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Mr. Chris Harrison
Copeland Borough Council
The Copeland Centre
Catherine Street
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18th October 2022

LF – 20/444
BY EMAIL

Dear Chris,

APPLICATION REF. 4/21/2519/0R1 – LAND AT NORTH PARK, RHEDA, FRIZINGTON
SUBMISSION OF REVISED APPLICATION DOCUMENTS

I write on behalf of my client, KCS Agriculture, to submit a revised package of information in support of the reserved matters planning application concerning land at North Park, Rheda, Frizington ('Phase II', to the rear of the Beckstones development by Genesis Homes).

The application in question is described as a '*Reserved matters application seeking approval of appearance, landscaping, layout and scale of outline approval 4/18/2426/001 - outline application for residential development with full details of access and all other matters reserved*'.

The application was validated on the 29th November 2021. During the statutory consultation period, the Applicant has received comments from the following consultees and stakeholders:

- Arboricultural officer
- Highways Officer
- Lead Local Flood Authority
- Flood and Coastal Defence Engineer
- Housing Strategy Officer
- United Utilities
- Arlecdon and Frizington Parish Council
- Members of the public including neighbouring residents.

In addition to the comments received from these consultees and stakeholders, as the allocated Planning Officer you have also provided a number of comments regarding the overall design of the scheme. Having collectively reviewed these comments, the design has been reconsidered, in order to deliver an improved scheme that reflects the feedback received. We set out below a summary of the feedback received to date, and how we have sought to address these comments. A schedule of the revised application package and list of amendments made to the scheme have been provided as appendices to this letter.

The consultee comments can be separated into the following matters:

- Layout, scale and appearance

- Landscape design
- Highways
- Flood risk & drainage
- Housing mix and tenure
- Arboriculture

Following receipt of the consultee feedback, the Applicant sought to meet with you to discuss the comments in further detail, and we subsequently attended a virtual project team meeting on the 16th June. I trust that you will agree that the meeting was beneficial for all parties, in clarifying the suggested amendments to the scheme, and how we might address them. For the benefit of all stakeholders, I have provided a summary of the comments we have received to date below, and how we have subsequently sought to address them through a revised layout.

a. Layout, Scale & Appearance

The Entrance area

It was suggested that the entrance to the proposed second phase of North Park did not provide enough visual continuity to the Beckstones development, and that the proposed dwellings in this location turned their back and/or side to the Beckstones development and site entrance, presenting gable elevations, garages and parking areas to the site entrance, which was not considered a high quality gateway.

In clarifying these comments during the virtual meeting, it was acknowledged that changes to plots 1 and 22 could overcome your concerns. Having reflected on the feedback, we have now moved these dwellings back within their plot slightly, so that they align with the phase 1 build line. Windows have also been added to the gables to increase the visual interest in this area, as well as provide more activity and therefore passive surveillance. This seeks to address the concern regarding the quality of the elevations presented at the entrance to this second phase of development.

Notwithstanding these amendments, we continue to assert that the positioning of 'The Green' as you enter the site draws the eye and is the key focal point in the entrance area of Phase II, providing a great level of visual interest and soft landscaping.

The Courtyard

Comments were also received concerning the 'Farm Courtyard' character area, located in the north east corner of the site. Whilst it was suggested that no objection exists to the incorporation of a character area based on the adjacent farm courtyard; it was considered that the proposed form and layout did not appear to wholly align with the design character intended.

Upon further discussion, it was concluded that the use of the phrase 'Farm Courtyard' was generating inaccurate connotations for this character area. Nevertheless, it has been agreed that to create a more simplified form of development in this area, more typically associated with a courtyard, the garages and courtyard gateway walls in this area would be repositioned to reduce the visual prominence of the garages and move parking away from the frontages of the dwellings, to reduce the visual impact of parked vehicles.

We consider these amendments achieve a more simplified form and layout in this character area, befitting of a typical courtyard arrangement.

