

Land to the west of Valley View Road, Whitehaven

(Edgehill Park Phase 4)

Full planning application for 109 dwellinghouses and associated infrastructure including landscaping, open space, access, highway and drainage.

Planning Statement

August 2022

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1) Introduction

- 1.1 The following Planning Statement supports a full planning application for;
 - 109 dwellinghouses and associated infrastructure including landscaping, open space, access, highway and drainage on land west of Valley View Road, Whitehaven.
- 1.2 The Statement sets out the site description, planning position, and how the proposal responds to the policy requirements such as the affordable housing strategy and technical elements of the application including environment and sustainable design, natural environment, drainage, and highways.
- 1.3 An Environmental Impact Assessment (EIA) Screening Opinion for Proposed Residential Development at the Site for circa 115 units was submitted to Copeland Borough Council (CBC) in September 2021. The Council concluded that the proposed development does not constitute Environmental Impact Assessment development. The decision letter is appended at Appendix 1.
- 1.4 The application shall be subject to a s106 legal agreement and proposed draft Heads of Terms are included in Appendix 2.
- 1.5 The Statement is to be read in conjunction with the separate Affordable Housing Statement and Statement of Community Involvement.
- 1.6 The application is accompanied by a suite of full plans and technical reports required in accordance with CBC local validation list.
 - Planning Application Form
 - Planning Statement – August 22
 - Affordable Housing Statement – August 22
 - Statement of Community Involvement – August 22
 - Design and Access Statement (Design by Pod)
 - Geophysical Survey Report (Magnitude Surveys Ref MSNX1150A, January 2022).
 - Archaeological geophysical survey area plan (Magnitude Surveys Ref MSNX1160 Preliminary Figure)
 - Flood Risk Assessment Report (Coopers report ref: 7843FRA dated 29 July 2022)
 - Foul Water calculations dated 21st July 2022.
 - Surface Water calculations dated 21st July 2022.
 - Archaeological Appraisal (CFA Ref Y456/22 dated February 2022)
 - Geo-environmental Appraisal (iD Geo Report No. 4046-G-R024, dated December 2021).
 - Transport Assessment (i-Transport Ref JW/MS/ITM17460-001B, dated 4th July 2022)
 - Residential Travel Plan (TPS, July 2022)
 - Preliminary Ecological Appraisal (Urban Green, January 2022)
 - Biodiversity Net Gain Design Stage Assessment (Urban Green, June 2022)
 - Biodiversity Enhancement Management Plan (Urban Green, June 2022)
 - eDNA survey (Urban Green May 2022)
 - Arboricultural Impact Assessment (Urban Green, August 2022)
 - Landscape and Visual Appraisal (Urban Green, August 2022)

