



Land at Harras Moor, Whitehaven

Homes England
June 2018

Planning Statement

Outline application for residential development of up to 370 houses with access, associated open space and infrastructure

Lakeland Business Park, Lamplugh Road, Cockermouth, CA13 0QT
Tel: +44 (0)1900 898 600 Fax: +44 (0)1900 826 324
Email: Website: www.wyg.com

WYG Environment Planning Transport Limited. Registered in England & Wales Number: 03050297
Registered Office: Arndale Court, Otley Road, Headingley, Leeds, LS6 2UJ



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1.0 Introduction

- 1.1 This Planning Statement has been prepared to support an Outline Planning Application for residential development of up to 370 houses with access, open space and associated infrastructure on land at Harras Moor, Whitehaven.
- 1.2 The application is made in outline with all matters, except access, reserved for later consideration.
- 1.3 Whilst being made in outline, an Illustrative Masterplan (A090070-410 004) accompanies this application which shows a development of around 370 houses (include a contribution of on-site affordable provision), access junctions, drainage scheme, boundary treatments, landscaping, footpaths and public open space on a greenfield site of around 23 hectares.
- 1.4 This Planning Statement provides a comprehensive summary of all relevant key information about the proposed development and assesses it in relation to relevant national and local planning policy and guidance.
- 1.5 In addition to this Planning Statement, the application is supported by the following documentation:
 - Application forms;
 - Site Location Plan (Drawing No:A090070 410 001 Rev B);
 - Illustrative Masterplan (Drawing No: A090070 003 Rev G);
 - Illustrative Layout (Drawing No: A090070 004 Rev B)
 - Illustrative Phasing Plan (Drawing No A090070-007);
 - Design and Access Statement;
 - Flood Risk and Drainage Assessment;
 - Ecological Assessment (Phase 1);
 - Transport Assessment;
 - Travel Plan;
 - Phase I Geo-Environmental Desk Study and Coal Mining Risk Assessment;
 - Landscape and Visual Appraisal;
 - Archaeological Assessment;
 - Arboricultural Impact Assessment;
 - Statement of Community Involvement.
- 1.6 A large proportion of the site is currently allocated for residential development under Reference HA1 and HA2 of the Copeland Borough Council Local Plan 2001-2016 'Saved Policies' document.
- 1.7 Pre-Application consultation has been undertaken with Copeland Borough Council (CBC) who has have confirmed that, as the site has an extant Site Allocation, and the Council cannot demonstrate a 5 Year Land Supply, the principle of the development is acceptable.
- 1.8 Pre-Application discussions have also been undertaken with Cumbria County Council Highways Authority, Lead Local Flood Authority and County Archaeologist who have confirmed that the proposals are acceptable in principle.
- 1.9 A public consultation exercise was undertaken on Thursday 15th March 2018, where the views of the local community were sought and fed into the preparation of the planning application. A Statement of Community Involvement (SCI) accompanies this application.

- 1.10 In addition to the site being largely an extant Allocation, CBC have confirmed that it cannot currently demonstrate a 5 Year Land Supply of deliverable sites for homes and, as such, planning decisions should be made in accordance with Paragraph 49 of the NPPF, which clearly states:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.” (Paragraph 55).

- 1.11 This Planning Statement will demonstrate that the proposal conforms with the aspiration to provide sustainable development, as directed by the NPPF, and will provide economic, social and environmental benefits to the community of Whitehaven by significantly boosting the current supply of deliverable housing. The benefits of this proposal will include:

Economic Benefits

- The provision of new homes to attract and retain a growing and economically active workforce;
- Increased local household spend which will support local shops and services within Whitehaven and surrounding areas such as Hensingham;
- Generation of significant investment through the construction process, the creation of direct construction jobs and other jobs through indirect associated business;
- The provision of a combined New Homes Bonus to be reinvested in local services over a 6 year period.

Social Benefits

- Around 370 new, high quality homes to significantly boost the supply of housing to meet the Council's 5 Year Land Supply target;
- Improved choice of homes available to meet different population needs including affordable homes, larger family homes and bungalows;
- Provision of executive style homes for which there is an identified need;
- Provision of on-site affordable homes to meet identified local need;
- Improved pedestrian connectivity for school children accessing Whitehaven's 2 secondary schools;
- Provision of 7.1ha of publicly accessible open space.

Environmental Benefits

- High quality landscaping scheme to ensure a coherent blend between new and existing housing;
- Provision of wildlife corridors;
- Strong network of footpaths and greenspaces;
- Provision of wildlife buffer to protect the adjacent ancient woodland of Midgley Wood;
- Creation of new woodland and wetland habitats to strengthen existing wildlife corridors which will secure key habitats for local species, eg, water voles, as well as attracting new wildlife.

The Applicant

- 1.12 Homes England is the Ministry of Housing, Communities and Local Government's non-departmental public body which brings together land, money, expertise, planning and