The Green & The Copse

It was noted in the meeting and reflected in the comments that the proposed provision of open space is supported, however comments were made regarding the useability, in practical terms, of The Copse

and The Green. It was questioned if the provision of a larger more useable space and a more secondary space could deliver benefits. In response to these comments, as noted at the meeting, we consider the size of both the 'Green' and the 'Copse' are designed to be perfectly formed, useable spaces suitable for informal play and gatherings for residents. A larger space would be akin to a park or football field, which would not provide benefits to the more general residential population of this scheme. In addition, a large open space provision is not required, in policy terms, and when considering that each detached dwelling is provided with a large, spacious garden.

These smaller pockets of green space are well over-looked by the dwellings surrounding them. This area of this scheme does also not receive any through-traffic, and as such, it is likely that residents will be able to easily enjoy the shared surfaces with low levels of traffic moving around the site at all times.

We note that the inclusion of single storey dwellings to the boundary with Rheda Park is supported, however a further comment was provided with regards to the use of one single storey dwelling type/design, which may appear to create limited design interest. In responding to this feedback, the Applicant has introduced a new house type, the Bannerdale. This complements the other bungalow house type, the 'Loughrigg', providing additional variation to the street scene.

Further, it was indicated that the two storey dwellings to Plots 11-13 have the potential to appear visually at odds with the surrounding development given the context of the single storey dwellings beyond. In response to this comment, the Applicant has amended Plot 11 to the Bannerdale house type, changing from a two storey to a single storey dwelling. This brings the height of the dwelling in line with neighbouring Plots 10 and 14-17. The dwelling has also been orientated to look north rather than northeast to create increased privacy to existing dwellings on Rheda Park.

In addition, it was suggested that a review of the layout of Plots 10-14 and Plots 20-22 should be conducted, with a view to rationalising the use of detached garages and their scale, to create an additional sense of spaciousness within the layout. The Applicant has considered this and the dwelling and garage of plots 12 and 13 are now handed, to reduce the visual impact of the garage and parked vehicles. The garages of Plots 20 and 21 have also been repositioned in order to reduce their visual prominence and move the parking away from the frontage of the dwellings.

Request for further detail

It was noted in the feedback that the lack of any sectional drawings and finished floor levels relative to the surrounding development have made it difficult to understand the proposed relationships and potential impacts of the new dwellings. Having reflected on this concern, we have instructed the production of sectional drawings and finished floor levels and provided these within the revised submission.

b. Landscape Design

Comments were received with regards to the landscaping of the scheme, which focussed on questioning whether additional woodland type planting to the boundaries of Rheda Park would improve screening and privacy, acknowledging that potential visibility between the existing and proposed dwellings is a key concern of the residents of Rheda Park, some of whom are raising objections to the development. We have provided some photographs showing the existing site boundary with Rheda Park which demonstrates that there are a significant number of trees already on-site and a substantial amount of screening, but it is acknowledged that there some gaps, which can be addressed through additional planting.

In response to this feedback, and following the discussion at the meeting, it was suggested that increasing vegetation at a 'personal' height is a priority, as opposed to increasing the provision of trees in aid of taller screening. As such, the landscape plan now shows a commitment to deliver a

substantial, semi-mature evergreen hedge along the site boundary, to soften the views between the existing and proposed properties.

Seating has also been added to the proposed scheme, located by the Courtyard, on The Green and besides the shared surface access road between The Green and The Copse. The use of planting throughout the site has also changed to further support and reinforce the character areas across the site, as opposed to being used to screen walls and garages.

c. Highways

Managed & adopted areas

The highways comments received covered a number of matters. Firstly, the Highways Officer identified that the managed area and adoption plan (Drawing No RHIS04) showed that the farm courtyard and link road to the courtyard area is to be offered for adoption. However it was noted that as the area will be designed in cobbles/stone sets, they felt this could become a maintenance issue, as refuse and HGV vehicles would have to use this area as a turning head which could cause the cobbles/ stone sets to become loose and misplaced over time.

