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# PLANNING STATEMENT

December 2021  
On behalf of GAP Group

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## 1.0 INTRODUCTION

1.01 This application seeks full (retrospective) planning permission for the following:

- The new building will be used as a workshop and store to provide additional space to accompany the approved building known as Unit 2. The new building, will in essence be an extension of the activities carried out in the main workshop to include storing of plant and equipment (including welfare units) and servicing and repairs of the same. There will be a small, ancillary office/store located to the rear corner and apart from that the building will be open plan with a few perimeter work stations to create safe and appropriate stations for repairs, servicing and testing to be performed. The small office/store will contain racking for storing small seasonal items, whilst there will also be an office workstation for the foreman. It should be noted that reserved matters approval was granted for two buildings under ref: 4/94/0339/O but only one of these buildings was originally constructed. It has not been possible to ascertain the location of the second building that was not constructed from ref: 4/94/0339/O because the Council have confirmed in an email on 19<sup>th</sup> November 2021 that they only have records on the system back to around 2000. The recently constructed building has a floor area of 300m<sup>2</sup>.
- Change from hard core to concrete surface. Hard core was approved under ref: 4/20/2369/0F1 at the site but it was decided that concrete would provide a more robust surface.
- It should be noted that the number of people employed at the site is not intended to increase but the newly erected building will help to support the existing employees at the site.

## 2.0 THE SITE AND SURROUNDINGS

- 2.01 The application site, which measures 0.66ha in total, is located on the northern side of John McBain Avenue, within the Whitehaven Commercial Park, and currently consists of one industrial unit, which is located on the western side of the site, and an associated yard on the eastern side of the site. As shown on the accompanying 'Site Plan Ownership and Lease Areas' Plan GAP lease the western part of the site from various different owners on whom the relevant certificates have been served. GAP own the eastern part of the site, including the rough land to the far east which has recently been concreted to aid with the expansion of the eastern storage yard.
- 2.02 All of the application site is located within the Settlement Boundary for Moresby Parks as defined in the Copeland Local Plan 2013-2029 Proposals Map. According to the Copeland Local Plan (2013-18) Moresby Park is a 'Local Centre'. The eastern side of the site is defined as having an 'Employment Land Allocation' under the same Proposals Map. The western part of the site has an established industrial use following implementation of outline ref 4/91/0222/O and reserved matters ref 4/94/0339/O. The building in question is located in the middle of the site and is located primarily on land having an 'Employment Land Allocation' but the western part of the building is just within the part of the site benefitting from a previous established industrial use.
- 2.03 Outline planning permission was granted across the wider site under reference 4/91/0222/O for an 'Industrial Development including Use Classes B1, B2 and B8 and Non-Food Retail sales'. The application site falls wholly within the approved area for industrial development approved under ref 4/91/0222/O. On 7<sup>th</sup> July 1994 a reserved matters application was approved for two units under ref 4/94/0339/O. The reserved matters application granted approval for '2 No. Factory Units for Classes B1, B2 and B8'. One of these two units, known as Unit 2, can be found on the western side of the application site and was approved under ref 4/94/0339/O for B1, B2 or B8 uses. The eastern part of the application site is located within the boundary of ref 4/91/0222/O but is located outside of the boundary for ref 4/94/0339/O.
- 2.04 The western part of the site (0.26ha) is used primarily in connection with the storage and hire of plant and tool. The unit located to the west of the site (Unit 2) is used for the repair of plant and also has a hire desk area, manager's office, canteen, staff welfare, and toilets. Unit 2 comprises 712.8m<sup>2</sup> of floor space which can be broken down as follows:
- Ground floor workshop (inc. storage of plant and equipment) 424.8m<sup>2</sup>;
  - Ground floor office 144m<sup>2</sup>;
  - First floor office and staff welfare plus ancillary mezzanine 144m<sup>2</sup>.

The eastern part of the site (0.4ha) is used primarily in connection with the storage and hire of non-mechanical equipment, welfare equipment, lifting equipment and some plant and tool equipment. A wash bay and connecting interceptor can be found in the centre of the site whilst a waste disposal point can be found close to the southern boundary of the site. A waste skip is used for the solids which gather at the bottom of the wash bay, as a result of cleaning machines when they are returned. Commercial bins for normal and recyclable waste are provided next to the back door of Unit 2.