- Landscape General Arrangement Plan, Drawing No. UG_1415_LAN_GA_DRW_01 Rev P06.
- Soft Landscape Plan sheet 1 of 7, Drawing No. UG_1415_LAN_SL_DRW_01 Rev P04.
- Soft Landscape Plan sheet 2 of 7, Drawing No. UG_1415_LAN_SL_DRW_02 Rev P04.
- Soft Landscape Plan sheet 3 of 7, Drawing No. UG_1415_LAN_SL_DRW_03 Rev P04.
- Soft Landscape Plan sheet 4 of 7, Drawing No. UG_1415_LAN_SL_DRW_04 Rev P04.
- Soft Landscape Plan sheet 5 of 7, Drawing No. UG_1415_LAN_SL_DRW_05 Rev P04.
- Soft Landscape Plan sheet 6 of 7, Drawing No. UG_1415_LAN_SL_DRW_06 Rev P04.
- Soft Landscape Plan sheet 7 of 7, Drawing No. UG_1415_LAN_SL_DRW_07 Rev P04.
- Proposed Highways Longsections Sheet 1 of 2, Drawing No. 7843/SK03-1 Rev C
- Proposed Highways Longsections Sheet 2 of 2, Drawing No. 7843/SK03-2 Rev C
- Drainage Strategy, Drawing No. 7843/SK04 Ref F.
- Site Sections sheet 1 of 2, Drawing No. 7843/SK08-1 Rev E
- Site Sections sheet 2 of 2, Drawing No. 7843/SK08-2 Rev D
- Strategy Levels plan, Drawing No. 7843 / SK09 Rev C
- Proposed Site Location Plan Drawing No. 66D-STO-002
- Detailed Site Layout Plan, Drawing No. 66D-STO, 100 Rev P
- Detailed Site Layout Plan Coloured, Drawing No. 66D-STO, 101 Rev B
- Proposed Elevation Treatment Plan, Drawing No. 66D-STO, 102 Rev H
- Proposed Boundary Treatment Plan, Drawing No. 66D-STO, 103 Rev E
- Proposed Parking Provision Plan, Drawing No. 66D-STO, 104 Rev E
- Proposed Hard Surfaces Plan, Drawing No. 66D-STO, 105 Rev E
- Proposed Management Plan, Drawing No. 66D-STO, 106 Rev E
- Proposed Street Scenes, Drawing No. 66D-STO, 107 Rev B
- Boundary Details – 1800mm High Fence drawing number BD-03 rev A, 1800mm Lapped Fence drawing number BD-06, 1762 High Brick Wall drawing number BD-15, 1100mm Estate Railings drawing number BD-30, 450mm Trip Rail drawing number BD-70.
- Material Samples
- Alexander (A), Contents: Planning drawing number AXR-P-CON rev B, Planning Layout 1 drawing number AXR-PLP1 rev A, Planning Elevation 1/1 drawing number AXR-PLE1/1 rev B, Planning Elevation 1/2 drawing number AXR-PLE1/2 rev B.
- Branford M4 (2) S Planning Drawings, Contents: Planning drawing number BFD-P-CON rev B, Planning Layout 1 drawing number BFD-PLP1 rev A, Planning Elevation 1/1 drawing number BFD-PLE1/1 rev B, Planning Elevation 1/2 drawing number BFD-PLE1/2 rev B.
- Cooper (A) Contents: Planning drawing number CPR-P-CON rev C, Planning layout 1 (semi) drawing number CPR-PLP1 rev A, Planning Elevation 1/1 (semi) drawing number CPR-PLE1/1 rev B, Planning Elevation ½ (Semi) drawing number CPR-PLE1/2 rev B, Planning layout 2 (Front) drawing number CPR-PLP2 rev A, Planning Elevation 2/1 (Front) drawing number CPR-PLE2/1 rev B, Planning Elevation 2/2 (Front) drawing number CPR-PLE2/2 rev B, Planning Layout 3 (corner) drawing number CPR-PLP3 rev A, Planning Elevation 3/1 (Front) drawing number CPR-PLE3/1 rev B, Planning Elevation ¾ (corner) drawing number CPR-PLE3/4 rev B.
- Fulford M4 (2) S Contents: Planning drawing number FFD-P-CON rev B, Planning Layout 1 drawing number FFD-PLP1 rev B, Planning Elevation 1/1 drawing number FFD-PLE1/1 rev B, Planning Elevation ½ drawing number FFD-PLE1/2 rev B.
- Grayson (A) Planning drawings, Contents: Planning Drawing number GRN-P-CON, Planning Layout 1 drawing number GRN-PLP1, Planning Elevation 1/1 drawing number GRN-PLE1/1, Planning Elevation ½ drawing number GRN-PLE1/2.