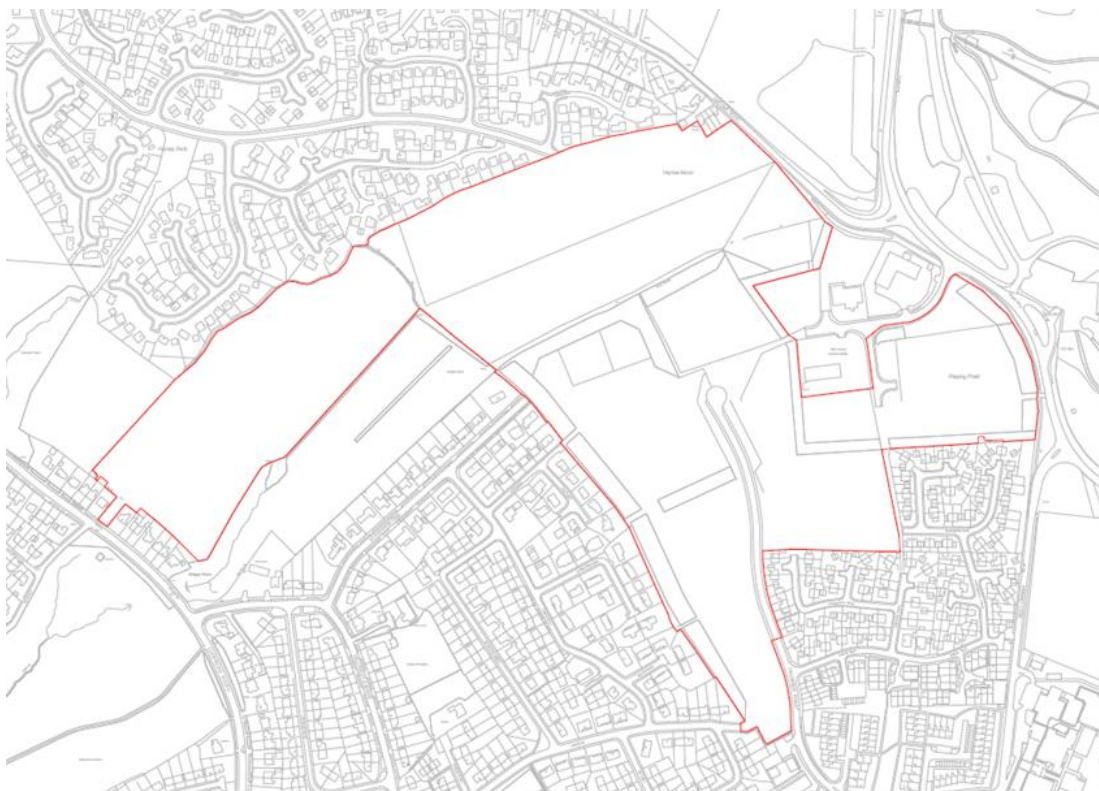


compulsory purchase powers, with a clear remit to facilitate delivery of sufficient new homes, where they are most needed, to deliver a sustained improvement in affordability.

- 1.13 Homes England works locally in individual communities to help meet local priorities and its investment helps build around half of all new homes built in England each year. It also helps increase local growth by creating jobs and supporting businesses.
- 1.14 Homes England owns public land, which is sold to housebuilders and others in order to overcome barriers to development and help increase the speed with which house builders can build new homes.

2.0 The Site and Surroundings

- 2.1 The application site, which covers a total of 23 hectares of land, is located to the south west of Harras Moor in Whitehaven which is the principal town within the CBC settlement hierarchy.



- 2.2 The site is an area of greenfield land which is currently, and has historically, been used for agricultural grazing purposes, with a small portion of the northern extent of the site being formerly used as a quarry.
- 2.3 The site was identified in 2015 within the CBC Local Plan 'Site Allocations and Policies Plan Preferred Options' document, for residential development of up to 450 units under references WH1 and WH2, and Pre-Application discussions have confirmed the Council intend to retain this allocation going forward within the emerging CBC Local Plan, which is due for public consultation in Summer 2018.
- 2.4 The site is bound directly to the north by the residential estate of the Highlands and to the south by the residential area of Hillcrest and Loop Road. To the north east of the site is Harras Road beyond which is land that has recently obtained outline planning permission for around 110 dwellings under references 4-16-2415-001 and 4-16-2416-001.
- 2.5 To the west of the site is the Red Lonning Industrial Estate located off Red Lonning road, beyond which is the Whitehaven Golf Club.
- 2.6 The topography of the land rises steeply from the Loop Road in the west up to Harras Road, levelling out in line with the Caldbeck Road entrance. The site benefits from distant views out to the Solway Firth and St Bees head at the crest of this hill.

- 2.7 The site is identified within the Cumbria Landscape Character Guidance Toolkit (CLCGT) map as being predominantly sub type category 5d (Urban Fringe).
- 2.8 The site is located within the Whitehaven main town settlement boundary and benefits from easy access to a wide range of community facilities within the town including shops, schools, churches, sports facilities and public transport. The site also benefits from being within walking distance of a number of facilities in the locality of Hensingham which includes the town's 2 secondary schools and the regional hospital, as well as a range of local shops, public houses and other services.
- 2.9 Midgey Wood is a designated Ancient Woodland located immediately south of the site (in separate ownership) running down to the Loop Road, beyond which it continues to west. Midgey Gill watercourse runs within the woodland.
- 2.10 A small portion of the site to the north was the location of the former Standing Stones quarry, which has been infilled for some years.
- 2.11 The site is located within Flood Zone 1 and is not at risk of flooding. The site is not the subject of any formal or informal ecological, historical or landscape designations.

Character of the Surrounding Area

- 2.12 Whitehaven is a Georgian town, situated on the west coast of Cumbria and was one of the first post-renaissance planned towns in the UK. The town's built heritage has been based upon a legacy of shipping and mining industries, both of which have now declined.
- 2.13 Outside of the Whitehaven town centre, the town is surrounded by a number of residential developments set into various hillsides.
- 2.14 The proposal site is surrounded, primarily, by residential development built over various decades since the 1930s. The residential development which runs along the frontage of Loop Road is mostly made up of inter-war style semi-detached properties, many of which have been altered and extended.
- 2.15 To south of the site, the Hillcrest residential estate has a broad range of house styles and sizes, with no one style being prevalent.
- 2.16 To the north of the site, the Highlands estate forms the most recent residential development in this area being constructed by Persimmon Homes in the 1990s. The houses within the Highlands range from 2 bedroom link properties to substantial 5 bedroom executive homes.