Planning permission was granted under ref: 4/20/2369/0F1 on 6<sup>th</sup> July 2021 for the regularisation of activities at the site and permission was granted for the following:

*The use of the western part of the site as a storage yard in association with hire of plant and tool equipment including the Unit 2 as a workshop, store and ancillary office with associated staff welfare*

*facilities and regularisation of all associated activities and structures on site (retrospective); The use of the eastern part of the site as a storage yard in association with hire of equipment and regularisation of all associated activities and structures associated with the operation of the site including fencing, external lighting, wash bay and disposal point (retrospective); Proposed expansion of the existing eastern storage yard to be used in association with storage and hire of equipment.*

- 2.05 The application site is located within Flood Zone 1 and does not suffer from surface water flooding as defined by the Environment Agency's maps.
- 2.06 The application site is not located in close proximity to any protected sites of biodiversity or geological importance and the application site is not located in close proximity to any designated conservation areas or nationally / locally listed buildings.

### 3.0 THE PLANNING CONTEXT

3.01 At a national level the National Planning Policy Framework (NPPF) 2021 and the Planning Practice Guidance (PPG) are material considerations.

3.02 The following saved policies from the Copeland Local Plan 2001-2016 are of relevance:

- Policy EMP1 – Employment Land Allocations
- Policy TSP8 – Parking Requirements

3.03 The following policies from the adopted Copeland Local Plan 2013-2028 (adopted Dec 2013) are of relevance:

#### Core Strategy Policies

- Policy ST1 – Strategic Development Policies
- Policy ST2 – Spatial Development Strategy
- Policy ER4 – Land and Premises for Economic Development
- Policy ER6 – Location of Employment
- Policy ER11 – Developing Enterprise and Skills
- Policy ENV1 – Flood Risk and Risk Management
- Policy ENV3 – Biodiversity and Geodiversity
- Policy ENV5 – Protecting and Enhancing the Borough's Landscapes

#### Development Management Policies

- Policy DM3 – Safeguarding Employment Areas
- Policy DM10 – Achieving Quality of Place
- Policy DM11 – Sustainable Development Standards
- Policy DM22 – Accessible Developments
- Policy DM23 – Information and Communications Technology
- Policy DM24 – Development Proposals and Flood Risk
- Policy DM25 – Protecting Nature Conservation Sites, Habitats and Species
- Policy DM26 – Landscaping
- Policy DM28 – Protection of Trees
- The Cumbria Development Design Guide (adopted Nov 2017) also requires consideration.
- The emerging Copeland Local Plan 2021-2038 has not reached the final consultation stage and is therefore not considered to be a significant material consideration to the determination of this application.

## 4.0 PLANNING ASSESSMENT

### Principle of Development

- 3.01 Adopted 'Policy ST1- Strategic Development Principles' outlines the fundamental areas of the Local Plan that inform and underpin the Borough's planning policies. The proposal is in accordance with the economic and social sustainability principles of this policy because the recently constructed building will support diversity in jobs and will support the creation of investment in job creation as encouraged by part (ii) of the 'Economic and Social Sustainability' section of Policy ST1. The proposal is also in accordance with the 'Environmental Sustainability' section of Policy ST1 because the site is not at risk of flooding and is located within Flood Zone 1 and will also be in accordance with the section 'Ensure the creation and retention of quality places' because the scale and appearance of the new building is in accordance with the existing buildings in the locality.
- 3.02 The application site is located within the settlement boundary and so is supported by adopted 'Policy ST2 – Spatial Development Strategy' which states that development will be located in the Borough's settlements at an appropriate scale, within defined settlement boundaries, in accordance with the Borough's settlement hierarchy as set out in Figure 3.2. Figure 3.2 defines Moresby Park as a 'Local Centre' and explains that employment development in such areas should place an emphasis on retention whilst new provision will most likely be provided through conversion/re-use of existing buildings or completion of sites already allocated. The application is in accordance with this policy because the new building is located on a site currently used for employment activities which is located in the wider site approved under ref 4/91/0222 for 'Industrial Development' whilst also having an 'Employment Land Allocation' under the current adopted Proposals Map.
- 3.05 Adopted 'Policy ER4 – Land and Premises for Economic Development' states that the council will maintain an adequate supply of land and floorspace for economic development by allocating land for economic development, to allow a flexible response to emerging demand and by safeguarding employment areas. The supporting text to Policy ER4 explains that Whitehaven Commercial Park should be reserved as a valuable resource for local businesses. The current operations by GAP provide employment for 16 employees and the erection of a building to provide additional capacity is essential for ensuring the viability of the site. Supporting the existing employment generating activities at the site is considered vital to the area because a lot of the wider industrial site remains vacant and so the current GAP operation should be encouraged because it is making use of this underutilised industrial space.
- 3.06 Adopted 'Policy ER6 – Location of Employment' explains that outside Whitehaven, the Key Service Centres, and the allocated sites, smaller scale economic development proposals will be considered on their merits, with the following matters being particularly important:
- *justification for rural location*
  - *transport impact*
  - *vulnerability to flooding*
  - *impact on residential amenity and*
  - *impact on landscape character, settlement character and biodiversity.*

