

Copeland Borough Council

Cleator Moor Innovation Quarter
Leconfield Industrial Estate and Adjacent Land

Planning Statement



June 2022

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For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This Planning Statement has been prepared by Avison Young on behalf of Copeland Borough Council ('the Applicant') to assist Copeland Borough Council ('the Council' or 'CBC') in its consideration of the accompanying outline planning application for a mixed-use development at Leconfield Industrial Estate and adjacent land, Cleator Moor, Cumbria ('the Site').
- 1.2 The masterplan proposals will deliver the Cleator Moor Innovation Quarter (CMIQ), which will host the Innovation and Solutions Hub (ISH) enterprise campus. The CMIQ will utilise a business cluster approach to diversify the west Cumbrian economy away from dependency on the Sellafield site by building upon existing knowledge and engineering capabilities in the nuclear and clean energy sectors.
- 1.3 The proposed description of development is as follows:

"Provision of up to 44,350 sqm (GEA) floorspace for light industrial, general industrial and storage & distribution (Class E(g), B2, B8 uses), Hotel (Class C1) and Student Accommodation (Sui Generis) with ancillary food/beverage (Class E(b)), education and community facility uses (Class F1(a & e)) with internal accesses, parking, service yards, attenuation basins, electricity substations and associated infrastructure, earthworks and landscaping."

- 1.4 This Statement examines the application against section 38(6) of the Planning and Compulsory Purchase Act (2004). It discusses how the development proposals conform to local and national planning policy requirements.

Environmental Impact Assessment

- 1.5 Under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 the Development Proposals were subject to an Environmental Impact Assessment (EIA) Screening Opinion from the Council.
- 1.6 In the Screening Response dated 22 December 2021, the Council sets out that in its opinion, having considered the selection criteria in Schedule 3 of the 2017 Regulations, the proposed development would not have significant effects on the environment. The Council is therefore of the opinion that the development is not EIA development within the meaning of the 2017 Regulations and subsequently does not require submission of an Environmental Statement.

Application Documentation

- 1.7 This Statement should be read alongside the submitted plans and drawings, and the following supporting documentation:

- Application Forms (Avison Young);
- Air Quality Assessment (Miller Goodall)
- Design and Access Statement (NORR)
- Ecological Appraisal (Tetra Tech)
- Flood Risk Assessment and Drainage Strategy (BGP)
- Geo Environmental Desk Study (Solmek)
- Landscape and Visual Impact Assessment (ONE Environments)
- Landscape Strategy (One Environments)
- Noise Assessment (Miller Goodall)
- Residential Amenity Assessment (ONE Environments)
- Statement of Community Involvement (Avison Young)
- Transport Assessment and Travel Plan (Tetra Tech)
- Tree Survey (Barnes Associates)

Statement Structure

1.8 This Statement is structured as follows:

- Chapter 2 - Site and Surrounding Area
- Chapter 3 – The Development Proposals
- Chapter 4 – Statement of Community Involvement
- Chapter 5 - Planning Policy Context
- Chapter 6 – Planning Assessment
- Chapter 7 – Conclusion

2. Site and Surrounding Area

Cleator Moor

- 2.1 Cleator Moor is situated in the north of the borough of Copeland in Cumbria. It lies to the west of the Lake District National Park and approximately 5km south-east of Whitehaven. The town is served by the B5295 which links to the A595 – one of the key primary routes in Cumbria connecting Cleator Moor to the towns of Workington, Whitehaven and Maryport and beyond to Carlisle to the north and Barrow to the south.

The Application Site

- 2.2 The Site occupies a prominent central location in Cleator Moor, approximately 600m to the north west of the town centre.
- 2.3 The Site extends to 34.9Ha (86.2 acres) and comprises of three land parcels; Area 1, Area 2 and Area 3 illustrated in Figure 1.



Figure 1: Application Site. CMIQ area (red) and development areas (blue)

Area 1

- 2.4 Area 1 comprises of the existing Leconfield Industrial Estate which extends to approximately 17.6ha.

- 2.5 The Industrial Estate is irregular in shape and is accessed via the B5295 'Leconfield Street' at its southern boundary, informal foot/cycle access is also achieved via the Coast to Coast (C2C) cycle route which separates Area 1 from Area 2. Reflecting its central location the wider area is characterised by a mix of uses including residential to the north, west and south, retail and leisure uses in the town centre to the south-east and agricultural to the north (comprising Area 3).
- 2.6 Leconfield Industrial Estate has experienced an extended period of decline, with large areas of the Industrial Estate in a poor state of repair with approximately half of the structures on the Estate demolished over the past decade. Currently Leconfield Industrial Estate accommodates approximately 20 employment units of varying sizes of standard light industrial construction, including brick, corrugated iron, and prefabricated steel frame. Ground cover on the site comprises a mosaic of tarmac, concrete floor slabs from demolished buildings and areas of grass/scrub land. Trees are present at the site's boundaries and peppered across the Industrial Estate's south-eastern extent.

Area 2

- 2.7 Area 2 is located to the east of Leconfield Industrial Estate beyond the C2C cycle path. It comprises of approximately 4ha of open grassed land adjacent to Cleator Moor Celtic Football Club and Fellview Health Centre. Residential properties bound the site to the north-west and informal allotment gardens are located to the south.
- 2.8 The site is currently accessed via an unnamed road from Birk's Road which serves Cleator Moor Celtic Football Ground.
- 2.9 The topography of the site is predominantly level and trees are present at the site's western and southern boundaries.

Area 3

- 2.10 Area 3 is an irregular shaped parcel of land to the north of Leconfield Industrial Estate, from which it is separated by a former railway line, now public footpath and a small watercourse, Nor Beck. It extends to approximately 13.3ha and comprises of several fields, currently under arable production with trees and hedgerows delineating field boundaries.
- 2.11 Vehicular access is via the B5294 'Bowthorn Road' at its western boundary, with further informal access available via field gates from Birks Road at its eastern boundary.
- 2.12 Ground levels at the site vary rising generally from a low point in the southwest of the site to the east.

- 2.13 The Environment Agency flood map for planning shows the southwest portion of the site along the extent of Nor Beck is at high risk from surface water flooding.

Key Technical Considerations

- 2.14 With regards to technical considerations the Site area:
- Does not contain any Listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields or conservation areas – although it is acknowledged that the Cleator Moor Conservation Area is located c.300m (as the crow flies) from the Site at its closest point;
 - According to the Environment Agency Flood Map, Area 1, Area 2 and northern half of Area 3 are within Flood Zone 1 which indicates a low probability of flooding and is therefore suitable to accommodate development from a flood risk perspective. The southern extent of Area 3 is identified as Flood Zone 3, high risk of flooding, and as such development should be directed away from this area in the first instance.
 - Contains no statutory or non-statutory ecologically designated sites there are however, two statutory designated sites within 2km:
 - SAC River Ehen, 1.3km distance
 - SSSI River Ehen, 1.3km distance
 - Is not covered by any Tree Preservation Orders.
 - The site is not within an Air Quality Management Area.
 - The Site is not in a High Landscape Value Area or within an Area of Outstanding Natural Beauty.

3. Background to the Proposals

Why the CMIQ is Needed

- 3.1 Sellafield has driven the Copeland borough economy for 70 years with the result that 60% of economic activity in Copeland is related directly or indirectly to Sellafield, in terms of both jobs and Gross Value Added (GVA).
- 3.2 The challenges for the future of Copeland Borough's economy have been brought into focus by:
- The end of spent fuel reprocessing at Sellafield;
 - The Moorside new reactor build project not proceeding.
- 3.3 The end of reprocessing will mark a key milestone for Sellafield and Copeland Borough. Sellafield will continue to manage spent fuels and nuclear materials, but the focus will shift to cleaning-up the site, and this will lead to slow but inevitable reduction in its economic activity. An Oxford Economics report¹ on the economic impact of Sellafield identified that Copeland is expected to suffer a large contraction in employment and reduction in GVA growth as decommissioning progresses. The Oxford Economics Report identifies that this contraction is anticipated to be most acute in Cleator Moor, which already faces significant challenges to growth, due to the following factors:
- *Lack of employment opportunities*: significantly lower jobs densities than other areas in the Borough with a contracting business base and reducing business start-ups. There is also a high dependency on the manufacturing sector, accounting for over a third of economic output with other sectors including professional, scientific and technical experiencing a significant contraction (-35% over 3 years) in numbers. In summary, the town needs more jobs and a reduced dependency on Sellafield.
 - *Skills profile and life chances*: lower levels of productivity than Cumbrian and English averages, resulting in lower economic output for (GVA per job). The biggest drag on productivity is a persistent skills gap, which also impacts on life chances, income and health and wellbeing. A strong representation of mid and low range occupations such as process plant and machine operatives, increasing exposure to the impact of automation.
 - *Entrenched deprivation and poor health and well-being*: pockets of severe deprivation reflected in poorer standards of health, education, household incomes, and benefits dependency. Areas of the town are in the top two deciles for multiple deprivation nationally. Health outcomes are

¹ The Economic Impact of Sellafield", Oxford Economics, 2017 Accessed via:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730958/The_economic_impact_of_Sellafield_June_2017_Oxford_economics.pdf

driving deprivation and access to health and wellbeing infrastructure is amongst the weakest in the country.