- Garage booklet single garage 1 planning drawing 1/1 drawing number SG-PLP1/1 rev A,
- Harper (A) Contents: Planning drawing number HPR-P-CON rev C, planning layout 1 drawing number HPR-PLP1 rev B, Planning Elevation 1/1 drawing number HPR-PLE1/1 rev C, Planning Elevation ½ drawing number HPR-PLE1/2 rev C.
- Hewson (A) Contents: Planning drawing number HWN-P-CON rev D, planning layout 1 drawing number HWN-PLP1 rev B, Planning Elevation 1/1 drawing number HWN-PLE1/1 rev D, Planning Elevation ½ drawing number HWN-PLE1/2 rev D, Planning Elevation 1/3 drawing number HWN-PLE1/3 rev D.
- Masterton (A) Contents: Planning drawing number MTN-P-CON rev D, Planning Layout 1 drawing number MTN-PLP1 rev B, Planning Elevation 1/1 drawing number MTN-PLE1/1 rev D, Planning Elevation ½ drawing number MTN-PLE1/2 rev D.
- Rushford M4 (2) S Contents: Planning drawing number RFD-P-CON rev B, planning layout 1 drawing number RFD-PLP1 rev A, Planning Elevation 1/1 drawing number RFD-PLE1/1 rev A, Planning Elevation ½ drawing number RFD-PLE1/2 rev A.
- Sanderson (A) Contents: Planning drawing number SAN-P-CON rev D, planning layout 1 drawing number SAN-PLE1 rev C, Planning Elevation 1/1 drawing number SAN-PLE1/1 rev C, Planning Elevation ½ drawing number SAN-PLE1/2 rev C, Planning Elevation 1/3 drawing number SAN-PLE1/3 rev C
- Spencer (A) Contents: Planning drawing number SPR-P-CON rev E, Planning Layout 1 drawing number SPR-PLP1 rev C, Planning Layout 2 drawing number SPR-PLP2 rev C, Planning Elevation 1/1 drawing number SPR-PLE1/1 rev D, Planning Elevation ½ drawing number SPR-PLE1/2 rev D, Planning Elevation 2/1 drawing number SPR-PLE2/1 rev D, Planning Elevation 2/2 drawing number SPR-PLE2/2 rev D
- Wilson (A) Contents: Planning Drawing number WLN-P-CON rev E, Planning Layout 1 (Front) drawing number WLN-PLP1 rev C, Planning Elevation 1/1 (Front) drawing number WLN-PLE1/1 rev C, Planning Elevation ½ (Front) drawing number WLN-PLE1/2 rev C, Planning Elevation 1/3 (Front) drawing number WLN-PLE1/3 rev C, Planning Layout 2 (Corner) drawing number WLN-PLP2 rev C, Planning Elevation 2/1 (Corner) drawing number WLN-PLE2/1 rev C, Planning Elevation 2/3 (corner) drawing number WLN-PLE2/3 rev C, Planning Elevation 2/4 (Corner) drawing number WLN-PLE2/4 rev C.

2) Site Description

- 2.1 The Site is an open pastoral field located on the southern periphery of Whitehaven and sits between the ongoing Edgehill Park development to the west and the Greenbank social housing estate to the east.
- 2.2 The Site measures 15.37 gross and 8.1 net developable acres. The developable area is concentrated in a plateau of land in the centre / north west of the Site. The landform quickly falls away near the eastern boundary and the public right of way to the south.
- 2.3 There is a single detached private dwelling known as 'High House' located adjacent the south-west of the Site. This dwelling is accessed via an existing track that connects to Gameriggs Road to the east. The track doubles in part as a public footpath (no. 431031) which crosses the site.

3) Planning Policy and Assessment

Planning Policy

- 3.1 Section 70 of the Town and Country Planning Act 1990 and Section 38 of the Planning and Compulsory Purchase Act 2004, to the extent that development plan policies are material to an application for planning permission, requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. The starting point in the decision making process is the Copeland Borough Council Local Plan.
- 3.2 At a national level, paragraph 11 of the NPPF requires plans and decisions to apply a presumption in favour of sustainable development. For decision making this means approving development proposals that accord with an up-to-date development plan without delay.
- 3.3 Paragraph 38 of the NPPF requires Local Planning Authorities (LPAs) to approach decisions on proposed development in a positive and creative way. The NPPF encourages LPAs to work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
- 3.4 Additionally, paragraph 59 of the NPPF states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

- 3.5 The most relevant planning policies of the existing Local Plan and emerging draft Local Plan for determining this proposal are set out as follows;

CBC Local Plan, 2013-2028 - Core Strategy and Development Management Policies DPD	
DM12	Standards for New Residential Developments
SS1	Improving the Housing Offer
SS2	Sustainable Housing Growth
SS3	Housing Needs, Mix and Affordability
SS5	Provision and Access to Open Space and Green Infrastructure
T1	Improving Accessibility and Transport
ENV1	Flood Risk and Risk Management

ENV3	Biodiversity and Geodiversity
CBC Draft Local Plan 2021 – 2038 (subject to EIP and expected to be adopted in 2023)	
H5PU	Housing Allocations
H6PU	New Housing Development
H7PU	Housing Density and Mix
H8PU	Affordable Housing
DS2PU	Reducing the Impacts of Development on Climate Change
CO4PU	Sustainable Travel
N3PU	Bio Net Gain
N5PU	Protection of Watercourses
N9PU	Green Infrastructure