As explained earlier in this statement the majority of the new building is located within an allocated employment site, with the remainder located in the part of the site with an established industrial use and is therefore considered to be in accordance with policy and justification is not required with regard to the list of matters from 'Policy ER6'.

The current plant hire operation is an employment generating use. The whole of the application site is located in an area that originally had outline approval for industrial development (and the western part of the site has detailed reserved matters approval for industrial use) and so the existing use on site is considered to be in accordance with 'Policy ST2 – Spatial Development Strategy' which states that there should be an emphasis on retention. The retrospective approval of this new storage and workshop building will therefore help to ensure the viability and retention of the existing employment use. It is therefore considered that this application for the provision of a new building does not need to specifically address the list of five criteria from 'Policy ER6'. Notwithstanding this, it is considered that the application site does meet the tests of the five criteria from 'Policy ER6' because the application site is within a settlement boundary and is therefore close to good sources of employment. The adjacent Moresby Parks Road provides good transport links to Whitehaven and the wider area and the site is not vulnerable to flooding being in Flood Zone 1. The only residential development in relatively close proximity to the site is located to the north and is protected by existing, mature vegetation. The accompanying Noise Impact Assessment also demonstrates that the closest dwellings would still benefit from noise levels within the recommended guidelines and that the newly erected building could actually reduce some of the noise transmitted from the site. Finally, the new building is ideally located within the current employment site, which is located within a settlement boundary, and so does not represent encroachment into the countryside, especially in light of the fact that there is existing development providing a backdrop to the north and west of the site.

## Noise

- 4.01 The application is supported by a Noise Impact Assessment Report (NIA). The NIA has concluded that noise levels from operations in the service yard nearest the noise sensitive receptors will remain unchanged. It was also concluded that noise from some operations on the site will be screened from the receptors by the introduction of the building. Therefore, the noise levels will either be the same or slightly reduced due to the introduction of the building.

## Employment

- 4.02 The eastern section of the application site is located within defined Employment Land of the current proposals map and forms part of Employment Allocation Site 'EM2'. Saved 'Policy EMP1 – Employment Land Allocations' states that

*The designation of land for employment use includes approximately 89ha of land allocated or with planning permission for employment use set out in Table EM2. Within these areas development for or changes of use to the employment uses prescribed in Table EM2 will be permitted provided that the requirements of other plan policies are met.*

Table EM2 : Proposed Employment Sites

	Site	Employment land with planning permission (ha)	Employment allocations (EMP1) (h1)	Permitted use
	<b>Strategic Employment Site</b>	<b>12.70</b>		<b>B1, 2, 8</b>
E2	Whitehaven Commercial Park	12.70		B1, 2, 8

- 4.03 '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 by:

*A Enhancing inward investment and promoting the diversification of the Borough's economy, working with partners to support new and expanding employment sectors, particularly energy-related and environmental and innovative energy technologies, such as tidal, off shore wind and micro-generation*

*B Supporting the development of education and training facilities, to encourage people to develop the qualifications and skills that will be attractive to new business and vital for new enterprise*

*C Supporting the development of commercial units which meet the needs of businesses, encourage start ups and promote further expansion in order to retain enterprise, jobs and skills within the Borough*

The existing plant hire operation provides an important source of investment and employment in the area in accordance with part A of 'Policy ER11'. The site employs 16 people (including young apprentices) and also indirectly supports many other businesses in the area including agency drivers which is encouraged by part C of Policy ER11. Approval of the current application for the new building will help to ensure that the current business remains competitive and therefore continues to develop the skillset of the local population.