- *A struggling town centre*: declining footfall and spend with increasing commercial vacancy rates – at 31% (UK average of 11%). Low market demand for town centre units reflecting poor accessibility and low-quality public realm, resulting in poor perceptions of the centre, discouraging private sector investment, and exacerbating a long-term decline in aspirations, particularly amongst the younger population.

3.4 There is therefore a clear and immediate need to act to counter this forecast economic decline.

3.5 The Industrial Solutions Hub (ISH) project is an economic initiative led by Copeland Borough Council with the support of key stakeholders including the Nuclear Decommissioning Authority (NDA), Sellafield Ltd, Cumbria Local Enterprise Partnership (CLEP) and private sector supply chain partners. The key objective is to create a diverse and sustainable economy for West Cumbria, one which is less dependent on Sellafield.

3.6 The ISH programme's objective is to incentivise clean energy supply chain organisations to locate, grow, export, and diversify from West Cumbria. This is to be achieved through the development of a new business cluster to provide an economically competitive advantage to firms located within West Cumbria.

3.7 The 'Cleator Moor Innovation Quarter' (CMIQ) will host a new enterprise campus and innovation hub providing bespoke accommodation that will be a focus for collaboration, innovation and diversification across the Cumbrian nuclear and engineering sectors. The CMIQ will facilitate the creation of a networked cluster of public, private and academic organisations, growing, diversifying and exporting products and services from Cumbria into new nuclear and non-nuclear markets.

3.8 Investment in CMIQ will remove barriers to local job creation, raise skills levels and aspiration, attract private sector investment through cluster development and connect local residents to opportunities. It will maximise the potential of the ISH, accelerate and enhance change on Leconfield Industrial Estate and expand investment and benefits beyond.

3.9 Following an extensive search and review of potential locations across the Borough, the appropriate location for this new nuclear and clean energy cluster has been identified as Leconfield Industrial Estate and adjacent land at Cleator Moor. Cleator Moor and Leconfield Industrial Estate was chosen for a number of factors:

- Leconfield Industrial Estate is in ownership of Copeland Borough Council, thereby removing a number of potential delivery obstacles
- The site already has permission for a range of employment uses to take place
- It is a suitable size to kick-start the high-quality campus/business cluster vision.
- It is an established employment site with existing rent-paying tenants.
- It is strategically located in proximity to established specialist nuclear centres of Sellafield, Westlakes and Moorside.
- The possibility to develop adjacent land already owned by the Council and allocated for development in the Local Plan (Area 2) to accommodate future development phases. There is also the potential for further expansion on to land to the north (Area 3) if required for additional future phases, this will only come forward however once Leconfield Industrial Estate is full and if there is demonstrable market demand.
- Development will significantly improve the built quality of the Industrial Estate which is currently in a very poor state.
- It is located centrally within Cleator Moor close to the town centre and allows for maximised regeneration and revitalisation benefits for the town.

4. Masterplan Development Proposals

4.1 The application seeks outline planning permission for a mixed-use development at Leconfield Industrial Estate, Cleator Moor and adjacent land parcels to the north and east. Scale and access are sought for approval with all other matters reserved.

4.2 The proposed description of development is as follows:

"Erection of 44,350 sqm light industrial, general industrial and storage & distribution industrial units (Class E(g (ii&iii)), B2, B8), Hotel (Class C1) and Student Accommodation (Sui Generis) with ancillary food/beverage (Class E(b)), education and community facility uses (Class F1(a & e)) with internal accesses, parking, service yards, attenuation basins, electricity substations and associated infrastructure, earthworks and landscaping."

4.3 The proposed masterplan development comprises of the following key features. Further details can be found in the accompanying Design and Access Statement prepared by Norr.

Quantum, Use and Amount

4.4 A business cluster is a geographic concentration of interconnected companies and institutions in a particular field. Clusters are considered to increase the productivity with which companies can compete, nationally and globally, through shared knowledge, innovation, and specialised supply chain capabilities.

4.5 Consequently, a range of complimentary and supporting uses are sought to be accommodated on the site allowing full flexibility to support the generation and function of the proposed nuclear and clean energy business cluster.

4.6 Existing buildings on Leconfield Industrial Estate are proposed to be retained. A total of 44,350sqm (477,379sqft) (GEA) new floor space is proposed across the Site, disaggregated across the three CMIQ Areas as follows:

Area	Quantum (GEA)	Use
1	10,640sqm (114,500sqft)	B2 General Industrial B8 Storage and warehousing E(g(ii)) Research and Development E(g(iii)) Industrial Processes With ancillary: Class F1(a & e) education, community and Class E(b) food/beverage

2	5,840sqm (62,830sqft)	E(g(ii)) Research and Development E(g(iii)) Industrial Processes C1 Hotel Sui Generis 'student accommodation'
3	27,870sqm (300,000sqft)	B2 General Industrial E(g(ii)) Research and Development E(g(iii)) Industrial Processes

- 4.7 Each of the three CMIQ Areas has been segregated into individual development plots to allow for a flexible and phased delivery as need and demand arises. These development plots and their proposed uses are identified on accompanying masterplan drawings: DR-A-90002 'Proposed Site Plan' and DR-A-90003 'Proposed Land Use'.
- 4.8 The total new floorspace proposed has been derived following thorough investigation of ground conditions, environmental constraints, landscape impact and existing structures to be retained. It represents an efficient and viable quantum to support the CMIQ business cluster vision and allows for sufficient flexibility to accommodate future occupants needs as they arise.

Scale

- 4.9 Building heights will vary across the CMIQ area and across individual plots, reflecting the sensitivity of each plot's surroundings, topography, neighbouring properties, and natural features to minimise visual and amenity impact.
- 4.10 Masterplan drawing No. DR-A-90009 'Proposed Vertical Limitation' illustrates the proposed build height parameters for the Site on an individual plot basis. A maximum building height of 18 metres at Areas 1 and 3, and maximum build height of 15m on Area 2 is proposed, generally build heights are lower at Site boundaries in response to neighbouring properties and highest towards centre.

Design and Layout

- 4.11 The masterplan layout as shown on drawing no. DR-A-90002 has been designed to promote an attractive campus environment that sits within a landscape-led setting that is well-connected to the town.
- 4.12 The masterplan is outline at this stage and therefore the detail of the design and appearance will be addressed at Reserved Matters stage. However, a Design Guide has been created to establish a series of strong urban design principles which will assist with achieving a place with integrity and cohesion. The design guide can be used to help assess detailed design proposals at reserved matters stage.

Access and Parking

- 4.13 The Site has been developed with principles of a safer, direct and legible movement hierarchy. Whilst detailed layouts will come forward under Reserved Matters application the proposals include the improvement of pedestrian and cycle access across the site and between adjacent areas of the town. The aim is to reduce the dominance of vehicles thereby improving the environment for pedestrians and cyclists.
- 4.14 With regards to proposed vehicular access:
- Area 1 - the existing junction arrangement with Leconfield Street will be utilised.
 - Area 2 – new vehicular access will be provided via the existing unnamed road from Birks Road that currently services Cleator Moor Celtic Football Club.
 - Area 3 - new vehicular access is proposed to Area 3, via Bowthorn Road with secondary emergency vehicle only and pedestrian/cycle access to be provided with Birks Road at the Sites eastern boundary.
- 4.15 The proposals include the introduction of new pedestrian and cycle routes across the three areas improving legibility and permeability of the Site and helping to connect the Site with the wider town. Existing footpaths will also undergo renewal ensuring that the site is accessible and navigable by all users.
- 4.16 Parking will be provided in accordance with County Council guidelines and will be delivered within development plots and in appropriately located areas where in curtilage provision is not possible. The illustrative masterplan shows provision for up to 1,147 car parking spaces across the Site. There are at present 196 existing car parking spaces within Area 1, overall, therefore an additional 951 spaces are proposed across the Site.

Landscaping and Public Realm

- 4.17 The detailed landscaping scheme will be determined at Reserved matters stage, however the landscape design seeks to achieve cohesive links between Areas 1, 2 and 3 and adjacent areas of Cleator Moor. The Design and Access Statement sets out the key landscaping design principles for the Site which will be taken into consideration during detailed design stages. These are detailed below:
- Maximised retention of existing landscape features and mature trees;
 - New trees planted along routes to reinforce green links, provide welcoming and sheltered areas for users and help aid legibility across the Site;

- Proposed SuDS features to enhance water management capabilities and enrich biodiversity;
- Primary pathways of sufficient width to permit combined cycle and footways;
- Meadow planting to help limit frequency of grass cutting and enhance biodiversity; and
- Introduction of brown roofs on new buildings where possible to enhance biodiversity.