Figure 1 – Key CBC local plan and emerging local plan policies

- 3.6 The existing CBC Local Plan is set to be replaced by a new CBC Local Plan that is currently at draft publication stage and subject to forthcoming examination by a Planning Inspector. In light of the advanced draft stage of the new local plan and the expectation that this application shall be determined around the time of the tail-end of the new local plan adoption process, the application has been primarily formulated against the policies of the new Local Plan which carry significant weight. The new policies in most respects repeat the key principles of the existing, but are updated with new measures including bio-diversity net gain and reducing impact on climate change. The new policies also offer a precise requirement for affordable housing delivery quantum whereas the existing affordable policy remains vague. This is welcomed by Story Homes in terms of being able to propose plans against a clear planning policy focus.
- 3.7 The Cumbria Development Design Guide (adopted by Cumbria County Council in November 2017) is also a material planning consideration and provides guidance on matters including access and parking.
- 3.8 In summary, the considered key planning issues are;
- Principle of residential development
 - Housing mix and affordable housing
 - Design, Layout and Access.
 - Landscape and Visual Impact
 - Natural Environment inc biodiversity net gain and climate change
 - Drainage
 - Economic Benefit

- S106 Agreement

Principle of residential development

- 3.9 The Site is identified as a proposed housing allocation site for up to 120 units in the new draft CBC Local Plan under ref: H5PU. It is expected to be formally allocated by the end of Spring 2023 when the Local Plan is adopted;


Strategic Policy H5PU: Housing Allocations			
 <p>The following sites are allocated for housing over the Plan period 2021-2038. The yields identified are indicative only and alternative yields will be accepted where appropriate.</p>			
Settlement	Site Ref (SHLAA reference is shown in brackets)	Address	Indicative Yield (dwellings – based on 25dph unless otherwise stated)
Towns			
Whitehaven	HWH1 (WE032 & WE001)	Land at West Cumberland Hospital and Sneckyeat Rd	127
	HWH2 (WH011a)	Red Lonning and Harras Moor*	370 ⁶³
	HWH3 (WS013)	Land at Edgehill Park Phase 4	120
	HWH4 (WW018/WW022)	Land south and west of St Mary's School	60
	HWH5 (WW014)	Former Marchon Site North*	532
	HWH6 (WW019a)	Land South of Waters Edge Close	35

Figure 2 – Draft Copeland Local Plan Housing Allocations Policy

- 3.10 The Site is sandwiched between the south Whitehaven existing urban edge built form. The development of the site for housing is considered logical in the wider regeneration of this area. The proposal is considered acceptable in principle in accordance with key emerging policy.

Housing mix and affordable housing

- 3.11 The CBC Strategic Housing Market Assessment (SHMA) update report 2021 acknowledges a situation that to encourage growth and additional jobs, there needs to be appropriate and commensurate housing available to meet future needs. It also recognises that affordable need “is an important and pressing issue in the Borough”.
- 3.12 In terms of housing mix, the SHMA recognises that there are a range of factors which will influence the demand for different sizes of homes, including demographic changes, future growth in real earnings, economic performance and housing

affordability. The SHMA analysis is linked to the long-term (17-year) demographic change, taking account of both household changes and the ageing of the population. It concludes the following proposed mix of affordable and market homes;

	1-bedroom	2-bedrooms	3-bedrooms	4+- bedrooms
Market	5%	35%	40%	20%
Affordable home ownership	15%	45%	35%	5%
Affordable housing (rented)	30%	40%	25%	5%

Source: SHMA Update 2021

Figure 3, CBC SHMA update Oct 2021

- 3.13 Story Homes product, in comparison to its direct volume housebuilding competitors, offers a greater proportion of family sized houses, which have proven popular at the Wilson Howe and Edgehill Park previous phases. Notwithstanding tenure, this phase proposes 4.6% 2 bedroom, 41.3% 3 bedroom and 54.1% 4+ bedrooms. The affordable properties are split between 2 and 3 beds. The proposed mix is considered to reflect market demands in accordance with up-to-date sales evidence.
- 3.14 The existing CBC Local Plan is silent on precise affordable quantum requirements but is flexible according to viability, while the emerging local plan seeks for 10% quantum. Story Homes proposes 10 no. affordables (rounds up to 10%). The issue of viability remains prevalent at this site, given the low market revenues (in comparison to Story Homes other sites in Cumbria) and increasing and volatile standard build costs and abnormal costs. The proposed offer of affordable housing is subject to future review at a later date and following the full disclosure and agreement of s106 costs.