3.0 The Proposal

- 3.1 The application seeks outline planning permission (with access) for the development of up to 370 residential dwellings on land between Harras Road, Caldbeck Road and Loop Road, Whitehaven.
- 3.2 Whilst the proposal is made in outline, it is envisaged that the development will comprise a broad mix of house types, with the provision of between 15 – 25% on-site affordable housing.
- 3.3 Access to the site will be provided via Harras Road and Caldbeck Road which will connect to form a primary spinal road serving the site as a whole. From this spine road, a clear street hierarchy comprising principal streets through to local single-sided private drives will be provided. This street pattern will provide a clear response to the sites natural topography and will reduce the need for interventions such as extensive retaining walls.
- 3.4 There will also be pedestrian connections to Loop Road South, Highlands and to other residential streets to the east and west.
- 3.5 The proposals incorporate a rich landscaping strategy which will include 7.1 ha of publicly accessible open space split between formal play areas, wildlife buffers and corridors and an enhanced planting scheme which will strengthen existing woodland within the site as well as ensuring the protection of the woodland outside the site.
- 3.6 A SuDs drainage system will serve the site for the disposal of surface water, which will ultimately discharge to Midgey Gill at a rate no greater than existing greenfield run off.
- 3.7 Whilst being made in outline, at this preliminary stage it is envisaged that the site will be developed by 2 separate developers, each developing in 2 separate phases as shown on the Illustrative Phasing Plan (A090070-410-007).

4.0 Planning Policy and Guidance

- 4.1 The NPPF was published in March 2012 and consolidates national planning policy guidance (including all previous Planning Policy Statements and Planning Policy Guidance). The document is a material consideration in the determination of all planning applications.
- 4.2 At the heart of the Framework is the *"presumption in favour of sustainable development"* which should be seen as a 'golden thread' running through both plan-making and decision taking.
- 4.3 The NPPF defines 'sustainable development' and highlights that it has three interrelated dimensions; economic, social and environmental. These three dimensions give rise to the need for the planning system to perform a number of roles:
- **An economic role – Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.**
 - **A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating high quality built environment, with accessible local services that reflect the community's needs and supports its health, social and cultural well-being; and**
 - **An environmental role – contributing to protection and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy.** (Paragraph 7).
- 4.4 It is important to note that these roles should not be viewed in isolation but should be seen as mutually dependant. The NPPF states that, **"... to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system."** (Paragraph 8).

Core Principles

- 4.5 The NPPF sets out '12 Core Planning Principles' by which all planning decisions should be taken. Of relevance to this application are the following principles which state that planning should:
- **"not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;**
 - **Proactively drive and support sustainable development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and response positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;**

- **Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;**
- **Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;**
- **Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.” (Paragraph 17)**

Delivering a Wide Choice of High Quality Homes

4.6 In relation to the development of housing, Paragraph 47 of the NPPF requires Local Planning Authorities (LPA) to,

- **“use their evidence to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;**
- **identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements ... Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) ...”**

4.7 Paragraph 47 goes on to state:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”

4.8 In the absence of a 5 Year Land Supply, housing policies cannot be considered up-to-date and the NPPF states that applications must be determined in accordance with the *Presumption in Favour of Sustainable Development*. For decision taking, paragraph 14 states that this means granting planning permission unless:

- **“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; or**
- **Specific policies in this Framework indicate development should be restricted.”**

4.9 The NPPF provides guidance on other matters relating to new housing development in the context of:

Transport and Access

- 4.10 The NPPF states that decisions on large scale developments should take account of whether:
- **"The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.**
 - **Safe and suitable access to the site can be achieved for all people.**
 - **Improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."** (Paragraph 32).

Flood Risk and Drainage

- 4.11 NPPF states that, **"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing the flood risk elsewhere."** (Paragraph 100)

Promoting Healthy Communities

- 4.12 The NPPF emphasises the role of the planning system to facilitate the creation of healthy, inclusive communities. In relation to residential planning applications, developers are encouraged to provide:
- **Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active continual use of public areas.** (paragraph 69)
 - **Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.** (paragraph 70)
 - **Access to high quality open spaces and opportunities for sport and recreation."** (Paragraph 73).

Requiring Good Design

- 4.13 The NPPF attaches great importance to ensuring that all new development should be of the highest quality design possible, stating that **"good design is indivisible from good planning."** (Paragraph 56).
- 4.14 Local Authorities are required to, **"plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes."** (paragraph 57)
- 4.15 The NPPF requires that all new developments:

- **"Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;**
- **Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;**
- **Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of the developments) and support local facilities and transport networks;**
- **Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovations;**
- **Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;**
- **Are visually attractive as a result of good architecture and appropriate landscaping."** (Paragraph 58)

4.16 Whilst requiring high quality design in all developments, the NPPF also advises that Local Planning Authorities should not place design as the highest priority in the decision making process or dictate any particular architectural style. It states:

"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness" (Paragraph 60)

And

"Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment." (Paragraph 61).

4.17 However, the priority of supporting sustainable development is emphasised. The NPPF states:

"Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)." (Paragraph 65).

4.18 The Government produced a draft revision of the NPPF in March 2018 which is currently undergoing the consultation process.