5. Planning Policy

Planning Policy Context

Legislative Context

- 5.1 The Town and Country Planning Act (1990) and Planning and Compulsory Purchase Act (2004) are relevant to the consideration of this application.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Policy

- 5.3 The National Planning Policy Framework (NPPF) (July 2021) sets out the Government's planning policies for England and how these should be applied and is a material consideration in the determination of the accompanying planning application. The most pertinent policies relating to the principle of development at the site are set out below.

The Presumption in Favour of Sustainable Development

- 5.4 The NPPF outlines that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three objectives which are interdependent and need to be pursued in mutually supportive ways:
- Economic objective – to help build 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, innovation and improved productivity;
 - Social objective – to support strong, vibrant and healthy communities, by providing a range of homes and by fostering well-designed, beautiful and safe places, with accessible services and open spaces; and
 - Environmental objective – to protect and enhance the natural, built and historic environment, improving biodiversity, minimising waste and adapting to climate change.
- 5.5 Paragraph 9 confirms that these objectives should be delivered through the implementation of Plans and the application of policies in the NPPF; however, they are not criteria against which every decision can or should be judged.
- 5.6 Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development”.

5.7 For decision-taking this means:

*“c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. 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.”*

Building a Strong Competitive Economy

5.8 Paragraph 81 states that planning policies and decisions should help create conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

5.9 Planning policies should:

*“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.” (Paragraph 82)*

5.10 Paragraph 83 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors. Including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Ensuring the vitality of Town Centres

5.11 Paragraph 86 sets out that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

“a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites."

- 5.12 Paragraph 87 states that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in accordance with an up-to-date plan and also states that:

"Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered."

- 5.13 Paragraph 88 then identifies that:

"When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored."

- 5.14 Paragraph 90 indicates that, where an application fails to satisfy the sequential test it should be refused.

Annex 2: Glossary of the NPPF defines 'edge of centre' as

"a location within 300 metres of a town centre boundary" and confirms that "in determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances". 'Out of centre' locations are defined as those which are "not in or on the edge of a centre but not necessarily outside the urban area".

- 5.15 The Annex also provides a list of main town centre uses, which includes hotel uses.

Promoting Healthy and Safe Communities

- 5.16 Paragraph 92 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

Promoting Sustainable Transport

5.17 The NPPF advises in paragraph 104 that:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.” (paragraph 102)*

5.18 Paragraph 110 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- “a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

5.19 Within this context, applications for development should:

- “a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

- 5.20 The NPPF requires all developments which generate significant amounts of movement to provide a Travel Plan, and Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed (paragraph 113).

Achieving Well-Designed Places

- 5.21 The NPPF places great weight on achieving well-designed places. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 126). Paragraph 130 states that planning policies and decisions should ensure that developments:

*“ a) 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;
b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;
and
f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

- 5.22 Paragraph 131 recognises that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined.
- 5.23 Paragraph 132 states that design quality should be considered throughout the evolution and assessment of proposals. It recommends that applicants work closely with those affected by their proposals to evolve designs that take into account the views of the community. “Applications that can demonstrate early, proactive and effective engagement with the community should be looked upon ‘more favourably than those that cannot.”
- 5.24 Paragraph 134 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Planning for Climate Change

- 5.25 New development should be planned in ways that avoid increased vulnerability to the range of impacts arising from climate change and can help reduce greenhouse gas emissions such as through its location, orientation or design (Paragraph 154) and it should comply with local requirements for

decentralised energy supply and take account of landform, layout, massing and landscaping to minimise energy consumption (Paragraph 157).

Planning and Flood Risk

- 5.26 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 159).

Conserving and Enhancing the Natural Environment

- 5.27 NPPF Paragraph 174 notes that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity value whilst minimising impacts on and providing net gains for biodiversity.

Ground Conditions and Pollution

- 5.28 Planning decisions should ensure that the site is suitable for its proposed use taking account of ground conditions and risks arising from land instability and contamination and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation) (Paragraph 183).
- 5.29 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

- 5.30 Development will need to adhere to relevant limit values of national objectives for pollutants taking into account Air Quality Management Areas and Clean Air Zones (Paragraph 186).

Conserving and Enhancing the Historic Environment

- 5.31 NPPF paragraph 189 makes clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 194 goes on to explain that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The

level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

National Planning Practice Guidance

5.32 The NPPG complements the NPPF in terms of how the NPPF should be implemented in practice. The NPPG can be a material consideration in the decision-making process. The following categories of the NPPG are considered relevant in the consideration of this proposal:

- Design: Process & Tools
- Determining a Planning Application
- Effective Use of Land
- Flood Risk and Coastal Change
- Land Affected by Contamination
- Natural Environment
- Open Space, Sports & Recreation Facilities, PROW & Local Green Space
- Planning Obligations
- Renewable & Low Carbon Energy
- Travel Plans, Transport Assessments & Statements
- Use of Planning Conditions
- Viability
- Water Supply, Wastewater & Water Quality

Local Planning Policy - Adopted

5.33 The statutory development plan for the application comprises the policies of the Copeland Local Plan 2013-28 Core Strategy and Development Management Policies (adopted 2015) ('the Core Strategy') and remaining policies 'saved' from the preceding Copeland Local Plan 2001-2016 (adopted 2006) ('the 2006 Plan').

5.34 The following policies of the Core Strategy have been identified as being relevant to the Proposals:

- Policy ST1: *Strategic Development Principles* sets out the fundamental principles that will guide development management in the Borough.

- Policy ST2 *Spatial Development Strategy* seeks to direct development to the most sustainable locations – the main settlements - whilst indicating the scale of development that will be encouraged in other areas of the Borough.
- Policy ST3 *Strategic Development Priorities* sets out the key locations that the Council sees as its strategic development priorities, the fulfilment of which is essential for realising the key objectives for growth and regeneration in the Borough.
- Policy ER4 *Land and Premises for Economic Development* sets out that the Council will maintain an adequate supply of land and floorspace for economic development.
- Policy ER5 *Improving the Quality of Employment Space* sets out how the Council will improve the quality of Copeland's employment land portfolio by: prioritising high-quality office provision within Whitehaven and Key Service Centres and by promoting investment in the public realm at specific employment sites, and working with owners to achieve improvements more generally throughout industrial areas.
- Policy ER6 *Location of Employment* identifies that employment development will be supported in Whitehaven and Key Service Centres (i.e., Cleator Moor).
- Policy ER7 *Principal Town Centre, Key Service Centres, Local Centres and other service areas* identifies the roles and functions development will be required to meet in the different settlements. It identifies Cleator Moor, Egremont and Millom as Key Service Centres where development is required to protect and where possible enhance the services and facilities provided.
- ER9 *Key Service Centres, Local Centres and other smaller centres* defines the Cleator Moor town centre boundary and sets out that retail and service development that promotes the vitality and viability of Key Service Centres, and is consistent with the spatial strategy, will be supported.
- Policy ER11 *Developing Enterprise and Skills* states that the Council will work with its partners to promote and develop the skills and employment opportunities of local people.
- Policy T1 *Improving Accessibility and Transport* supports transport improvements that maximise accessibility for all modes of transport but particularly by foot, cycle and public transport.
- Policy ENV1 *Flood Risk and Risk Management* ensures that development in the Borough is not prejudiced by flood risk.
- Policy ENV3 *Biodiversity and Geodiversity* seeks to protect internationally, nationally and locally designated sites from harm or loss and seeks where possible their enhancement.
- Policy ENV5 *Protecting and Enhancing the Borough's Landscapes* seeks to protect all landscapes from inappropriate change by inappropriate development.

- Policy DM10 *Achieving Quality of Place* requires a high standard of design and the fostering of 'quality places' through encouragement of mixed-uses, positive response to local character, appropriate scale and orientation of buildings, consideration of general amenity and incorporation of art.
- Policy DM11 *Sustainable Development Standards* requires development proposals reach high standards of sustainability by requiring on-site renewable energy generation, maximised passive solar gain, construction materials and incorporation of Sustainable Urban Drainage Systems.
- Policy DM22 *Accessible Developments* requires development proposals to be accessible to all users prioritising pedestrian and cycle needs, encouraging public transport and manages traffic access and speeds without resorting to engineering measures and incorporates appropriate parking standards.
- Policy DM24 *Development Proposals and Flood Risk* requires a Flood Risk Assessment (FRA) if there is any risk of flooding. Development will not be permitted where it is found that: A There is an unacceptable risk of flooding; or B The development would increase the risk of flooding elsewhere.
- Policy DM25 *Protecting Nature Conservation Sites, Habitats and Species* requires all development to protect the biodiversity value of land and buildings and maximise opportunities for conservation, restoration, enhancement and connection of natural habitats and creation of habitats for species listed in UK and Cumbria Biodiversity Action Plans. All development proposals must take into account any likely significant effects on the internationally important sites both within the Borough and within a 20km radius of the Borough boundary as well as those that are hydrologically linked to the development plan area.
- Policy DM26 *Landscaping* sets out that all development proposals will be assessed in terms of their potential impact on the landscape.
- Policy DM28 *Protection of Trees* requires an arboriculture assessment as to whether any trees are worthy of retention and protection and stipulates that any trees removed are replaced at a minimum ratio of 2:1.

