- 5.30 The WYG document *How far do people walk* was issued in July 2015. The abstract to this provides a basis for the document, which details the previous information on acceptable walking distances. The abstract to the document states *'The information on walking distances is limited. Planning Policy Guidance 13 Transport, which gave some useful guidance on walking and cycling distances, was withdrawn in 2012. The IHT's Providing for Journeys on Foot and Planning for Public Transport in New Development were both published 15 years ago. In all three documents there is limited evidence to support the advice given. However, there is a clear need that policy and decision taking should be based on the best evidence available.'*
- 5.31 This concludes that the following distances should be used for planning purposes:

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	Mean (m)	85 th Percentile (m)
Walk – As main mode of travel		
UK (Excluding London)	1,150	1,950
London	1,000	1,600
Walk to a Bus Stop		
UK (Excluding London)	580	800
London	490	800

5.32 The proposed site is as follows:

- a 1.0km walk from a primary school;
- a 550m walk from a post office and shop;
- a 720m walk from a social club;
- 1.7km walk from a senior school;
- 70m from a bus stop;
- 550m from an alternative bus stop

5.33 The site is therefore considered to be a sustainable location, given that it fall within the above walking distances for access to schools, shops and public transport.

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.

5.35 **Policy DM28** requires development proposals which are likely to affect any trees within the Borough will be required to include an arboriculture assessment as to whether any of those trees are worthy of retention and protection by means of a Tree Preservation Order.

No trees will be removed on the site, and it is intended that the hedgerows on site would remain.

Principle – National Planning Policy Framework (“NPPF”) (as revised July 2021)

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;*

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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.

- 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 62 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 Paragraph 104 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 105 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.*"
- 5.42 As previously noted, this site is located on the edge of the principal settlement in the borough, within an existing group of dwellings. This area of Whitehaven benefits from services such as the West Cumberland Hospital, Westlakes Science Park, schools, churches, pubs & shops. The proposed footpath link as previously mentioned will help proposed safer and more sustainable transport in terms of the site, but also the wider area.

6.0 Conclusion

- 6.1 The proposed development provides the opportunity for additional dwellings on a site that is considered suitable for residential use.
- 6.2 The proposed development will provide the opportunity to provide a footpath link, which will benefit residents in this area of Whitehaven.
- 6.3 The proposed development has been sensitively designed to take into account the site characteristics, surroundings, wider location and separation distances.
- 6.4 It is considered that any impact on the adjacent dwellings outside of the site has been minimised by the proposed layout.
- 6.5 It is considered that the development is within a suitable walking distance to facilities and is therefore sustainable.
- 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.

Simon Blacker MRTPI