Employees at the site benefit from training opportunities and the potential to gain new qualifications which is again encouraged by 'Policy ER11 (part B)'. GAP is a member of the governments' apprenticeship scheme to help train young people to work at the site.

- 4.04 The proposal is also in accordance with adopted 'Policy DM3 – Safeguarding Employment Areas' because regardless of whether the new building is classed as a B Use Class or Suis Generis the use is helping to ensure the provision of local employment on a wider site where the lack of inward investment has meant that large areas of the employment area remain undeveloped.

## Transport and Parking

- 4.05 Saved 'Policy TSP8 – Parking Requirements' states that all proposals for new development must comply with the parking requirements set out in Appendix 1 of the saved Local Plan. The maximum levels of car parking permitted for new development are:

- Use Class B1: Stand Alone Offices - 1 space per 30 sq. m;
- Use Class B1: Business Parks - 1 space per 35 sq. m;
- Use Classes B2 and B8 - 1 space per 45 sq. m for.

The Cumbria Design Guide (2017) Appendix 1 Parking supersedes Policy TSP8 and stipulates the following car parking standards noted in the table below. It should be noted that the figures below are purely guidance and that 'Appendix 1 Parking' to the Cumbria Design Guide states that '*Developments may prove acceptable without offering parking levels as indicated below, or prove unacceptable despite offering parking levels equal to or greater than those indicated, depending on the circumstances.*'

Usage Class					
Type of development	Essential Operational Parking	Disabled Parking	Cars	Motorcycles	Pedal Cycles

<b>B1 Business ( Office , Light industry , Research &amp; Development)</b>	50m2 of usable service space per 500m2 gross floor area Plus turning space	1 space or number equivalent to 3% of car requirement whichever is greater.	1 space per 25m2 gross floor area	1 space or number equivalent to 5% of car requirement when more than 20 car spaces needed	number equivalent to 10% of car requirement , minimum of 2 spaces
<b>B2 General Industry</b>	50m2 of usable service space per 250m2 gross floor area Plus turning space	1 space or number equivalent to 3% of car requirement whichever is greater	1 space per 50m2 gross floor area	1 space or number equivalent to 5% of car requirement when more than 20 car spaces needed	number equivalent to 10% of car requirement, minimum of 2 spaces
<b>B8 Storage and distribution</b>					
<b>Less than 235m2</b>	50m2 of usable service space per 500m2 gross floor area Plus turning space	1 space or number equivalent to 5% of car requirement whichever is greater	1 space per 25m2 gross floor area	1 space or number equivalent to 5% of car requirement when more than 20 car spaces needed	number equivalent to 10% of car requirement, minimum of 2 spaces
<b>More and 250m2</b>	50m2 of usable service space per 250m2 gross floor area Plus turning space	1 space or number equivalent to 3% of car requirement whichever is greater	1 space per 100m2 gross floor area	1 space or number equivalent to 5% of car requirement when more than 20 car spaces needed	number equivalent to 10% of car requirement, minimum of 2 spaces

Table 1: Parking guidance from Cumbria County Council 'Development Design Guide 2017'.

The application site makes provision for the parking of 17 cars which was considered satisfactory by the Council when approving planning application ref: 4/20/2369/0F1 to meet the operational needs of the Site. The current proposal will not result in the loss of any parking spaces at the site. Furthermore, given that the new building is primarily to be used to provide additional space to accompany Unit 2, without resulting in an increase in employees at the site, it is not considered that additional vehicular parking is required.

Adopted 'Policy DM22 – Accessible Developments' again reinforces the importance of meeting car parking standards where possible and reinforces The Cumbria Design Guide (2017) guidance that each site should be judged on its own circumstances.