Development Plan

- 4.19 The Development Plan consists of policies within the Copeland Local Plan 2013 – 2028 (CLP), adopted December 2013. The adopted Local Plan is currently 'Part 1' only consisting of a 'Core Strategy' (CS) of strategic policies and development management policies.
- 4.20 It is considered that the most relevant policies found within the CS in relation to this proposal are as follows:
- ST1 Strategic Development Principles;
 - ST2 Spatial Development Strategy;
 - ST4 Providing Infrastructure;
 - ER7 Principal Town Centre, Key Service Centres, Local Centres and other service areas: Roles and Functions;
 - SS1 Improving the Housing Offer;
 - SS2 Sustainable Housing Growth;
 - SS3 Housing Need, Mix and Affordability;
 - SS5 Provision and Access to Open Space and Green Infrastructure;
 - T1 Improve Accessibility and Transport;
 - ENV1 Flood Risk and Risk Management;
 - ENV3 Biodiversity and Geodiversity;
 - ENV5 Protecting and Enhancing the Borough's Landscapes;
 - DM10 Achieving Quality of Place;
 - DM11 Sustainable Development Standards;
 - DM22 Accessible Developments; and
 - DM24 Development Proposals and Flood Risk.
- 4.21 The CS does not contain sites allocated by the Council as suitable for future development, or updated settlement boundaries.
- 4.22 In January 2015 the Council published a consultation document titled Site Allocations and Policies Plan (SAPP) which set out the 'Preferred Options' of sites considered suitable for development.
- 4.23 More recently, however, the Council held an 'Extraordinary General Meeting' on the 9th May 2017. At that Full Council meeting the Council presented an Agenda Item titled 'Interim Housing Policy and Work Programme for the Copeland Local Plan'. The summary of that Agenda Item stated that:

"Local Planning Authorities are required to maintain a 5 year supply of deliverable housing sites in order to be regarded as having up to date policies relevant to housing in their Local Plan. Recent information has identified that the Council can no longer demonstrate a 5 year supply of deliverable sites.

This report outlines the implications for the Council of not having a 5 year supply of housing sites when making planning decisions for housing development proposals. It then identifies steps the Council can take to maintain a clear and positive framework to support housing development in the borough. These steps include the adoption of an Interim Housing Policy to continue to proactively shape development in the short term, and a programme to review and amend the Local Plan as appropriate."

4.24 The Agenda item also identified that:

1. The Council can only demonstrate a 2 years and 3 months' worth of deliverable housing supply;
2. 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 that these policies carry less than full weight in decision-making;
3. The Council would cease work on the SAPP and review the Core Strategy Policies, with a view to preparing a new Local Plan which is scheduled to be submitted to the Secretary of State in October 2018.

4.25 As an intervening measure the Council has adopted an Interim Housing Policy. The Interim Housing Policy 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 the housing delivery, a decision-making framework for planning applications that may not be fully in accordance with the development plan has been set out."**

4.26 The Interim Housing Policy states that the Council will, in addition to the development plan and other material considerations, consider residential development proposals that are adjacent to the existing built form of a settlement against 12 criteria that are listed in the Interim Policy.

4.27 The Interim Housing Policy has not been the subject of public consultation.

4.28 In the context of the above, policies within the CS relating to the delivery of housing cannot be considered up to date and therefore, in relation to decision making, the *Presumption in Favour of Sustainable Development* must be applied.

5.0 Appraisal

Principle of Development

- 5.1 Planning law requires that applications for planning permission must be determined in accordance with an up to date development plan unless material considerations indicate otherwise.
- 5.2 As CBC cannot currently demonstrate a 5 Year Supply of deliverable housing, the policies within the Local Plan relating to the delivery of housing cannot be considered up to date and the *Presumption in Favour of Sustainable Development* must be applied in relation to new development, as set out in Paragraph 14 of the NPPF.
- 5.3 The policies found within the adopted CS do, however, provide a good indication of the scale, type and location of development the Council would find acceptable within the Plan Area.
- 5.4 Whitehaven is identified as CBC's largest and principal town. Policy ST2 sets out the Council's spatial strategy and states:

"Development in the Borough should be distributed in accordance with the following principles:

B: Concentration: development will be located in the Borough's settlements at an appropriate scale, within defined settlement boundaries, in accordance with the Borough's settlement hierarchy as set out in Figure 3.2:

i) Focusing the largest scale development and regeneration on Whitehaven and the important development opportunities there."

- 5.5 In setting out appropriate scale and type of development within the spatial strategy, the Council have identified a settlement hierarchy in Figure 3.2 which, for the Whitehaven area, states:

"Housing. Allocations in the form of estate-scale development where appropriate and continuing initiatives for large scale housing renewal. This could involve extensions to the town's settlement boundary. Infill and windfall housing. Larger sites will require a proportion of affordable housing."

- 5.6 The proposal offers a large estate-scale development which is located wholly within the existing settlement boundary of Whitehaven and is therefore in accordance with Policy ST2.
- 5.7 The CS sets out other strategic policies which specifically relate to the development of new housing.
- 5.8 Policy SS1 (Improving the Housing Offer) states:

"The Council will work to make Copeland a more attractive place to build homes and to live in them, by:

A. Allocating housing sites to meet local needs in locations attractive to house builders and requiring new development to be designed and built to a high standard."