Having discussed this matter with you during the meeting, the scheme has been amended; the area around the courtyard will be a tarmac surface, with the previously proposed 4 course cobbled edge removed from this area, however the courtyard itself will still be a cobbled surface, to reflect the character area. The updated managed area and adoption plan still shows that this area is intended to be adopted. The rationalised use of the cobbles should reduce the likelihood of maintenance issues, particularly as refuse vehicles will not have to enter the cobbled surface due to the design of the refuse collection strategy. In addition, the tracking plan provided demonstrates that vehicle tracking is possible and would not prevent adoption on this basis. Nevertheless, the areas proposed for adoption is not a material consideration with regards to the reserved matters and can be discussed and agreed with the Highways Authority in due course.

Change in material outside of Plot 13& 20

It was also noted by the Highways Authority that there was a change in material on the carriageway outside of plot 13 and 20 (site Plan Drawing No RHSI0), and the need for this was queried. During our meeting, we clarified that this was an intentional move to reinforce the different character areas across the site. Nevertheless, to rationalise the use of different materials across the site, this has been removed.

Refuse collection strategy

The Highways Authority also requested further information with regards to the refuse strategy. It was assumed that refuse bins would be collected outside each property, and if so, the Authority noted that we would need to ensure compliance with the turning area layout guidance within the Cumbria Development Design Guide. A vehicle tracking map was also requested. Having considered the strategy in further detail, we can now confirm that communal refuse points have been provided across the site, to ensure that waste refuse vehicles do not have to enter any of the private shared drives or cobbled surfaces. Shared refuse points are now provided for plots 2-6, 8-11 and 14-17. The refuse vehicle will park on the tarmac surface and refuse collectors will be able to drag the bins from the stores to the vehicle the remaining distance.

A tracking plan has also been provided for review by the Highways Authority.

Lighting Plan

It is also noted that the Highways Authority suggested we provide an early street lighting plan for review. However, following our discussions, it is noted that you are comfortable that we provide this

detail as part of the condition discharge stage, as it is not necessary to provide at the reserved matters stage.

Emergency Vehicle Access ('EVA')

The last comment received from the Highways Officer concerned the provision of an EVA, which they requested we consider, although it is not a requirement. At this point in time, as discussed at the meeting, the Applicant will not be providing an EVA on site.

d. Flood Risk & Drainage

Drainage Scheme

The Lead Local Flood Authority ('LLFA') provided comments on the application in May of this year, and recommended that the drainage scheme is considered concurrently with the reserved matters application, noting that drainage details can force the amendment of the layout of any development if not properly considered at an early stage in the process. United Utilities also provided comments to the application, and recommended a standard drainage management and maintenance condition. In response to the comments from the LLFA, we can confirm that the project team have instructed the production of percolation tests and a drainage strategy has been drafted. Finished Floor Levels have therefore been confirmed and a plan showing these has been provided by civil engineers, Asher Associates. The drainage strategy will be submitted for consideration as part of the discharge of conditions process, which sits independently to this reserved matters planning application.

Surface water run-off during construction

The Council's Flood and Coastal Engineer also raised the matter of adequately dealing with the problem of surface water runoff created during the construction phase, which was noted to be the subject of complaints from residents on the existing Rheda Park site during the construction of the first phase of development by Genesis Homes. The consultee therefore recommended the submission of a Construction Management Plan. This is acceptable to the Applicant and will be dealt with via discharge of condition 13 of the outline decision notice. The Applicant is committed to ensuring the delivery of this scheme (if approved) respects the amenity of existing residents throughout the construction process.

e. Housing Mix and Tenure

Comments received from the Housing Strategy Team confirmed that they are supportive of the proposed mix on site; they welcome the provision of bungalows, which are always in demand in the borough, and also the provision of larger, 'executive' style properties in the north of the borough, as identified in the latest SHMA. The proposed amendments to the scheme do not significantly alter the proposed mix; one additional bungalow has been added by replacing a four-bedroom property (The 'Skiddaw', Plot 11).

f. Arboriculture

The Officer reviewing the arboricultural information supplied with the application considered the proposed landscape scheme acceptable, and recommend a condition is attached to the planning permission to require the landscape plan to be implemented in full. We consider this request can be secured via a planning condition.