5.35 The following 'saved' policies of the 2006 Local Plan have also been identified as being of relevance:

- EMP1 *Employment Land Allocation* designates land for employment use. Within these areas development for or changes of use to employment uses will be permitted provided that other plan policy requirements are met. As illustrated in Figure 2 part of Leconfield Industrial Estate and 5.3Ha of adjacent land to north; 'Leconfield Extension' land is identified as a 'Local Employment Site' where Uses B1, B2 and B8 are considered acceptable in principle (purple areas).

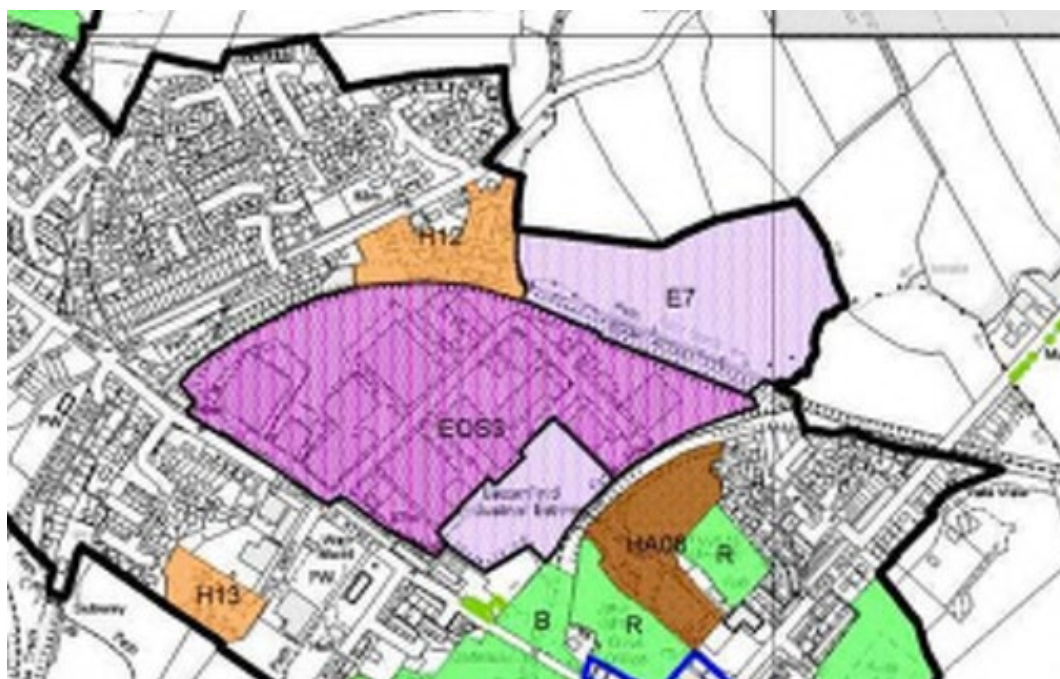


Figure 2: Excerpt from Copeland Local Plan 2013-28 and 'saved' policies Proposals map.

- EMP3 *Employment Opportunity Sites* identifies the built extent of Leconfield Industrial Estate as an employment opportunity site suitable for a wide range of employment uses (Class B1, B2 and B8) but may also be suitable to accommodate non-employment uses subject to other policy considerations. Illustrated in pink at Figure 2.
- HSG2 *New Housing Allocations* identifies land comprising Site 2 to accommodate new housing development (Reference HA8 Birks Road) with capacity for approximately 48 homes, to be delivered across 2006-2011. Illustrated in brown at Figure 2.

Emerging Planning Policy

- 5.36 Copeland Borough Council are at an advanced stage in the process of preparing a new Local Plan which once adopted will replace the Core Strategy and saved policies.
- 5.37 The final draft, the Publication Draft of the Copeland Local Plan 2021-2038 was consulted on between January and March 2022. It is anticipated that the Publication Draft of the Local Plan will be submitted to the Secretary of State for Examination mid-2022 with its adoption anticipated in Spring 2023.
- 5.38 In accordance with the requirements of NPPF Paragraph 48, given the relatively advanced stage of its preparation the draft policies of the Copeland Local Plan 2021-2038 publication Draft Plan can be attributed due weight in the determination of planning applications.
- 5.39 The following key Publication Draft policies have been highlighted as being of relevance to the proposals:

- Strategic Policy DS1PU *Presumption in favour of Sustainable Development* states that the Council will take a positive approach to sustainable development by approving applications without delay where they accord with the Development Plan (and where relevant, any neighbourhood plan), unless material considerations indicate otherwise.
- Strategic Policy DS3PU *Settlement Hierarchy* directs development to the four towns of Whitehaven, Cleator Moor, Egremont and Millom as the most sustainable parts of the borough as they contain a high number and a broad range of services, as well as greater infrastructure to support further development. Cleator Moor is identified as a second-tier settlement, a 'Key Service Centre', which is to be the focus for town centre developments, employment development and medium scale housing extensions, windfall and infill development.
- Strategic Policy DS4PU *Settlement Boundaries* identifies the development limits of settlements in the Borough within which development is acceptable subject to other material considerations.
- Strategic Policy E4PU *Cleator Moor Innovation Quarter at Leconfield* allocates Leconfield Industrial Estate and adjacent land to accommodate the Cleator Moor Innovation Quarter business cluster. The primary uses on the Cleator Moor Innovation Quarter development will be limited to Use Class B2, Use Class B8 and Use Class E(g) only. Community infrastructure, community facilities and ancillary uses to support the primary uses on the development will be supported within a single building or small cluster of buildings within the development to act as a focal point for the development and local community, including uses such as café/restaurant, meeting spaces and education/training spaces (i.e., Use Classes E(b), E(d), E(f), F1(a) and F1(e)).

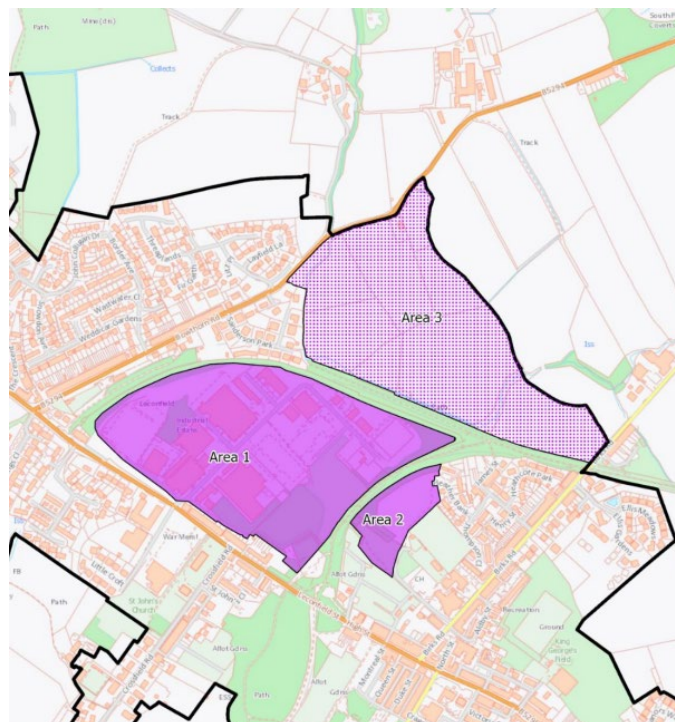


Figure 3: Excerpt from Policy E4PU Cleator Moor Innovation Quarter at Leconfield: Areas for Development

6. Planning Assessment

6.1 Following the planning policy review the following policy considerations have been established as pertinent to the determination of the planning application proposals:

- The Principle of Development
- Other material considerations:
 - Transport and accessibility
 - Flood risk and drainage
 - Design and layout
 - Landscaping and public realm
 - Ecology
 - Residential Amenity
 - Noise and Air Quality
 - Ground Conditions

Principle of Development

6.2 The starting point for assessment of planning applications as set out by S38 (6) of the Planning and Compulsory Purchase Act 2004 is the adopted Development Plan unless material considerations indicate otherwise. As set out earlier the adopted Development Plan comprises the Copeland Local Plan 2013-28 Core Strategy and Development Management Policies (2015) , the remaining saved policies of the Copeland Local Plan 2001-2016 and the draft policies of the emerging Local Plan.

6.3 The application site covers a total of approximately 35Ha and comprises of three land parcels, discussion of the Masterplan Proposals against the adopted policy position for each area is set out below.