Design, Layout, Open Space and Access

- 3.15 The application is subject to a comprehensive Design and Access Statement (DAS) as prepared by 'Design by POD' urban design consultants, who have been integral to the masterplanning, design and success of Story Homes new housing in this area of south Whitehaven. The DAS is structured to first demonstrate the design policy basis and scheme evolution before moving on to justifying the detailed aspects of the design and layout. This Planning Statement does not attempt to repeat the DAS but rather reinforces the considered salient design, layout and access matters in summary form.
- 3.16 In respect to the key emerging policy basis, CBC draft local plan policy H6PU: New Housing Development seeks for design, layout, scale and appearance to be appropriate to the locality. It also seeks, amongst other things, for acceptable

residential amenity through no unacceptable overbearing impact and reduced street clutter where possible. Policy N9PU: Green Infrastructure seeks for a comprehensive, high quality network of green infrastructure, with opportunities for new connections and expanding existing green networks.

- 3.17 In summary, the layout is formed around the relatively flat developable area of the site. The proposed dwellings are of a scale and appearance in keeping with the existing Story Homes developments in the local area. The proposed built area avoids the steep slopes of the site on the eastern and southern sides of the site, as these are considered undevelopable. This in turn brings with it opportunity for well functioned green space within the undevelopable areas.
- 3.18 Phase 4 is separated from phase 3 by virtue of a green linear strip of open space along the western boundary. This shall provide a sense of arrival to this new phase.
- 3.19 The new phase is to benefit from a clear road hierarchy with the main principal road flanked on its north/eastern side by a grass verge to be tree lined, that loops back to the adjacent phase 3 to the west. The verge shall be adopted by the new estate management company, given the preference of the roads authority to not adopt such strips as part of the highway. In seeking to reduce street clutter and the dominance of cars, the main spine has been carefully designed with house types that limit the amount of front parking and instead favour side parking. This combined with the carefully designed landscaping scheme shall help provide for an attractive main street environment.
- 3.20 There are generous amounts of POS on the west, east and southern edges which will help provide a sense of openness with distant views from within the development outwards to the countryside and Lake District fells. There are many proposed street trees and generous amounts of front plot landscaping which will generally help reduce visual street clutter throughout;



Figure 4 – Example of plot landscaping mitigation against car dominance, Story Homes, St Andrew’s View, Thursby

- 3.21 At the southern built edge, housing is deliberately positioned facing outwards. This is to provide attractive public views looking into the development from the St Bees Road. On the eastern edge, dwellings are set back at the top of the hill to preclude overdominance on the Valley View Road residences at the bottom. A significant belt of new landscaping shall be carried out along the eastern and southern parts of the site. This shall provide robust screening between the site and Valley View Road properties, while creating a significant new green infrastructure corridor extending from the ravine in the south. Such open space and green infrastructure shall be maintained in perpetuity by the residents management company or sold to a (not for profit) charitable environmental organisation.
- 3.22 The existing public footpath that crosses the site shall remain on its current alignment. The path is to be formalised in terms of new level hard surfacing and new pedestrian connections onto this route are proposed from the new phase. The proposals also include new trim trail equipment positioned adjacent to the path, as a continuation from the existing trim trail provided alongside the path between Edgehill Park phases 2 and 3 to the west. A formal play area shall be erected in Edgehill phase 5 at c200m west from the site. This is expected to be available by the time Edgehill phase 4 is complete.
- 3.23 The public footpath shall connect the site to the local facilities at Greenbank to the east including the community centre and play area. An existing football pitch in Copeland Borough Council ownership is located at Greenbank, albeit it is in poor condition. Story Homes is willing to discuss with the Council how improvements can be made.
- 3.24 In terms as to wider transport impacts, the application is supported by a comprehensive Transport Assessment and Travel Plan. The NPPF 2021 refers that development should not create a severe highway safety impact. The assessment work has been scoped with the highway authorities and concludes that the development represents a sustainable development with safe and suitable access to the site for all users. The impacts of the proposed development traffic, in the context of the NPPF, are considered to not be severe. The Travel Plan shall help reinforce the ongoing sustainable travel choices including “Travel Choices” package. Story Homes consultants have rolled out such travel plan package across Story Homes developments and others throughout the UK. This includes details of engagement and support to new residents in making their travel choices. Amongst other things, the package includes local transport offers and discounts. The Travel Plan shall be an extension of the existing Travel Plan delivered across the previous permitted Edgehill Park phases.