Whilst the Officer did not provide any criticism of the landscape scheme, you will note that we have updated the landscape proposals to reflect the wider comments received regarding the design of the scheme, as already noted above.

g. Policy Implications

Copeland Borough Council held a public consultation on the final draft of the new Copeland Local Plan 2021-2038 between January and March 2022. Since then, the draft plan has been formally submitted to the Secretary for independent public examination (in September 2022). Notwithstanding this, as the new Local Plan has not yet been adopted, the policy framework under which this planning application will be assessed has not changed.

The amendments to the scheme seek to address the consultee comments received to date, and ultimately improve the overall design. We therefore consider that the proposals still comply with the development framework, in particular, Development Management Policies:

- Policy DM10 - Achieving quality of place
- Policy DM11 – Sustainable development standards
- Policy DM12 – Standards for new residential development
- Policy DM21 - Protecting community facilities
- Policy DM22 – Accessible developments
- Policy DM24 – Development proposals and flooding
- Policy DM25 – Protecting nature conservation sites, habitats and species
- Policy DM26 – Landscaping
- Policy DM29 – Protection of trees

h. Summary

We trust that this letter is helpful in setting out the amendments that have been made to the scheme, and the justification for doing so. We understand that the submission of this new information will trigger a requirement for a period of re-consultation with statutory consultees and local residents. Should you have any questions or comments, please do not hesitate to contact me via mobile or email.

Yours sincerely,

Lucy Furber
SENIOR PLANNER

Encl.

Schedule 1 – list of revised application submission documents

Schedule 2 – list of scheme amendments

SCHEDULE 1. REVISED APPLICATION SUBMISSION DOCUMENTS

The revised submission package comprises of the following:

- Site Plan External Works. Drawing No. RH SI 01, Rev E (dated 7th July 2022)
- Parking Plan. Drawing No. RH SI 02, Rev E (dated 7th July 2022)
- Location Block & Title Plan. Drawing No. RH SI 03, Rev E (dated 7th July 2022)
- Managed Area & Adoption Plan. Drawing No. RH SI 04, Rev E (dated 7th July 2022)
- Proposed Double Garage Plans & Elevations. Drawing No. RH DG 02 (dated 28th June 2021)
- Finished Floor Levels. Drawing No. AA7281/03/SK01 (dated 31st August 2022) (prepared by Asher Associates)
- Courtyard. Drawing No. RH SI 05, Rev E (dated 7th July 2022)
- The Green. Drawing No. RH SI 06, Rev E (dated 7th July 2022)
- The Copse. Drawing No. RH SI 07, Rev E (dated 7th July 2022)
- Proposed Boundary Treatment. Drawing No. RH Ma 02 (dated 28th June 2021)
- Proposed Floorplan – The Loughrigg. Drawing No. RH Lo 02 (dated 28th June 2021)
- Proposed Elevations – The Loughrigg. Drawing No. RH L0 03 (dated 28th June 2021)
- Proposed Floorplan – The Blencathra. Drawing No. RH BI 02 (dated 28th June 2021)
- Proposed Elevations – The Blencathra. Drawing No. RH BI 03 (dated 28th June 2021)
- Proposed Floorplan – The Ellerbeck. Drawing No. RH EI 02 (dated 28th June 2021)
- Proposed Elevations – The Ellerbeck. Drawing No. RH EI 03 (dated 28th June 2021)
- Proposed Floorplan – The Ennerdale. Drawing No. RH En 02 (dated 28th June 2021)
- Proposed Elevations – The Ennerdale. Drawing No. RH En 03 (dated 28th June 2021)