Principle of development: Area 1

6.4 Area 1 comprises of the existing Leconfield Industrial Estate. The adopted proposals map shows the site is:

- Located within the development limits of Cleator Moor, a Key Service Centre towards which development is to be directed as a sustainable location and within which development is considered acceptable subject to other considerations (Core Strategy Policies ST1 and ST2).
- Allocated as an employment site within which development for employment uses and some non-employment uses is considered acceptable in principle subject to other considerations (Policies Saved Policies EMP1, EMP3 and Core Strategy policies ER4 and ER6).

- 6.5 Leconfield Industrial Estate is in a poor and unattractive state. Given its prime central location within Cleator Moor, off the town's main thoroughfare this has a detrimental impact on the built quality of the settlement and also perceptions of the town. The CMIQ Masterplan Proposals aim to halt this decline and rejuvenate Leconfield Industrial Estate into a high-quality landscape-led campus which will accommodate the CMIQ business cluster for nuclear and related engineering sectors; an intervention programme to reorientate Copeland Borough's forecast economic decline.
- 6.6 To achieve this the Masterplan Proposals propose a number of works for Leconfield Industrial Estate including renovation of existing buildings, extensive landscape improvements and the erection of approximately 10,640sqm (114,500sqft) of new bespoke accommodation for businesses with operations falling under Class B2 *light industrial*, B8 *storage and distribution* and E(g(ii&iii)) *research and development* uses.
- 6.7 In this regard the development of Area 1 to accommodate Class B2 *light industrial*, B8 *storage and distribution*, E(g) *research and development* therefore wholly accords with adopted Local Plan Policies EMP1, EMP3, ST1, ST2, ER4 and ER6 in being in an appropriate, sustainable, and preferred location for employment development.
- 6.8 The Masterplan Proposals for Area 1 also include an element of ancillary uses, namely Class F1(a) *education and training*, (Class E(b)) *food/beverage* and Class F1(e) *public/exhibition space* uses. accompanying Drawing DR-A-90003 '*Parameter Plan- Proposed Use*' illustrates on a plot-by-plot basis where the proposed uses are to be accommodated. It is intended that the ancillary uses are housed within a single building within Plot 11, referred to presently as the 'Hub building'.
- 6.9 The Hub building is to be the focal point for the CMIQ campus providing workshop and training space to encourage collaborative working, education opportunities and meeting space. The final quantum and distribution of the ancillary uses will be established at subsequent reserved matters stage once the detailed design for the Hub has been finalised. Restriction of these uses to a single development plot will ensure that their provision will be secondary to the principle uses proposed for Area 1. Whilst it is highlighted that Policy EMP3 permits an element of non-employment uses on Area 1, including the location of Plot 11, the scale of the ancillary uses, in particular the food/beverage element will be such to compliment the existing offer in the town centre and will not impact negatively on its continued vitality or viability. Furthermore, through the creation of the CMIQ the Masterplan Proposals aim to significantly increase the workforce established in Cleator Moor and include footpath and cycle route improvements to encourage connectivity to the town centre encouraging

greater town centre footfall thereby helping to support existing businesses in the town as required by Policy ER7.

6.10 It is also highlighted that Area 1 comprises of previously developed land, large portions of which have been vacant and underused for several years. By redeveloping vacant areas of Leconfield Industrial Estate for new business accommodation to meet modern operational requirements the Proposals accord with NPPF Paragraphs 119 and 120, and Core Strategy Policies ST1 and ST2 which prioritise the reuse of brownfield land to encourage prosperous economic growth.

6.11 Therefore, given the above the principle of developing Area 1 to accommodate a mix of light industrial, research and development with an element of complimentary service uses is in accordance with Local Plan Saved policies EMP1, EMP3, Core Strategy Policies ST1, ST2, ER4 and ER6 and NPPF Paragraphs 119 and 120 in being an appropriate, sustainable and preferred location for employment development.

Principle of development: Area 2

6.12 Area 2 comprises of grassed land and hardstanding to the east of Area 1; the adopted proposals map shows the site is:

- Located within the development limits of Cleator Moor, a Key Service Centre towards which development is to be directed and within which development is considered acceptable subject to other considerations (Core Strategy Policies ST1 and ST2).
- Allocated to accommodate housing development comprising of approximately 48no. homes (Saved Policy HSG2).
- Outside of the Cleator Moor town centre boundary (Core Strategy Policy ER9).

6.13 The Masterplan Proposals seek to establish the principle for the site to accommodate light industrial (Class B2), research and development (Class E(g)) and/or student accommodation (*sui generis*) and/or hotel (Class C1) uses as illustrated on accompanying Drawing DR-A-90003 '*Parameter Plan- Proposed Use*'. These uses are complimentary to the delivery of the CMIQ business cluster and mindful of adjacent development, are all uses considered generally acceptable in residential areas, subject to appropriate controls and design response.

6.14 Area 2 has been identified for development since the adoption of the Copeland Local Plan in 2006, with Policy HSG2 'saved' in 2007. Whilst the Masterplan Proposals for the land are not for residential use (Class C3) as per the Policy allocation, development of the site has been established as acceptable, appropriate, and sustainable by virtue of its allocation in the Local Plan. Given that Area 2

has been allocated for residential development, (to accommodate approximately 48 homes) but no homes have been delivered in the intervening 16 years it is appropriate and reasonable to conclude that no residential development is forthcoming and so it should be considered for alternative uses.

- 6.15 The proposed mix of uses for Area 2 however are generally considered to be compatible uses for residential areas. As is demonstrated in the remainder of this report, development of Area 2 can be achieved for each of the proposed uses without detrimental impact on neighbouring amenity. Where any potential mitigation measures are identified these can be secured through the application of appropriately worded conditions where necessary.
- 6.16 The vision and requirements for this part of the site include accommodation in order to serve the Cleator Moor Innovation Quarter project. The intention being that businesses locating at Cleator Moor Innovation Quarter are likely to have requirements for temporary accommodation for those visiting or working at the site. At this stage flexibility is required on what form this accommodation will take and it may be based around a “student accommodation” model or a more flexible “hotel accommodation” model.
- 6.17 Notwithstanding this it is acknowledged that hotel use represents a ‘main town centre use’ as defined at Annex 2 of the NPPF. Whilst Area 2 is adjacent to the town centre it is outwith the defined boundary and as such occupies an ‘edge of town centre’ location, (as per Annex 2 of the NPPF) triggering the need for a sequential assessment (NPPF Paragraph 87).
- 6.18 However, it is noted that Core Strategy Policy ER9 (at criterion A(i)), supports service sector development within Cleator Moor, setting out that:
- “Appropriate retail and service sector provision will be actively encouraged within the defined boundaries of each Key Service Centre to serve local communities and to facilitate small scale tourism...”*
- 6.19 Area 2 is located within the defined settlement limits of Cleator Moor, a Key Service Centre (as defined by Core Strategy Policy ST2). The proposed hotel use is principally identified to accommodate need arising from the CMIQ development but will also cater for tourist needs. By supporting tourism through providing additional accommodation offer the Proposals are considered policy compliant.
- 6.20 The principle of the development of Area 2 is therefore acceptable mindful of Core Strategy Policies ST1, ST2 and ER9 in that it is an appropriate and sustainable location within the built extent of Cleator Moor and by virtue of its allocation for development for 16 years under Saved Policy HSG2.

Principle of Development: Area 3

- 6.21 Area 3 comprises of farmland to the north of Area 1, the adopted proposals map shows the site is:
- Identified in part (approximately 40% of site area) as being located within the development limits of Cleator Moor, a Key Service Centre towards which development is to be directed reflecting its sustainable location and within which development is considered acceptable subject to other considerations (Core Strategy Policies ST1 and ST2).
 - Identified in part (approximately 40% of site area) as an employment site within which development for employment uses is considered acceptable in principle subject to other considerations (Saved Policy EMP1 and Core Strategy Policies ER4 and ER6).
 - Identified in part (approximately 60% of site area) as 'open countryside' by virtue of it being outwith the defined settlement limits of Cleator Moor where development is restricted to a limited range of acceptable uses (Core Strategy policies ST1 and ST2).
- 6.22 The Masterplan proposals seek to secure the in-principle acceptance of the development of the land to accommodate Class B2 Light industrial, and Class E(g) research and development and general industrial processes as illustrated on accompanying Drawing DR-A-90003 '*Parameter Plan- Proposed Uses*'.
- 6.23 It is acknowledged that by virtue of a significant portion of Area 3 falling outside of the defined settlement limits of Cleator Moor, where development is limited to a select range of acceptable uses, the Proposals are in partial conflict with the Local Plan which seeks to retain development within settlement limits.
- 6.24 In response it is highlighted that the NPPF, which is also a material planning consideration, requires local plans to respond proactively to changing economic requirements including the need to support and encourage local specialisms and capabilities. Specifically, Paragraph 81 states that:
- "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."*
- 6.25 NPPF Paragraph 83 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors. Including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.
- 6.26 This requirement is reflected in the emerging planning policy provision for the site.