- 5.9 The proposed development is situated in a popular residential location of the Whitehaven and is therefore considered to be an attractive prospect for future developers and entirely deliverable.
- 5.10 Policy SS2 (Sustainable Housing Growth) states:
- B. "House building to meet the needs of the community and to accommodate growth will be provided for by:**
- a) Allocating sufficient land for new housing development to meet identified requirements within the Borough :**
- b) Allocating land in accordance with the following housing targets:**
- i) A baseline requirement, derived from projected household growth, of 230 dwellings per year;**
- ii) ii) Provision for growth 30% above that, to 300 dwellings per year**
- c) Seeking densities of over 30 dwellings per hectare, with detailed density requirements determined in relation to the character and sustainability of the surrounding area as well as design considerations**
- d) Seeking to achieve 50% of new housing development on previously developed 'brownfield' sites"**
- 5.11 In Whitehaven, annual housing completion rates have averaged at 65.5 units per annum since April 2013. Across this period, the annual housing target for Whitehaven alone was 103.5 new dwellings leading to a significant undersupply of new homes in the principal settlement. The Council have acknowledged this undersupply and have therefore introduced an Interim Housing Policy as a means to determine planning applications.
- 5.12 CBC do not have an up to date site allocation policy, however large parts of the proposed site were allocated in the extant 2006 Local Plan under references HA01 and HA02.
- 5.13 Furthermore, in January 2015 CBC published the SAPP document in which the Council identified the majority of the proposal site as 'Possible Housing Allocation' under references WH1, WH2 and WC, being identified as being able to accommodate around 450 houses.
- 5.14 The proposed development represents a significant contribution to the identified housing need in the Whitehaven area and, as a site previously identified by the Council as a sustainable location, it therefore supports the aspirations of Policy SS2 as well as conforming with the *presumption in favour of sustainable development*.
- 5.15 It has been confirmed during pre-application discussions that as the proposed development is in conformity with the existing Development Plan, the provisions of the Interim Housing Policy are not triggered by this application.
- 5.16 In respect of all matters addressed above, it is clear that the principle of the proposed development is acceptable.

Housing Need and Mix

5.17 Policy SS3 (Housing Needs, Mix and Affordability) sets out the Council's requirement that new housing development should provide a broad mix of housing to deliver a range and choice of homes to meet the Borough's identified need.

5.18 The policy states:

"Development proposals will be assessed according to how well they meet the identified needs and aspirations of the Borough's individual Housing Market Areas as set out in the Strategic Housing Market Assessment, by:

- i Creating a more balanced mix of housing types and tenure within that market area, in line with the evidence provided in the SHMA;**
- ii Including 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;**
- iii Establishing a supply of sites suitable for executive and high quality family housing, focussing on Whitehaven and its fringes as a priority and also giving particular attention to the three smaller towns;**
- iv Ensuring that housing meets special needs, for example those of older people, where there is a genuine and proven need and demand in a particular locality;**
- v Providing housing for specific groups where there is housing need, including temporary workforce, agricultural workers and key workers."**

5.19 In relation to the identified housing need within the Whitehaven area, the most recently published evidence base document is the 2012 topic paper "Housing" which is based upon the 2011 Strategic Housing Market Assessment (SHMA) and the Copeland Housing Strategy 2011. It is understood, however, that the Council are currently undertaking a SHMA update, but this is not available to date.

5.20 The type and mix of housing required within the Borough is set out within the Topic Paper as such:

"The SHMA highlights that there is a general lack of choice within the current stock, with particular needs for family homes and for housing to accommodate the ageing population.

In terms of dwelling types, the SHMA (paragraph 4.25, table 4.4) indicated unsatisfied demand for:

- Larger (especially four bedroom) houses in the north of the Borough;**
- Smaller (one or two bedroom) houses in mid and south Copeland;**
- Detached houses across the Borough;**
- Bungalows in Whitehaven and Egremont."**

5.21 Whilst being submitted as an outline application the proposed development indicatively offers a broad mix of house types which will be attractive to a range of residential requirements.

5.22 The Illustrative Layout Plan (A900070-410 004) shows a development comprising a range of 2, 3, 4 and 5 bedroomed properties comprising a mixture of detached, semi-detached, terraced and bungalow houses.

- 5.23 The Illustrative Layout Plan also sets out how the different house types will be located across each phase in a non-uniform pattern allowing for a diverse and well balanced new residential development.
- 5.24 Due to a number of site constraints, including steep topographical levels, ecological and environmental mitigation and the requirement for a robust drainage strategy, it is not possible to deliver the full capacity of residential units (450 units) which were originally allocated by the Council on this site.
- 5.25 The CBC SHMA market research also suggests that the identified need for affordable housing in Whitehaven is not as strong as the need for larger family homes and bungalows.
- 5.26 It is therefore considered that a pragmatic approach to the delivery of affordable housing is taken, and on this basis the applicant will provide a contribution of between 15 – 25% affordable homes in accordance with Policy SS3 and informed by discussions with officers of the Council.
- 5.27 Whilst being an outline application it is not appropriate to set out details of specific quantum, type or tenure of affordable housing to be provided. The final tenure of affordable housing will also be informed through discussions with officers of the Council during the application process.
- 5.28 In respect of the above it is considered that the proposed development accords with Policy SS3 in that it provides for a broad mix of housing types to meet a range of identified needs, most specifically larger family homes and bungalows.

Layout and Design Principles

- 5.29 Whilst being made in outline, this application is accompanied by an Illustrative Masterplan, Illustrative Layout Plan, Illustrative Phasing Plan. These plans have been informed by a detailed analysis of the sites constraints and parameters which are set out within the Design and Access Statement.
- 5.30 Policy DM10 sets out the Council's requirements for new development to be of a high standard of design, setting out a number of criteria by which all applications will be assessed. Developers will be required to:

- "A Incorporate a complementary mix of uses, especially within or near town centres or at sites adjacent to public transport routes;**
- B Respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through:**
 - i) An appropriate size and arrangement of development plots**
 - ii) The appropriate provision, orientation, proportion, scale and massing of buildings**
 - iii) Careful attention to the design of spaces between buildings, including provision for efficient and unobtrusive recycling and waste storage**
 - iv) Careful selection and use of building materials which reflects local character and vernacular**
- C Incorporate existing features of interest including landscape, topography, local vernacular styles and building materials; and in doing so, have regard to the maintenance of biodiversity**

- D Address vulnerability to and fear of crime and anti-social behaviour by ensuring that the design, location and layout of all new development creates:**
- i) Clear distinctions between public and private spaces**
 - ii) Overlooked routes and spaces within and on the edges of development**
- E Create and maintain reasonable standards of general amenity**
- F Incorporate new works of art as part of development schemes where appropriate"**

5.31 In relation to the constraints and analysis which have guided the Masterplan, the following design principles have been addressed:

Place Making

5.32 The proposed development will provide:

- Strong gateways and arrival points from the surrounding area;
- Distinctive sweeping streets and lanes, working with the terrain across the site and with changes in direction that add interest and slow traffic;
- Sequential views out over Whitehaven towards the coast, changing as the view travels down through the site;
- Strong green corridors and edges to the development overlooked by good quality development frontages. All green spaces will be overlooked.