**4.06** Appendix 3 of the 'Cumbria County Council Development Design Guide' states that for 'Other' use classes the requirement for a Transport Statement or Transport Assessment/Travel Plan is '*To be determined on case by case basis by Cumbria County Council.*' The application approved under ref: 4/20/2369/0F1 was supported by

a Transport Statement which explained that the trip generation associated with the current use is comparable with that of B1-B2-B8 uses and is readily accommodated within the existing highway network and is therefore deemed acceptable when considering the site's industrial location. Furthermore, the site benefits from being situated in a sustainable location because existing footpaths are provided alongside the carriageway within the Commercial Park where the Site is located. These footpaths lead to a footpath on Moresby Park Road which connects to the residential area at Moresby Parks (500m to the north of the site) and to industrial and residential areas further south and to the nearest bus stops. The proposed new building, will help support the existing employees at the site, but is not expected to result in more employees, will therefore have no discernible impact on the local transport network.

- 4.07 In terms of cycle storage the existing operations are considered to be in accordance with the guidance contained in the Cumbria Design Guide (2017) because cycle storage space is currently provided within the building at Unit 2 for employees across the whole site. The cycle storage benefits from being located in a locked and covered facility with employee only access and natural surveillance. The storage of bicycles in Unit 2 also means that employees have easy access to the public highway. In addition to the Unit 2 cycle storage facilities the scheme approved under ref: 4/20/2369/0F1 ensured that a bicycle stand has recently been provided at the front of Unit 2 as shown on the accompanying Existing Site Plan. Given that the new building is not expected to result in an increase in the number of employees at the site it is considered that the recently upgraded cycle facilities are adequate.
- 4.08 The Site is part of an industrial estate, with roads able to accommodate the manoeuvres of large vehicles, including refuse vehicles. As noted previously in this statement, the site is utilising the two means of access approved under reserved matters ref 4/94/0339/O.

## Flood Risk

- 4.09 Adopted 'Policy ENV1 – Flood Risk and Risk Management' states that the Council will ensure that development in the Borough is not prejudiced by flood risk through permitting new build development only on sites located outside areas at risk of flooding and ensuring that new development does not contribute to increased surface water run-off. The location of the new building is in accordance with the aims of Policy ENV1 and adopted 'Policy DM24 – Development Proposals and Flood Risk', because the site is located in Flood Zone 1 and in an area that does not suffer from flood risk. Furthermore, a Flood Risk Assessment is not required because the application site is less than 1 hectare (ha) in area and is located within Flood Zone 1. It should be noted that the surface water in the "leased" area of the site is fed into the mains system, and the surface water in the "owned" section of the site is soak-away as it is a hard core on earth surface (see Site Plan Ownership and Lease Areas).
- 4.10 The approved drainage strategy for the site relies on discharge to an existing watercourse and so the new building and replacement of hard core with concrete does not affect the existing approved drainage strategy at the site. Furthermore, the approved drainage strategy was agreed with the Council on the basis of using concrete under ref: 4/20/2369/0F1. The approved Drainage Plans were listed under condition 2 of the decision notice for ref: 4/20/2369/0F1 and include plan 21017/EW01A which assumed use of concrete rather than hard core. Furthermore, the newly erected building will not affect the surface area being drained.
- 4.11 With regard to foul drainage there will be no foul sewerage and there will be no toilets in the new building.

## Natural Environment

- 4.12 Adopted 'Policy ENV3 – Biodiversity and Geodiversity' and adopted 'Policy DM25 – Protecting Nature Conservation Sites, Habitats and Species' state that development should incorporate measures to protect and enhance any biodiversity interest.
- 4.13 The application site is not located in close proximity to any protected or designated sites of biodiversity or geological importance. The applicant agrees to the imposition of a planning condition to enhance the biodiversity of the wider site by way of the provision of bird boxes.
- 4.14 Adopted 'Policy ENV5 – Protecting and Enhancing the Borough's Landscapes' states that the borough's landscape should be protected. Adopted 'Policy DM26 – Landscaping' explains that all development proposals will be assessed in terms of their potential impact on the landscape. The new building has been constructed in a location that is well contained within the site and is therefore in keeping with the industrial surroundings. The new building is also considered to be of a scale and appearance that is sympathetic to the existing building at the site known as Unit 2. The new building measures 5m to the eaves and 8.4m to the ridge whilst the existing building (Unit 2) measures 6.15m to the eaves and 8.23m to the ridge.
- 4.15 The location of the building will ensure that the existing soft landscaping at the site is retained in its entirety. The new building has been erected on land that is surrounded by existing hard standing within the confines of an area already approved for industrial development and so there are not considered to be any concerns with regard to impact on mature trees. The proposal is therefore considered to be in accordance with adopted 'Policy DM28 – Protection of Trees'.