Principle of Development: Emerging Planning Policy

- 6.27 The Council are in the process of updating their Local Plan, at time of writing submission of the Publication Draft of the Copeland Local Plan to the Secretary of State is imminent. Given its relatively advanced progress its policies can be afforded significant weight.
- 6.28 Of particular relevance to the Proposals is draft Policy E4PU '*Cleator Moor Innovation Quarter at Leconfield*'. The policy allocates the entirety of the application area as a mixed-use allocation to accommodate a nuclear and clean energy business cluster. Specifically, with regards to the three CMIQ Site Areas the Policy states:
- Area1: development falling within Class B2, Class B8 and Class E(g) uses are acceptable in principle and Community infrastructure, community facilities and ancillary uses specifically those falling under Classes E(b), E(d), E(f), F1(a) and F1(e)) required to support to the primary uses on the development will be supported within a single building or small cluster of buildings within the development to act as a focal point.
 - Area 2: Development of the site to accommodate Use Class E(g) and student accommodation linked to the site is acceptable;
 - Area 3: Development of the (whole) site for Use Class B2, Use Class B8 and Use Class E(g) is acceptable in principle.
- 6.29 Policy E4PU is in direct response to NPPF requirements for local planning policies and decisions to actively support local economic specialisms, which is highlighted as often best achieved through the provision of business clusters. Copeland Borough has world-leading capabilities in nuclear and related sectors due to the presence of Sellafield – amongst the world's largest and oldest nuclear sites. The creation of the CMIQ cluster will help to develop and expand capabilities through the current Sellafield supply chain to be more export orientated ensuring that Copeland is recognised nationally and globally as a centre for excellence in nuclear and related engineering capabilities.
- 6.30 The emerging Local Plan is based on the most up to date assessment of development need and national policy objectives. As such, whilst it is acknowledged that whilst in part the CMIQ proposals conflict with the adopted Planning Policy, principally by promoting development beyond the defined settlement limits, it wholly in accordance with emerging Policy objectives for economic growth.
- 6.31 It is also noted that emerging Policy DS4PU has redrawn the settlement limit of Cleator Moor, expanding it to include the entirety of Area 3 within the settlement boundary.

- 6.32 In conclusion, the development proposals are in accordance with the emerging policies E4PU in respect of supporting economic growth priorities and DS4PU by being within an appropriate development location toward which significant weight can be attributed in determining the application.

Technical Considerations

Transport and Accessibility

- 6.33 The application is accompanied by a Transport Assessment (TA) prepared by Tetra Tech. The TA illustrates that the site is in an accessible location for pedestrians, cyclists and public transport users. Facilities at Cleator Moor are within a reasonable walking distance with nearby settlements of Whitehaven, Moor Row, Frizington and Egremont within a reasonable cycling distance. Buses are available which provide regular and frequent services to Whitehaven, Workington, Maryport and Egremont.
- 6.34 A new access to Area 3 is proposed in the form of a priority junction with right turn lane ghost island, along with widening to provide a 6.5m carriageway along Bowthorn Road. Appropriate visibility can be provided and it is proposed to extend the 30mph zone further north on the road. On Bowthorn Road, by the terraced housing, a priority give way system is proposed to allow passage of HGVs. This is coupled with the introduction of bay parking and double yellow lines. Further down Bowthorn Road, near its junction with Leconfield Street, an additional off-street parking bay is proposed. The proposals have undergone a Stage 1 Road Safety Audit.
- 6.35 The proposed works on Bowthorn Road will also provide improvements for pedestrians via a new footway on the south-eastern side of the road providing access from Area 3 to Bowthorn Road.
- 6.36 Area 1 including the Hub, as indicated on the illustrative masterplan, will generate 125 vehicles in the AM peak and 119 in the PM peak. Area 2 will generate 67 and 79 vehicles in the AM and PM peaks respectively. Area 3 will generate 135 and 114 vehicles in the AM and PM peaks respectively. In total, the development (including the Hub) will generate 327 and 312 vehicles in the AM and PM peak hours respectively.
- 6.37 The traffic impacts of the proposed development on the Area 1 access mini roundabout at Leconfield Street are identified as small. The roundabout will continue to operate with minimal queues and delays in the future year with the full development in place. The Area 2 and Area 3 access junctions both operate with minimal queues and delay in the future year with full development in place.

- 6.38 The traffic impacts of the proposed development on the local road network are generally minor: the Dalzell Street, Bowthorn Road, Birks Road, and Jacktrees Road all operate with minimal queues and delays with the full development in place, and no junction mitigation works are required. Improvement works are proposed at Hensingham mini roundabout and Hensingham Square mini roundabout.
- 6.39 On the A595 network, Toll Bar, Howgate, and Howbank roundabouts operate well in the future year with minimal queueing and delays, as do the A595 Inkermann Terrace/ Ribton Moorside and A595/ Mirehouse Road. None of these junctions require mitigation measures. The A595/ Rosehill junction and A595/ Homewood Road roundabout require mitigation measures and the proposed development is listed as a contributor towards the costs of the two improvement schemes on the A595 in the WSP Copeland Transport Improvement Study.
- 6.40 The results of a highway safety assessment show the road network operates safely for the volume of traffic passing through it. As none of the accidents reported in recent years are due to inadequate highway design, mitigation measures for safety are not required.
- 6.41 The proposed development meets the sustainability objectives of Section 9 of the NPPF and its traffic impacts are not severe. The proposals also accord with Core Strategy Policies ST1 and DM22 in ensuring an accessible and ensuring safe and efficient access by all users and encouraging sustainable modes of travel. On those bases there is no justifiable transportation reason why planning consent should be withheld.

Flood Risk and Drainage

- 6.42 The application is accompanied by a package of drainage information prepared by BGP, including flood risk assessment, drainage strategy and SuDS management plans for each of the CMIQ areas. A summary is provided in the following table:

Considerations	Area 1 ²	Area 2 ³	Area 3 ⁴
Flood Zone	Flood Zone 1, low risk, appropriate for development	Flood Zone 1, low risk, appropriate for development	Part Flood Zone 1, low risk, appropriate for development Part Flood Zone 2/3 high risk, inappropriate for development. All proposed

² Referred to as Site A in report

³ Referred to as Site C in report

⁴ Referred to as Site B in report

			development areas outside this area.
Existing drainage	Private network discharging into United Utilities network	Combined network adjacent, no foul connections	Combined network adjacent, no foul connections
Proposed surface water strategy	Ground conditions unsuitable for infiltration. Propose to discharge to watercourse Norr Beck.	Ground conditions unsuitable for infiltration. Propose to discharge to watercourse Norr Beck.	Ground conditions unsuitable for infiltration. Propose to discharge to watercourse Norr Beck.
Discharge rates	Western part of site restricted to brownfield rates: 55L/S (to be agreed) Eastern part of site restricted to brownfield rates: 127.40L/S (to be agreed)	Greenfield rate of 22.1l/s (to be agreed)	North west part of site restricted to greenfield rates: 100l/s (to be agreed) North east part of site restricted to greenfield rates 29.6l/s (to be agreed)
Attenuation	Western part of site: sub surface tank with 480m3 volume to accommodate 1 in 100 year event + 40% climate change allowance Eastern part of site: sub surface tank with 780m3 volume to accommodate 1 in 100 year event + 40% climate change allowance	Sub surface tank with 520m3 volume to accommodate 1 in 100 year event + 40% climate change allowance	Various sub surface tanks volume to accommodate 1 in 100 year event + 40% climate change allowance
Foul Water	Connect to existing sewer network	Connect to existing combined sewer	Connect to existing combined sewer
Notes:	Petrol interceptor recommended for surface water from service yards and car parks as treatment method.	Petrol interceptor recommended for surface water from service yards and car parks as treatment method	Petrol interceptor recommended for surface water from service yards and car parks as treatment method

- 6.43 As all proposed development areas are at low risk of flooding and the proposed drainage strategy will not increase risk of flooding on or off-site the proposals are in full accordance with NPPF Paragraph 159 and Local planning policies ST1 and DM24 in respect of minimising flood risk.

Design and Layout

- 6.44 Core Strategy Policy ST1 and NPPF Paragraph 130 require that the design of development proposals respond appropriately to the site and surrounding context.
- 6.45 In general terms, the proposals seek to set maximum building height parameters providing a degree of flexibility for final building designs to respond to end-user requirements. These maximum build

heights have also been informed by consideration of existing topography, tree cover and surrounding built environment.

- 6.46 With regards to the detailed design and layout of the site, this will be established at subsequent Reserved Matters stages, however the submitted proposed uses parameters plan illustrates the broad areas of the site to accommodate the proposed building and parking.
- 6.47 The final position and orientation of buildings will be established at subsequent Reserved Matters stage and will be placed such that existing high-quality habitats are not adversely affected and mindful of ground conditions.
- 6.48 Similarly, appearance, building materials and landscaping will also be established at Reserved Matters stage, nevertheless the submitted Design and Access Statement and Design Code sets out a set of design principles which will be required to be followed once plots and buildings come forward.
- 6.49 Given the above considerations it is considered that the proposals accord with the principles of good design as set out at NPPF paragraphs 126-130 and Local Plan Policy ST1.