- Proposed Floorplan – The Glaramara. Drawing No. RH GI 02 (dated 28th June 2021)
- Proposed Elevations – The Glaramara. Drawing No. RH GI 03 (dated 28th June 2021)
- Proposed Floorplan – The Grisedale. Drawing No. RH Gr 02 (dated 7th October 2021)
- Proposed Elevations – The Grisedale. Drawing No. RH Gr 03 (dated 28th June 2021)
- Proposed Floorplan – The Landgdale. Drawing No. RH La 02 (dated 28th June 2021)
- Proposed Elevations – The Langdale. Drawing No. RH La 03 (dated 28th June 2021)
- Proposed Floorplan – The Lingmoor. Drawing No. RH Li 02 (dated 7th October 2021)
- Proposed Elevations – The Lingmoor. Drawing No. RH Li 03 (dated 28th June 2021)
- Proposed Floorplan – The Skiddaw. Drawing No. RH Sk 02 (dated 28th June 2021)
- Proposed Elevations – The Skiddaw. Drawing No. RH Sk 03 (dated 28th June 2021)
- Proposed Floorplan – The Bannerdale. Drawing No. RH Ba 02 (dated 28th June 2021)
- Proposed Elevation – The Bannerdale. Drawing No. RH Ba 03 (dated 28th June 2021)

Plans prepared by Eden Environment Ltd

- Proposed Layout. Drawing No. 14 Rev. 09 (dated 3rd October 2022)
- Landscape Plan. Drawing No. 15. Rev. 08 (dated 12th October 2022)
- Planting Plan. Drawing No. 16. Rev. 05 (dated 3rd October 2022)
- Plant Specification & Schedule. Document No.17. Rev. 01 (dated 15th July 2022)
- Design Rationale. Document No. 18. Rev. 04 (dated 18th July 2022)
- Illustrative Cross Sections. Drawing No. 19 Rev 01 (dated 12th October 2022)

Additional Documents (previously submitted)

- Design & Access Statement, Rev 01, prepared by Site Evolution Ltd
- Materials Schedule. Rev 01, prepared by Site Evolution Ltd
- Highways Technical Note, Issue 03, prepared by Tetra Tech
- Planning Statement, prepared by Iceni Projects

SCHEDULE 2. LIST OF SCHEME AMENDMENTS

Plot No/ Location	Amendment	Reason
Plot 1	Dwelling location moved slightly back in plot	To align with Phase 1 build line
Plot 1	Addition of windows to gables	To provide passive surveillance and to increase visual interest on gable
Plot 1	Realignment of flanking walls (those between front and rear gardens)	To allow gable windows to overlook front garden areas
Plot 1	Slight reposition of garage	Associated with repositioning of dwelling
Plot 2	Reposition and reorientation of garage; amended driveway	To reduce visual prominence of garage and move parking from frontage of dwelling
Plot 2	Reposition of Courtyard gateway walls	Associated with repositioning of garage; walls reduce visual impact of parked vehicles
Plot 2	Dwelling location moved marginally forward in plot	Associated with repositioning of garage
Plot 3	No changes	N/A
Plot 4	Dwelling location moved marginally forward in plot	To avoid Root Protection Zone from existing tree to rear
Plot 4	Addition of windows to gables	To provide passive surveillance and to increase visual interest on gable
Plot 5	Dwelling and garage location moved marginally east	Associated with repositioning of garage to Plot 7
Plot 6	Dwelling and garage location moved marginally east	Associated with repositioning of garage to Plot 7
Plot 7	Reposition and reorientation of garage; amended driveway	To reduce visual prominence of garage and move parking from frontage of dwelling
Plot 7	Reposition of Courtyard gateway walls	Associated with repositioning of garage; walls reduce visual impact of parked vehicles
Plot 8	Dwelling and garage have been handed	To reduce visual impact of garage and parked vehicles; to increase visual contribution and prominence of dwelling in The Green character area
Plot 9	Dwelling and garage have been handed	To reduce visual impact of garage and parked vehicles; to increase visual contribution and prominence of dwelling in The Green character area
Plot 10	Dwelling location slightly amended	Associated with amendments to other plots
Plot 11	Dwelling type change - Bannerdale bungalow; change from two-storey to single-storey	Reduced height of dwelling is consistent with Plot 10 and Plots 14-17; orientated to look north rather than northeast with increased privacy to existing dwellings on Rheda Park; dwelling positioned to avoid Root Protection Zone from existing tree to rear
Road serving Plots 8-12	Road amendments	Alignment modified; width now 4.8m; turning head improved; service strip position improved
Plot 12	Dwelling and garage have been handed	To reduce visual impact of garage and parked vehicles; to increase visual contribution and prominence of dwelling in The Green character area
Plot 12	Addition of windows to gables	To provide passive surveillance and to increase visual interest on gable