Connectivity

5.33 The site will provide a high level of permeability, connecting different residential areas together through a network of footpaths, providing benefits for residents outside the development proposal.

- The primary vehicle route between Harras Road and Caldbeck Road provides access to and through the site;
- Pedestrian connection is provided to Loop Road South through the development and new public open space is created here. Potential pedestrian connectivity is proposed to other existing streets where possible;
- A clear street hierarchy is proposed: moving from principle streets through to local single sided private drives fronting green spaces and green corridors.

Density

5.34 The application area covers around 23 hectares of land, which based upon the Council's standard density requirement (Policy SS2) of 30 dwellings per hectare, would equate to around 690 dwellings. Although made in outline, the applicant is applying for significantly fewer dwellings per hectare as it is important that the development of this site is influenced by the landscape and environmental context rather than a pre-determined target.

5.35 The following principles have therefore been applied in relation to the density of development proposed:

- This is a challenging, sloping site where high density development would be both inappropriate and difficult to deliver;
- Density will be guided by site levels and will reduce significantly where levels are steeper; and
- Density will reflect surrounding residential areas so that existing residents in the area will see development of similar density to their own estate nearby.

Topography and Street Pattern

- 5.36 A significant constraint of the site is the topography which slopes steeply upwards from west to east. The proposed development will therefore work with the natural features of the site, utilising the hill to create a distinctive sense of place.
- The street pattern is a clear response to the site terrain and reflects the need to create streets of an acceptable gradient for adoption by the highway authority. The design also reduces the need for extensive retaining walls;
 - Spaces will be designed with levels in mind, to ensure public open spaces are useable to residents of the scheme; and
 - Strong views through and across the scheme, maximising the distinctive views towards the sea from the higher ground.

Landscape Character

- 5.37 A full Landscape and Visual Appraisal (LVApp) accompanies this planning application. The LVApp provides an assessment of the effects of the proposed development on the local landscape. The design of the proposed development and the identification of mitigation measures incorporated within the design to minimise adverse effects, is informed by the findings of the assessment process as it has progressed throughout the preparation of the application.
- 5.38 The site predominantly comprises parcels of semi-improved and rough grassland used for grazing horses and livestock, with areas of grassland separated by bands of mature planting.
- 5.39 A key feature of the site identified in the LVApp is the belts of mature deciduous woodland within the site and on the site perimeters. The existing woodland assists in integrating the site into the wider landscape and is considered typical of the local landscape character. The presence of the woodland also screens views into the site from many locations.
- 5.40 The LVApp identifies a number of receptors which may be impacted by the proposed development. The sensitivity of the landscape receptors is judged by considering their value, assessed against a baseline, and their susceptibility to the changes arising from the proposed development. The resulting conclusions in relation to landscape impact range between negligible effects, moderate adverse effects and minor adverse effects.
- 5.41 In relation to the visual effects of the development experienced by nearby residents, the results range from negligible or no effect to major adverse effect, depending on the proximity of the residents to the new development and the level of screening which is either existing or will be introduced through the development. Those residents whom will experience a permanent change in their outlook are considered to have the potential for a major adverse effect.
- 5.42 As a site which has been predominantly allocated by CBC for residential development in the past, and has been identified once more as preferable for allocation, it is accepted that the

Council have already weighed landscape impact in the balance of planning considerations and have deemed the development of this site as acceptable.

5.43 Policy ENV5 (Protecting and Enhancing the Borough's Landscapes) states that:

"B Where the benefits of the development outweigh the potential harm, ensuring that the impact of the development on the landscape is minimised through adequate mitigation, preferably on-site."

5.44 The proposed development offers a high quality landscaping scheme which utilises the natural features and topography of the site to create a development which is truly landscape led. The retained and enhanced areas of woodland will ensure the development integrates with the green character of this site.

5.45 It is therefore considered that the benefits of the development are significant and are compliant with Policy ENV5.

Ecology and Biodiversity and Landscaping Plans (Including trees and hedgerows)

5.46 An Extended Phase 1 Ecological Survey and associated surveys have been undertaken and accompany this application.

5.47 The report confirms that there are no internationally designed areas of ecological importance located within 5km of the site. The site is within the St Bees Head SSSI Impact Risk Zone, however the proposals are not listed as a likely risk to the designation.

5.48 There are no locally designated sites within the application boundary. There are five locally designated sites within 1km of the site including three County Wildlife Sites, one Local Geological Site and one Site of Invertebrate Significance. The distance between the closest sites (Midgey Gill and Castle Park Woods) is approximately 15m.

5.49 Midgey Wood is directly adjacent to the application boundary. It is an ancient woodland and in private ownership with the canopy and understory of the trees being readily visible from the site. As an ancient woodland, an undeveloped buffer of a minimum width of 15m from the woodland edge will be retained as green infrastructure as shown on the Illustrative Masterplan.