## Sustainability

- 4.16 Adopted 'Policy DM11 – Sustainable Development Standards' stipulates that the Council will ensure that development proposals reach high standards of sustainability.

The proposed building, which only has a floor area of 300m<sup>2</sup>, is considered to comply with the requirements of Policy DM11 because the building has been orientated to ensure that it complements the wider design and layout already established at the site by protecting areas of landscaping whilst ensuring that the yard can operate efficiently. Furthermore, the applicants are willing to agree to an appropriately worded planning condition that will ensure the provision of rainwater harvesting. It should also be noted that the site relies on a surface water management system that is the second most desirable solution in the hierarchy of drainage – i.e. discharge to a surface water body. It should be noted that infiltration was not possible at the site due to ground conditions as was accepted by the Council when determining ref: 4/20/2369/0F1.

- 4.17 The application is supported by a documented titled 'GAP Green Action Plan' which sets out the steps GAP are taking to reduce their carbon footprint and the support GAP provide to their customers to help them reduce theirs too. Some of the measures included within the Green Action Plan are:

- Collaborating with supply chains to develop new products;
- Reducing gas and electricity kWh/per employee year on year;
- Reducing annual A4 paper consumption to 1.2m sheets;
- Reducing the engine sizes of the vehicle fleet;

- Continuing to recycle rubber tracks and tyres;
- Continuing to invest in environmentally friendly infrastructure i.e. solar panels and sensor lighting
- Installing energy efficient LED lighting in all depots across the country;
- Investing in new products to ensure GAP have the youngest and most environmentally friendly fleet in the industry;
- Educating drivers on improvements supporting fuel efficient driving.

## Other Issues

- 4.18 The proposal is in accordance with adopted 'Policy DM10 – Achieving Quality of Place' because the new building has been erected within the storage yard and is in accordance with the character of the site, existing building and the immediate and wider setting which is an employment area. The storage yard is largely hidden by existing fencing, mature vegetation and buildings. Furthermore, the use of concrete for surfacing is an established feature of the wider employment area.
- 4.19 The application site is not located in close proximity to any designated or non-designated heritage features and so is not contrary adopted 'Policy DM27 – Built Heritage and Archaeology'.
- 4.20 Adopted 'Policy DM23 – Information and Communications Technology' requires all major new developments to be enabled for Next Generation Access (NGA) Broadband. The site benefits from ADSL Superfast Connect Broadband.

## 5.0 CONCLUSION

- 5.01 This application seeks to regularise the recently constructed building on site as well as the use of concrete surfacing instead of hardcore.
- 5.02 The proposal is considered to be a satisfactory use of the site, in accordance with all local and national guidance, for the following reasons:
- The existing business generates significant employment (by way of 16 jobs across the site) and supports existing employment uses in the area;
  - The newly erected building will help to ensure the long term viability of the business;
  - The proposal is in keeping with the industrial nature of existing uses and the Employment Land Allocation of the wider area. The scale and appearance of the new building is in accordance with the existing buildings in the locality;
  - The location of the building will ensure that the existing soft landscaping at the site is retained in its entirety;
  - The site benefits from existing footpaths connecting to bus stops which ensures that staff of the site can access the site by alternative modes of transport. The proposed new building will help support the existing employees at the site but is not expected to result in more employees and will therefore have no discernible impact on the local transport network;
  - The current proposal will not result in the loss of any parking spaces at the site. Furthermore, given that the new building is primarily to be used to provide additional space to accompany Unit 2, without resulting in an increase in employees at the site, it is not considered that additional vehicular parking is required.
  - The application is supported by a Noise Impact Assessment (NIA) which explains that the noise levels for receptors will either be the same or slightly reduced due to the introduction of the new building;
  - The applicant is willing to agree to a suitably worded planning condition to ensure ecological enhancement by way of the provision of additional bird boxes at the site;
  - The applicants are willing to agree to an appropriately worded planning condition that will ensure the provision of rainwater harvesting;
  - The approved Drainage Plans that were listed under condition 2 of the decision notice for ref: 4/20/2369/0F1 (including plan 21017/EW01A) assumed use of concrete rather than hard core across the site.