Plot 13	Dwelling and garage have been handed	To reduce visual impact of garage and parked vehicles; to increase visual contribution and prominence of dwelling in The Copse character area
Plot 13	Addition of windows to gables	To provide passive surveillance and to increase visual interest on gable
Plot 14	Dwelling type change - Bannerdale bungalow	Dwelling orientated to look north rather than northeast with increased privacy to existing dwellings in Rheda Park; garage (without windows) positioned closest to existing dwellings in Rheda Park; dwelling design presents windows to road frontage
Plot 14	Additional screen planting to boundary with Rheda Park	To increase privacy to existing dwellings/gardens on Rheda Park
Plot 15	Dwelling type change - Bannerdale bungalow	Dwelling orientated to look into space between existing dwellings on Rheda Park to increased privacy to those existing dwellings; garage (without windows) positioned closest to existing dwellings in Rheda Park; dwelling design presents windows to road frontage
Plot 15	Additional screen planting to boundary with Rheda Park	To increase privacy to existing dwellings/gardens on Rheda Park
Plot 16	Dwelling type change - Bannerdale bungalow	Dwelling orientated to look into space between existing dwellings on Rheda Park to increased privacy to those existing dwellings; garage (without windows) positioned closest to existing dwellings in Rheda Park; dwelling design presents windows to road frontage
Plot 16	Additional screen planting to boundary with Rheda Park	To increase privacy to existing dwellings/gardens on Rheda Park
Plot 17	Dwelling location moved marginally westwards in plot	Associated with changes to garages and parking for Plots 20 & 21
Plot 18	Dwelling and garage location moved marginally westwards in plot	Associated with changes to garages and parking for Plots 20 & 21
Plot 19	Dwelling and garage location moved marginally westwards in plot	Associated with changes to garages and parking for Plots 20 & 21
Plot 20	Dwelling location moved marginally westwards in plot	Associated with changes to garages and parking for Plots 20 & 21
Plot 20	Reposition and reorientation of garage; amended driveway	To reduce visual prominence of garage and move parking from frontage of dwelling
Plot 21	Dwelling handed	To correct location of rear door
Plot 21	Reposition and reorientation of garage; amended driveway	To reduce visual prominence of garage and move parking from frontage of dwelling
Plot 21	Addition of windows to gables	To provide passive surveillance and to increase visual interest on gable
Plot 21	Realignment of flanking walls (those between front and rear gardens)	To allow gable windows to overlook front garden areas
Plot 22	Slight reposition of garage	Associated with repositioning of flanking walls
Plot 22	Addition of windows to gables	To provide passive surveillance and to increase visual interest on gable
Plot 22	Realignment of flanking walls (those between front and rear gardens)	To allow gable windows to overlook front garden areas