5.50 The site is dominated by areas of grassland, with varying degrees of marshiness and botanical diversity. A number of the fields are edged with shelter belts of plantation woodland. A number of areas of the site were initially identified as having the potential to support protected or priority species including bats, badgers, red squirrels, amphibians, breeding and wintering birds. A series of surveys has now been undertaken, the results of which accompany this application.

5.51 The extended phase 1 habitat survey included a ground-based assessment of trees within the site for bat roosts by an appropriately licenced ecologist. This included trees that would be affected by the proposed road crossing. No bat roosts were identified and the trees in question were generally too immature to develop features that support roosts.

5.52 The Indicative Masterplan demonstrates that, apart from specific road crossings which are less than 10m wide, there will be no loss of woodland canopy. Thus, no adverse effects are likely to arise on commuting patterns of bats which may roost in properties or woodlands near the site, and no further bat activity surveys are necessary prior to determination of the outline Application.

- 5.53 A review of the surrounding area identified 5 ponds within 250m of the site. There are also small areas of standing water on site, including ephemeral wet ditches and a flush. The waterbodies on site are unsuitable for breeding of newts, but will support common toads and other amphibians. It is confirmed that there is no evidence that Great Crested Newts are present in the area, nor do they present a constraint on development. The Ecology Mitigation plan within the Design and Access Statement indicates how aquatic and woodland habitats of value to toads and other amphibians will be retained and enhanced.
- 5.54 It is confirmed therefore that the proposed development will have no implications in respect of any European Protected Species.
- 5.55 In respect of UK protected and priority species, field surveys to date have not indicated the presence of red squirrels or badgers within the site itself. Some water vole feeding signs have been found in a wet flush area and further investigation and mitigation / avoidance measures will be required.
- 5.56 The Ecological Appraisal sets out a number of recommendations for maintaining and building the ecological evidence base through the development process, which is envisaged to take place in phases, following individual reserved matters applications. These further surveys will monitor the use of the site by any protected and priority species and, where appropriate, identify the requirement for either overarching or site-specific measures to ensure any potentially significant impacts are either avoided or appropriately mitigated. This approach can be secured by condition by the Council.
- 5.57 From the surveys undertaken to date, it is considered that there are no ecological issues that would prevent the development of the site or are there likely to be any significant ecological effects that require further consideration as part of this outline application.

Access and Transport

- 5.58 This outline application also seeks approval for the matter of 'access' and this is accompanied by a full Transport Assessment (TA) and a sustainable Travel Plan (TP).
- 5.59 The TA has undertaken a full review of the local highway network in relation to the potential development of this site, which included detailed modelling exercises of all nearby junctions and roads likely to be affected. The results of the TA show that all related junctions will continue to operate well within capacity and there are no issues of concern in relation to traffic safety or highway network capacity.
- 5.60 The proposed development will be served via 2 vehicular accesses, one onto Harras Road to the north east, and one joining Caldbeck Road. The proposed junctions will be 5.5m wide with visibility splays of 2.4m x 63m which has been agreed with the Highways Authority as acceptable based upon traffic speed surveys carried out. Each access will include a 2m footpath which will service the internal layout of the development.
- 5.61 Whilst being made in outline it can be confirmed that the proposal will provide parking in accordance with the parking standards set out in 'Parking Guidelines in Cumbria', these being:
- 2 bed houses – 2 spaces per unit;
 - 3 and 4 bed houses – 2.5 spaces per unit;
 - 5+ bed houses – 3 spaces per unit.

- 5.62 In addition to the above, 1 space per 5 units will be provided for visitor parking and garages will provide enough accommodation for a standard vehicle and domestic storage.
- 5.63 Appropriate servicing access will be provided to each property for deliveries and refuse collections. These matters will be dealt with in detail as part of any Reserved Matters planning application.
- 5.64 The layout of the proposed development will ensure that pedestrian access and connectivity is given priority and will encourage sustainable movement patterns.
- 5.65 The proposed development is therefore considered to be in accordance with the requirements of Policy DM22 (Accessible Developments).

Flood Risk and Drainage

- 5.66 This application is accompanied by a full Flood Risk Assessment and Drainage Strategy.
- 5.67 The proposed development is located within Flood Zone 1 which the Environment Agency define as an area having less than 0.1% annual risk of flooding and is therefore at the lowest risk of flooding. This is therefore considered to be a low risk in terms of flooding.
- 5.68 The DEFRA Non-Statutory Technical Standards for Sustainable Drainage requires that the rate of surface runoff from greenfield sites must not exceed the runoff rate from the pre developed greenfield site. Therefore, on site attenuation will be provided within the application site to make sure that the proposed surface water drainage system does not exacerbate flood risk outside of the extent of the proposed development for all storm events up to and including the 1 in 100 plus 40% allowance for climate change storm event.
- 5.69 One of the primary objectives of the new surface water strategy will be to open up and improve the existing watercourse in order to create new blue corridors within the development. By suitable design and additional planting, it is proposed to enhance the existing ecology and bio diversity of these watercourses, whilst at the same time managing the surface water run-off. In addition and where possible small weirs will also be installed along the lengths of the watercourse to provide localised wetland areas and to slow the velocity of the main channel flow.
- 5.70 Additionally, it is proposed to enhance the existing watercourses in the north eastern part of the site by opening these up and regrading and improving channels, as they are currently poorly defined.
- 5.71 In relation to surface water discharge it is proposed to divide the site into two surface water drainage catchments, to the east and west of the site. The eastern catchment will drain to the culverted watercourse under Balmoral road; whereas the western catchment will drain to Midgey gill. Discharge rates into these watercourses will be restricted to the greenfield rate of the impermeable areas of the site.
- 5.72 This strategy enables the delivery of a phased development as it provides several attenuation features that can be constructed as the phases progress.