Landscape and Visual Impact

- 3.25 The submitted Landscape and Visual Appraisal (LVA) identifies the key landscape and visual sensitivities of the Site, and provides recommendations to support the development.
- 3.26 The site is not located within any landscape designated areas. However, it is noted that there is an area designated as Landscape of County Importance approximately 360 south of the Site. There is also the Lake District National Park located circa 4 miles south east of the Site and Heritage Coast nearby to the west.

- 3.27 The LVA concludes that for the most part, the visual effects of the proposed development are considered to be negligible to minor, with a small number of moderate effects. The proposed layout has been laid out to retain existing mature boundary trees and significant new planting is proposed to mitigate against impact and enhance biodiversity.

Natural Environment including Biodiversity and Climate Change

- 3.28 Emerging CBC policy DS2PU – Reducing the impacts of development on Climate Change, states that the Council will support proposals where they make a positive contribution towards achieving the Cumbria wide goal of net zero carbon by 2037. This includes high quality design techniques and maximising the design and layout of buildings to improve energy efficiency, providing SUDS to avoid flood risk, contribution to environmental benefits including new woodlands etc and bio-net gain.
- 3.29 Draft policy CO4PU – Sustainable Travel, states that the Council will support developments which encourage the use of sustainable modes of transport. In particular and with reference to Policy CO7PU – Parking Standards, the Council seeks for 1 electric charging point per dwelling with off street parking.
- 3.30 Draft policy N3PU – Biodiversity Net Gain, in accordance with the NPPF, requires all new developments to provide a minimum of 10% net gain and should be delivered on site where possible.
- 3.31 In response to such environmental quality policies, Story Homes proposes modern insulation methods and materials in the build process. It currently offers performance values as follows;
- Ground floors – concrete slab with PIR insulation and screed achieving a U value of 0.16W/m2K;
 - External walls – cavity wall with injected glass mineral wool insulation achieving a U value of 0.28W/m2K, or cavity wall with PIR insulation achieving a U value of 0.28W/m2K;
 - Roofs – 500mm mineral fibre insulation quilt achieving a U value of 0.09W/m2K;
 - Windows – PVCU, double glazed, low e coating and argon filled achieving a U value of 1.40W/m2K; and
 - Doors – composite external doors construction achieving a U value of 1.40W/m2K
- 3.32 Story Homes dwellings are currently designed to have an air permeability of 5m3/hr@50pa, which represents a 50% improvement on current Building Regulations. This coupled with highly efficient water fittings and low energy light fittings, further reduces the energy requirement of our homes.

- 3.33 In accordance with the sustainable travel emerging policy, each and every new home on this phase shall be fitted with an electric charging point to enable off-street car charging.
- 3.34 The development shall connect to a new SUDS pond to complement and reinforce the strength of the existing green networks at Edgehill Park. The new SUDS is located immediately adjacent to the existing SUDS pond. The existing SUDS pond has begun to attract local wildlife including birds and shall be left undisturbed by the proposed development. The new SUDS shall be sized to latest standards to account for increases in surface water run off as a result of climate change and urban creep. It shall help preclude flooding downstream.
- 3.35 As demonstrated by the Urban Green Biodiversity Net Gain Assessment using the Biodiversity Metric 3.1, the proposal shall contribute to a gain of 158.84% for area habitats and 100% for linear hedgerow habitats. This shall be achieved amongst other things through the planting of 427 new trees including various native species. Such new planting and proposed pond shall help provide new biodiversity network links to the wider Edgehill Park site including the ravine, as well as helping to mitigate against the visual landscape impact of the new development.
- 3.36 To ensure that the habitats proposed as part of the post development design reach the condition detailed in the report, a Biodiversity Enhancement Management Plan is included in this application.