Landscape and Visual Impact

- 6.50 The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) prepared by One Environment.
- 6.51 It is acknowledged that by its very nature any development must change the character of a location to some degree. However, with the correct siting, design, architectural and landscape treatment, the development can provide some positive enhancements to a site.
- 6.52 The LVIA has followed the defined methodology of assessing receptor sensitivity against the magnitude of change to identify a significance category for each identified effect. This process has been and is used as the basis for the description of the likely significant landscape and visual effects for the operational phase of the project. For the operational phase, effects at day one and at day one plus 15 years have been examined. This is to understand any potential benefits of mitigation that may accrue through the maturing of the soft landscape that forms an intrinsic part of the development proposals. With respect to each development area, the LVIA has identified the following impacts on surrounding landscape and townscape character:
- 6.53 Area 1: At day one there would be a noticeable change in the townscape character with the increase in built form with associated infrastructure and planting. Combining the magnitude (Moderate) and Sensitivity (Low) results in a Minor adverse effect at Day One. At year 15 the landscape of the site

would be maturing, with trees and the less formal management of the grass areas reducing intrusion from the units to the surrounding landscape, reducing the effects to Neutral / Minor adverse.

- 6.54 Area 2: At day one there would be a noticeable change in the townscape character from an area of poorly managed grassland and overgrown vegetation to new buildings with associated infrastructure and planting. Combining the magnitude (Moderate) and Sensitivity (Low) results in a Minor adverse effect at Day One. At year 15 the landscape of the site would be maturing, with trees and the less formal management of the grass areas reducing intrusion from the units to the surrounding landscape, reducing the effects to Neutral / Minor adverse effect.
- 6.55 Area 3: At day one there would be a noticeable change in the townscape character with the increase in built form with associated infrastructure and planting. The operational activity of workers in the development would also bring about noticeable change in the character of the site and its immediate context. The development would be a busier scene than the baseline and there would also be lighting effects. Combining the magnitude of change (Major) and Sensitivity (Medium) results in a Moderate / Major adverse effect at Day One on the site and its immediate context. At year 15 the landscape of the site would be maturing, with trees and the less formal management of the grass areas reducing the intrusion from the units to the surrounding landscape, reducing the effects to Moderate adverse.
- 6.56 With regards to visual effects of the development proposals, the LVIA identifies:
- 6.57 Area 1 and Area 2: As the sites are well screened by existing vegetation and built form with overall magnitude of visual effects is identified as minor beneficial at day one at with effects at year 15 between Moderate beneficial to minor adverse for various receptors.
- 6.58 Area 3: at day one there would be significant adverse effects of views into Area 3 of a magnitude of major adverse. At the 15 year point the magnitude of impact on views ranges from minor adverse to major adverse based upon the sensitivity of the receptor.
- 6.59 With regards to middle distance views (100-500m) these are generally screened by existing vegetation, built form and topography. There are views from the north along Bowthorn Road and Birks Road which would result in Moderate /Major adverse effects at day one reducing to Moderate adverse as the planting develops at year 15
- 6.60 With regards to long distance views (500m+) these are generally screened by existing vegetation, built form and topography. There are views of the Site from the Lake District National Park of High Sensitivity but at the distance and in the context of the existing landscape, the proposals would the

proposals would result in Minor/Moderate adverse effects at day one, reducing to Neutral / Minor adverse as the planting develops at year 15.

- 6.61 Where existing views are affected, mitigation, in the form of new and reinforced boundary planting and tree and hedgerow planting within the scheme, has been put in place to reduce adverse visual effects. Over time, the magnitude of these effects will be reduced for close distance receptors and mitigated for the medium or long-distance receptor.
- 6.62 With the mitigation provided by the planting proposals, the development will be seen to blend into the wider panorama of built form and vegetation. While there are significant impacts on Area 3, the site and its immediate context are not considered of high sensitivity and visibility is restricted. Impacts on the Lake District National Park are considered to be less than significant given the distance and the adjacency of the development to the existing settlement and its wider context.
- 6.63 It is considered that effects on the surrounding countryside to the Site can be adequately mitigated through appropriate measures which can be secured through the planning process.
- 6.64 In this respect the proposals are in accordance with NPPF Paragraph 174 and Core Strategy Policies ENV5 and DM26 in ensuring there are no severe impacts on the surrounding Landscape character.

Landscaping and public realm

- 6.65 The landscape strategy for the development adopts the hierarchical approach that seeks first to avoid damaging habitats, then to mitigate the damage and then, where not possible, look to offset the lost habitats. A series of key principles have been set in response to this approach, these include:
- The layout of the built form was amended to substantially avoid impacts on the highest biodiversity value habitats.
 - Identifying habitat that would benefit from enhancements such as the Nor brook which can be opened and cleared of weeds to create a wider variety of habitats.
 - Retain and enhance the significant linear belts of woodland.
 - Developing existing low value habitats through management rather than removing them and replacing with new habitats such as the existing streetscape landscape.
 - Maximise the use and variety of existing green infrastructure.
 - Build on the proposed connections and new green streets to provide a high quality environment between the built form.
 - Create additional links between the wetland, hub and town centre.
 - Provide a landscape buffer to all boundaries with specific emphasis on the northern boundary.

- Review potential to reduce the scale and density of development moving towards the countryside and town centre.

6.66 It is considered that the proposed development meets the requirements of Local Plan Policy DM26 (Landscaping) which requires that all development proposals will be assessed in terms of their potential impact on the landscape.

Ecology

6.67 The nearest Natura 2000 site is the River Ehen SAC 1.3 km south east from site. There are also one Site of Scientific Interest, four County Wildlife Sites and three Sites of Invertebrate Significance within 2 km of the site. The works are not considered to impact on any on any statutory or non-statutory designated sites in the area, including River Ehen SAC.

6.68 The site was comprised of broadleaved woodland, mixed woodland, dense scrub, scattered scrub, mixed scattered trees, unimproved neutral grassland, semi-improved neutral grassland, marshy grassland, amenity grassland, tall ruderal vegetation, swamp, ephemeral vegetation, bare ground, hard standing and buildings.

6.69 Detailed NVC, Invasive Species and BNG reports have been submitted with the site having habitat suitability for amphibians (including great crested newt), reptiles, bats, badgers, breeding birds, red squirrel, invertebrates and hedgehog. Detailed bat, breeding bird, reptile, GCN and invertebrate reports have been submitted as part of the planning application.

6.70 A Habitat and Landscape Management Plan (HLMP) is recommended to accompany the final detailed design layout for the site. This should include appropriate mitigation measures to offset any habitat loss as a result of the development and provisions for biodiversity enhancement in line with Biodiversity Net Gain principal and the Copeland Local Plan Policy ENV3.

6.71 It is also recommended that the protection of on-site and adjacent habitats during construction works should be addressed through the provision of a Construction Environmental Management Plan (CEMP).

6.72 In terms of protected species the following conclusions have been made:

- Following eDNA and traditional presence/ absence surveys it was found unlikely that GCN are present on the site.
- A medium population of smooth and palmate newts were found with further common toad and common frog populations also being present.

- Detailed bat surveys on site revealed that buildings B1 and B6 held common pipistrelles day roosts used by individual bats.
- There was no current evidence of badger setts on Site A and Site C.
- The breeding bird surveys revealed that breeding birds recorded on site included predominantly common passerine species breeding within the woodland edge and scrub habitats on site. The proposals indicate that majority of these habitats will be retained and incorporated into the proposed site layout.
- The site is considered to be of local value for invertebrates. A biodiversity planting scheme is recommended as part of the HLMP in order to provide suitable habitats for invertebrates and to offset the loss of the current nectar-rich habitats.

6.73 It is therefore concluded that the requirements of Policy DM25 (Protecting Nature Conservation Sites, Habitats and Species) can be satisfied – that is the requirement that development should protect the biodiversity value of land and buildings and maximise opportunities for conservation, restoration, enhancement and connection of natural habitats.

Noise and Air Quality

- 6.74 Noise surveys have been undertaken at locations representative of existing dwellings and proposed noise-sensitive development that would be closest and most exposed to any noise associated with the proposals. In addition, potential road traffic noise emissions from the new access roads in Areas 2 and 3 have been predicted using computer noise modelling which has then been assessed against a range of guidance, standards and policies.
- 6.75 The assessment found that, provided appropriate noise mitigation measures are incorporated in the design and use of the development, that the predicted increase in noise levels attributable to proposed new access roads should not result in an adverse or unacceptable noise impact on the amenity of existing or proposed noise-sensitive receptors.
- 6.76 To safeguard the amenity of existing and any proposed noise-sensitive development and ensure the viability of the development, a collection of outline noise mitigation and control measures have been provided that aim to minimise potential noise emission from the site. These measures include acoustic screening, the location and orientation of buildings, and noise level limits.
- 6.77 Provided appropriate noise mitigation and control measures are incorporated in the design and use of the site, an acceptable degree of residential amenity should be secured at both existing and proposed noise-sensitive receptors dwellings.