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- 5.73 While being made in outline, the proposed development will include a variety of SuDS techniques such as swales, detention and, if viable, rain water harvesting to ensure that discharge rates are limited to greenfield levels.
- 5.74 Due to the steep nature of the site, attenuation storage will be provided in a combination of swales and detention basins where possible. Liaison with CCC Lead Local Flood Authority and United Utilities will confirm and advise on the adoptability.
- 5.75 In relation to foul water discharge, it is proposed to divide the site into a number of foul water catchments that will drain to the existing United Utilities sewer network.
- 5.76 Pre-application consultation has been undertaken with United Utilities whom have agreed the principles above, subject to details being provided at Reserved Matters stage.

Noise and Local Amenity

- 5.77 This application is accompanied by a comprehensive Noise survey in relation to the potential for the development to cause, or be affected by any sources of noise pollution, in particularly the Red Lonning Industrial Estate which has a number of heavy industrial businesses operating within it and the busy A595 trunk road.
- 5.78 The results of the report conclude that the proposed development is not expected to have an adverse impact on the health or quality of life of either existing local residents, or future residents of the development.
- 5.79 Common design features of new modern homes such as standard double glazing and ventilation points will be adequate to ensure appropriate amenity levels are secured. As a further good practice measure, the Illustrative Layout and Masterplan show a stand-off zone between the proposed houses and the A595 (Loop Road) and the Red Lonning Industrial Estate. Barriers in the form close boarded fences will also be introduced at the detailed design phase to further minimise noise in external amenity areas.
- 5.80 In respect of the above, it is evident that the proposed development will have no adverse affect on local amenity with respect to potential noise pollution.

Ground Conditions

- 5.81 A full Preliminary Environmental Risk Assessment (PERA) has been carried out on the site and the report accompanies this application.
- 5.82 No potentially contaminative activities associated with previous land uses were observed onsite.
- 5.83 A small quarry know as 'Standing Stones Quarry' was historically located at the eastern end of the site, and this appears to have been infilled. A number of mounds have also been identified which have the potential to contain waste from the former quarries on site.
- 5.84 The site does not lie within a groundwater Source Protection Zone therefore the site is classified as having limited potential for groundwater flooding.
- 5.85 In relation to former mining activities on site, there has historically been working coal seams beneath the central and eastern parts of the site.

- 5.86 It is reported to be unlikely that the former works would cause settlement issues, however, it is recommended that a ground investigation be carried out to confirm this assessment and determine what, if any, remedial measures are required.

Archaeology

- 5.87 A full Archaeological Appraisal accompanies this planning applications which assessed all potential assets of historical significance within, or nearby, the site which may be impacted upon by the proposed development.
- 5.88 The Assessment determined that there are no designated assets recorded within the proposal site and three undesignated assets present, these being two former quarries and the possible location of a Bronze Age stone circle.
- 5.89 It has been assessed that the potential for further unrecorded assets is deemed to be of low probability and it is not anticipated that there will be any detrimental impacts upon any designated heritage asset.
- 5.90 The application will be further assessed by Cumbria County Council who may recommend further investigation works as part of any further detailed application.

Infrastructure and Developer Contributions

- 5.91 Policy ST4 (Providing Infrastructure) sets out the Council's commitment to ensuring that necessary infrastructure is available to meet the needs of the community in the context of any forthcoming development.
- 5.92 The development will provide between 15 and 25% of affordable units to be provided on site in accordance with Policy SS3 of the CLP.. The type and tenure of the units will be negotiated during the application process and in consultation with the Council's housing needs officer.
- 5.93 A quantum of at least 7.1 ha of publicly accessible open space will be provided and the developer will be required to maintain this provision at their own expense via a management agreement.
- 5.94 In addition to the affordable housing and open space provision to be committed onsite through this development proposal, the applicant is aware that planning contributions may be sought by the Council in respect of other community services, such as contributions to education, public transport and improvements to local play areas, etc.
- 5.95 Any contributions or improvements required will be informed by Cumbria County Council during the application process based on relevant need for provision.
- 5.96 The applicant will discuss and negotiate any requests positively with the Council and in the context of Paragraph 204 of the NPPF.

6.0 Conclusion

- 6.1 In the absence of a 5 Year Land supply the Council are required to assess applications in the context of the "*Presumption in Favour of Sustainable Development*" which requires that planning applications for housing development should be granted planning permission **"unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole."** (Paragraph 14).
- 6.2 Irrespective of the above, CBC have confirmed during pre-application discussions that as the proposed development is in conformity with the existing Development Plan, the application is acceptable in principle.
- 6.3 With regards to this application, whilst being made in outline, it has been demonstrated that the proposed development is appropriate in relation to:
- Scale and layout;
 - Housing mix and sense of place;
 - Access and sustainable travel;
 - Ecology and Biodiversity;
 - Flood risk and drainage; and
 - Ground conditions and archaeology
- 6.4 The proposal provides the opportunity to deliver a sustainably located housing development on a site which is well related to the built form of Whitehaven and will provide valuable high quality homes to meet a broad range of needs.
- 6.5 It is clear that the proposed development accords with the objectives of the NPPF and extant policies within the CBC CS.
- 6.6 If, contract to the views expressed in this statement, any harm were alleged to occur as a consequence of the development, the extent of the harm would have to be weighed against the overwhelming policy support in favour of boosting the supply of high quality housing, which is a matter which is given significant weight in policy terms.
- 6.7 In respect of matters addressed within this planning application, it is evident that the proposed development accords with all relevant national and local planning policy and planning permission should be forthcoming.