Drainage

- 3.37 In preparation to the development of this site, Story Homes has separately submitted a planning application for engineering / enabling operations in attempt to get a head start on drainage. This includes the formation of new land drains which shall help collect and divert surface water including existing overland flow to the local watercourse in a sustainable manner.
- 3.38 Emerging policy N5PU – Protection of Watercourses, requires new development to protect or improve the quality of surface and groundwater resources downstream. The proposed swale and SUDS and planting features shall help ensure clean water is released downstream. As demonstrated in the Flood Risk Assessment, the site is in Flood Zone 1 and there is shown to be a low flood risk identified because of the proposed development.
- 3.39 During construction, temporary surface water construction management measures shall be employed to help preclude contaminants from entering nearby water courses during the construction phase. Such measures shall be in addition to those currently being considered in Story Homes engineering application. The additional measures can be secured (with input from the EA and LLFA) by planning condition precedent as is normal planning practice.
- 3.40 A gravity foul water connection is proposed to connect a new foul sewer to the existing sewer on St Bees Road, via Gameriggs Road. This point of connection has been provisionally agreed by United Utilities. The exact route between Story Homes site and St Bees Road is to be confirmed and discussions are ongoing with interested land

parties (Home Group, Copeland Borough Council and Cumbria County Council) in this regard.

Economic Benefit

- 3.41 The proposed development shall bring with it significant economic benefits to the area. The House Builders Federation Housing Calculator estimates that a scheme for 109 new homes shall support the employment of 337 people including new direct and indirect jobs construction jobs. The development shall bring with it significant sums from Council Tax payments and New Homes Bonus to help support wider services. The economic benefit to be received from the development adds material weight to the approval of the application. The development shall help act as a catalyst for further regeneration in the local area including other uses such as employment and retail.

Section 106 Legal Agreement

- 3.42 In accordance with the statutory tests of the Community Infrastructure Regulations no. 122 and as reaffirmed in the National Planning Policy Framework, planning obligations may only constitute a reason for granting planning permission if they meet the following test;
- Necessary to make the development acceptable in planning terms
 - Directly related to the development; and
 - Fairly and reasonable related in scale and kind to the development
- 3.43 Appendix 2 outlines the proposed Heads of Terms which are subject to review with Copeland Borough Council following the statutory consultation period.

4) Planning Balance & Conclusion

- 4.1 The proposal for 109 new homes (including 10 no. affordable homes) and associated infrastructure is considered to represent a well considered, balanced and sustainable proposal that meets wide ranging aims of the emerging local plan, which carries with it great weight as a soon to be adopted planning policy.
- 4.2 The scheme assesses and proposes appropriate mitigation where required against landscape, biodiversity, drainage and climate change interests.
- 4.3 Story Homes proposal shall help contribute to the strategic growth as desired by Copeland Borough Council. There will be affordable homes provided on site to go to local people in need.
- 4.4 There are no policy conflicts or interests of acknowledged importance that would be harmed to an extent which would override the planning benefits arising.

- 4.5 It is respectfully asked that full planning permission to be granted subject to s106 legal agreement and planning conditions without delay.

Appendix 1

EIA Screening Opinion, 4th November 2021



Town and Country Planning Act 1990.

Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Screening Opinion under Regulation 6

Applicant:

Story Homes Limited

Background:

In a letter dated 22nd September 2021, Story Homes wrote to Copeland Borough Council as Local Planning Authority, for a screening opinion as to whether a Full Planning Application for a residential development of circa 115no. dwellings on land at Edgehill Park, Whitehaven is 'Environmental Impact Assessment (EIA) development' and if an Environmental Statement is required.

In accordance with Regulation 6 of the above Regulations, Copeland Borough Council as Local Planning Authority is required to adopt a Screening Opinion. This is a written statement of opinion as to whether the proposed is 'EIA Development', being likely to have a significant effect on the environment by virtue of the nature of the development, its size and location.

Drawings/Documents:

This Screening Opinion has been considered against the information submitted on behalf of Story Homes, which comprises:

- Letter dated 22nd September 2021; and,
- Location Plan – Drawing No. 54D-STP 002.

Enquiry Site

The Enquiry Site comprises a 4.7688ha parcel of agricultural land located to the east of the approved residential development known as Edgehill, Whitehaven.

The land is enclosed by existing residential development to the north; existing residential development and a collection of small buildings to the east; the approved and partially

complete residential development of Edgehill Park to the west; and, both a small farmstead/dwelling and SuDS pond to the south.

Description of Proposal:

It is confirmed that the proposed comprises a residential development of circa 115no. dwellings with associated infrastructure, including roads, sewers and open space.

It is confirmed that the proposal is intended to connect surface water to the existing SUDS pond adjacent St Bees Road.

Reference is made in the letter dated 22nd September 2021 to an enclosed plan showing the intended development area, road structure and open space; however, no such plan has been provided.