- 6.78 The submitted Air Quality Assessment has assessed the potential changes in air quality due to the construction and operation of the proposed development and whether these potential changes would significantly alter air quality. The assessment of dust soiling and human health impacts during the construction phase of the development results in the proposal of dust mitigation measures. The implementation of these will ensure that residual dust impacts during the construction phase are not significant.
- 6.79 Concentrations of NO₂ and PM₁₀ are likely to be below their respective long and short-term objectives at the proposed development site which is therefore considered suitable for residential (student) and commercial use with regards to air quality. Concentrations of PM_{2.5} are expected to be below the annual mean target.
- 6.80 The submitted report concludes that the proposed development is not expected to have a significant impact on local air quality.

Ground Conditions

- 6.81 In terms of overarching observations, the submitted reports state that given the expected ground conditions, the use of strip or pad foundations for the new development is anticipated at present. Where loose made ground or soft/loose natural deposits are encountered, foundations will need to be taken through the made ground/disturbed ground into underlying natural strata of adequate bearing capacity.
- 6.82 The desk studies have also shown that the site may have been exposed to some contamination, with construction/demolition waste and possibly oils or fuel from vehicle spills the most likely source local to the structures. Asbestos may also be present on the site from previous/existing building materials used on-site.
- 6.83 Made ground is also expected on the sites, therefore ground gas assessment is recommended due to the nature of the development.

Area 1

- 6.84 Area 1 comprises the existing Leconfield Industrial Estate. The site lies within a complex geological setting. The western part of the site lies within a Development High Risk Area with eight known mine shafts on or within 20m of the site.
- 6.85 The eastern part of the site lies in an area where between 10% to 30% of homes are estimated to be above the radon action level.

- 6.86 As part of development proposals, if new buildings are proposed in the eastern part of the site, radon protection measures will be required.
- 6.87 Further work is required to determine if there are iron workings beneath the eastern part of the site is also required. A full ground investigation to determine the contamination risk posed to on-site receptors and the nature and type of slag deposits is also recommended.

Area 2

- 6.88 Area 2 comprises of grassed land and hardstanding to the east of Area 1. The report highlights that the site is situated within the boundary of two mine entries 20m of the site or the boundary of the site. It is highlighted that there are possible ancient shallow coal mining working within the likely zone of influence on the surface in the vicinity of the property, for which no accurate plans or records exist and there are possible workings in minerals other than coal.

Area 3

- 6.89 Area 3 comprises of farmland to the north of Area 1, given the presence of possible workings within haematite, it is considered necessary to undertake a series of rotary boreholes to ca. 30.00mbgl to investigation the presence of mine workings.
- 6.90 On the basis of the above, the development proposals accord with NPPF Paragraph 183 and Core Strategy Policy ST1 in relation to ensuring safe ground conditions for development.

Residential Visual Amenity

- 6.91 A Residential Visual Amenity Assessment (RVAA) has been prepared by One Environment. The study provides an appraisal of the impacts on visual amenity, experienced by residents of local properties in close proximity to the Site that would be likely affected by the proposed development. The report focuses on seven individual properties or groups of properties identified and agreed with Officers at the Council, and involves a detailed assessment of the changes to the view at these locations. The distance from the development, the orientation and height of the residential property and the influence of intervening screening are key factors to be considered in assessing the potential impact on visual amenity.
- 6.92 The purpose of this report is to ascertain the extent of change within the view from specific residential properties and to determine whether further mitigation within the Landscape and Site Masterplans are required.

- 6.93 Of the seven individual or groups of properties considered, three groups of properties are appraised as having the potential to experience a high magnitude of change which would indicate potential significant effects.
- 6.94 These are residential properties located within 100m of the Site with an uninterrupted view:
- No 13 Layfield Lane (VP2). Also neighbouring properties Nos 14, 15 and 16;
 - No 22 Sanderson Park (VP6);
 - Nos 63, 64, 65, 66 & 67 Birks Road (VP7).
- 6.95 For each of the above properties there is potential to reduce the level of significant visual effects within the Masterplan by the following:
- Reduce the height and mass of the proposed buildings in closest proximity to the residential property (lowest vertical parameter is shown at the eastern and western edges of the site).
 - The colour of the buildings could be designed to relate to the muted hues of the surrounding countryside.
 - Ensure all street lighting is downward facing and security lighting is motion sensed only to minimise excessive light spill;
 - Within the CMIQ Masterplan there is potential to construct a high quality soft landscape. The early introduction of tree planting and wildlife habitat would assist in the assimilation of the new built form into the landscape, detracting the viewer away from the built form. The impact of the built form could be lessened by adding screen planting on site boundaries, street tree planting (Medium to Large size trees) alongside primary routes, tree planting in car parking areas and wildlife habitat in areas between buildings. All street tree planting would require an appropriate root space to ensure their satisfactory establishment in the long term.
- 6.96 Subject to detailed mitigation, these residential properties would experience a change in the middle distance of the view however the Residential Visual Amenity Threshold would not be reached.

7. Conclusions

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications for planning permission be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 7.2 This Planning Statement has set out how the proposed development accords with the NPPF and the relevant policies of Copeland Borough Council's adopted Development Plan and saved policies.
- 7.3 The development proposals seek planning permission for:

"Provision of up to 44,350 sqm (GEA) floorspace for light industrial, general industrial and storage & distribution (Class E(g), B2, B8 uses), Hotel (Class C1) and Student Accommodation (Sui Generis) with ancillary food/beverage (Class E(b)), education and community facility uses (Class F1(a & e)) with internal accesses, parking, service yards, attenuation basins, electricity substations and associated infrastructure, earthworks and landscaping."

- 7.4 Part of the site is allocated for employment in the 'saved' policies of the 2006 Local Plan. Policy EMP1 *Employment Land Allocation* allocates the Leconfield Industrial Estate and 5.3Ha of adjacent land to north; 'Leconfield Extension' land is identified as a 'Local Employment Site' where Uses B1, B2 and B8 are considered acceptable in principle. Policy EMP3 *Employment Opportunity Sites* identifies the built extent of Leconfield Industrial Estate as an employment opportunity site suitable for a wide range of employment uses (Class B1, B2 and B8) but may also be suitable to accommodate non-employment uses subject to other policy considerations.
- 7.5 Within the emerging Local Plan, Strategic Policy E4PU *Cleator Moor Innovation Quarter at Leconfield* allocates Leconfield Industrial Estate and adjacent land to accommodate the Cleator Moor Innovation Quarter business cluster. The primary uses on the Cleator Moor Innovation Quarter development will be limited to Use Class B2, Use Class B8 and Use Class E(g) only. Community infrastructure, community facilities and ancillary uses to support to the primary uses on the development will be supported within a single building or small cluster of buildings within the development to act as a focal point for the development and local community, including uses such as café/restaurant, meeting spaces and education/training spaces (i.e., Use Classes E(b), E(d), E(f), F1(a) and F1(e)).
- 7.6 Furthermore, in relation to the technical surveys undertaken on the site have demonstrated:
- The proposed development meets the sustainability objectives of Section 9 of the NPPF and its traffic impacts are not severe. The proposals also accord with Core Strategy Policies ST1 and DM22 in ensuring an accessible and ensuring safe and efficient access by all users and

encouraging sustainable modes of travel. On those bases there is no justifiable transportation reason why planning consent should be withheld.

- As all proposed development areas are at low risk of flooding and the proposed drainage strategy will not increase risk of flooding on or off-site the proposals are in full accordance with NPPF Paragraph 159 and Local planning policies ST1 and DM24 in respect of minimising flood risk.
- In terms of Landscape and Visual Impact, it is considered that effects on the surrounding countryside to the Site can be adequately mitigated through appropriate measures which can be secured through the planning process.
- With regard to ecology, it is concluded that the requirements of Policy DM25 (Protecting Nature Conservation Sites, Habitats and Species) can be satisfied – that is the requirement that development should protect the biodiversity value of land and buildings and maximise opportunities for conservation, restoration, enhancement and connection of natural habitats.
- Provided appropriate noise mitigation and control measures are incorporated in the design and use of the site, an acceptable degree of residential amenity should be secured at both existing and proposed noise-sensitive receptors dwellings.
- The submitted Air Quality Assessment concludes that the proposed development is not expected to have a significant impact on local air quality.
- Subject to detailed mitigation, a small number of residential properties would experience a change in the middle distance of the view however the Residential Visual Amenity Threshold would not be reached.

7.7 Overall, the proposals will not result in harm that would outweigh the benefits of granting permission.

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