Edgehill Park:

Planning Application Ref. 4/13/2235/001 - Outline planning permission for the erection of 431 (approx.) dwellings, land reserved for primary school and associated ancillary open space and infrastructure and approval in full for matters in association with 139 dwellings to the south of the site with access, pedestrian bridge, suds features & associated open spaces and infrastructure – Approved subject to planning conditions and Section 106 Agreement in December 2013.

Planning Application Ref. 4/13/2235/001 was the subject of a Screening Opinion and Scoping Opinion prepared by Copeland Borough Council under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Planning Application Ref. 4/13/2235/001 was supported by an Environmental Statement under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Integral or Independent Developments:

It is necessary to consider if the proposed development is an integral part of the partially completed Edgehill Park development (Judgment in the case of R v Swale BC ex parte RSPB [1991] 1PLR 6) or whether the proposed development and the partially completed Edgehill Park development could proceed independently (R (Candlish) v Hastings Borough Council [2005] All ER (D) 178 (Jul); Baker v Bath & North East Somerset Council [2009] All ER (D) 169 (Jul)).

Story Homes have confirmed via email that a pedestrian link and vehicle link would exist between Phase 3 of the partially completed Edgehill Park development approved under Planning Application Ref. 4/13/2235/001 and proposed development.

The letter dated 22nd September states that it is intended to connect surface water to the existing SUDS pond adjacent St Bees Road.

The proposed development is located on a separate parcel of land to the partially completed Edgehill Park development and did not form part of the Planning Application Ref. 4/13/2235/001 or the area defined in the South Whitehaven Plan SPD March 2013.

It is clear that the partially completed Edgehill Park development could be completed independently of the proposed development as demonstrated by its on-going construction.

There are clear proposed functional linkages between the partially completed Edgehill Park development and the proposed development; however, these are what would be anticipated and reasonably required in planning terms to create an integrated, sustainable and accessible community in South Whitehaven. Surface water drainage could reasonably be secured via separate means from the existing SUDS pond adjacent St Bees Road.

In the context of the above, it is concluded that the partially completed Edgehill Park development and the proposed development are not integral to one another and could proceed independently.

Recent Planning Application History of Enquiry Site:

None.

Assessment:

1. Does the proposal constitute Schedule 1 Development?

No.

2. Does the proposal fall within one of the categories of development described in Column 1 of Schedule 2?

Yes.

Part 10.(b) - Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

3. Does the development exceed the threshold in Column 2 of Schedule 2?

10.(b) of Column 2 of Schedule 2 of the 2017 Regulations to states the following:

*“(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
(ii) the development includes more than 150 dwellings; or
(iii) the overall area of the development exceeds 5 hectares.”*

No. The Enquiry Site extends to 4.7688ha and the proposed comprises a residential development of circa 115no. dwellings with associated infrastructure, including roads, sewers, open space.

The proposed development does not therefore comprise Schedule 2 development as defined in the 2017 Regulations.

4. Is the site partly or wholly within a “Sensitive Area” as defined in Regulation 2(1)?

Regulation 2(1) states the following:

“sensitive area” means any of the following—

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(a);*
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(b);*
- (c) the Broads(c);*
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(d);*
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(e);*
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(f) as confirmed by the Secretary of State;*
- (g) a European site;”*

No. The site is not located in a “Sensitive Area” as defined in Regulation 2(1).

The proposed development is not therefore in a location requiring screening under the 2017 Regulations.

5. Screening Opinion:

The proposed development does not comprise Schedule 2 development as defined in the 2017 Regulations.

The Enquiry Site is not located in a “Sensitive Area” as defined in Regulation 2(1).

It is therefore the opinion of Copeland Borough Council as Local Planning Authority that the proposed development does not constitute Environmental Impact Assessment development.

Case Officer: Chris Harrison

Date: 04th November 2021

Appendix 2

S106 Heads of Terms

S106 Heads of Terms

1. Story Homes anticipates the following requirements to be secured by means of s106 planning obligation;
 - Affordable Housing Delivery Scheme – a scheme to secure the timing and tenure restrictions of the proposed 10 x affordable housing units.
 - Travel Plan Monitoring Contribution – as it standard for schemes of this size, it is expected that a contribution shall be required to pay for the County Council monitoring of the live Travel Plan with the aim of helping to reduce vehicle movements and promote sustainable transport modes.
2. Any other requirements i.e education and highways shall need to be demonstrated by evidence in accordance with CIL Regulations 123 and balanced against the overall viability of the scheme.