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Our Ref: 0438

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Dear Planning

PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT

Land at Salthouse Farm, Salthouse Road, Millom

This statement has been prepared by Stephenson Halliday Ltd on behalf of our client, Neil Price Ltd (the Applicant), to support an application for residential development consisting of no. 5 dwellings and associated works including formation of access, landscaping and drainage on land at Salthouse Farm, Salthouse Road, Millom (the Site). The application has been submitted to Cumberland Council (the former Copeland District) as the determining authority.

The application comprises the following submitted information alongside the appropriate planning fee:

- Planning Statement incorporating design and access (this letter);
- Drawing package prepared by Neil Price Ltd;
- Flood Risk Assessment prepared by Gadsden Consulting; and
- Preliminary Ecological Appraisal, Biodiversity Net Gain Assessment and completed metric prepared by South Lakes Ecology.

Background

The planning application follows pre-application engagement regarding the principle of new residential development on the Site between the Applicant and former Copeland Borough Council during 2023 and 2024. The Site benefits from an extant planning permission for residential development of no. 11 dwellings granted by Copeland Borough Council in February 2011 under reference: 4/10/2596/0F1. This application was a time extension to a previous permission granted on the Site (reference: 4/08/2030/0). Correspondence between the Applicant and a Copeland Borough Council planning officer confirms that a lawful commencement was made to 4/10/2596/0F1 by virtue of works undertaken on plot 1 consisting of the laying of foundations. This permission therefore remains extant.

Since the grant of this permission for no. 11 mostly semi-detached dwellings, market conditions and planning policy position have changed to the extent that the approved layout and housing mix proposed under the extant permission are no longer considered the most suitable or responsive to the character and setting of the Site nor the local housing market. The Applicant has therefore proposed a revised scheme through this application which is more responsive to the Site's locational context whilst building on the principle of residential development established under 4/10/2596/0F1.

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The Site and Surroundings

The Site relates to land at Salthouse Farm, Salthouse Road, Millom. Salthouse Farm is located to the north of the town centre of Millom and immediately east of the A5093. The Site itself is a parcel of grassland surrounded by Salthouse Farm to the north and east, a residential property called Colsberg and Aggie's Lonnin lane to the south, and the A5093 to the west. The Site is predominantly flat, except for a man-made earth mound located in the south west corner and is visible to the west from the A5093 by virtue of the lack of boundary vegetation. A traditional stone wall forms the western boundary to the A5093 and the northern boundary to the access road to Salthouse Farm. An agricultural building was previously located in the north east of the Site adjacent to Salthouse Farm, however this was dismantled between 2014 and 2015 as part of the site clearance works carried out pursuant to the extant permission.

The Site has an edge of settlement character being situated at the northern extent of the settlement of Millom with its residential suburbs located to the south. The surrounding land to the north, east and west is otherwise low-lying and agricultural with typical field patterns demarcated by hedgerows. The Duddon Estuary is situated some 600m to the east. The land begins to rise inland to the north west of the Site as one nears the Lake District National Park (LDNP), the boundary of which falls approximately 3.2km to the north west.

The Site is low lying and located in proximity to the Duddon Estuary and Salthouse Pool, and as such was formerly partly located within Flood Zones 2 and 3 in its south western corner. Updates were made to the government's flood risk map for planning in early 2025 with new data from the Environment Agency which confirms that the majority of the Site now falls within Flood Zone 1 with a very small portion of the south western corner being located in Flood Zone 2. Existing flood defences are located to the east of the Site along the Duddon Estuary to protect the town of Millom from tidal flooding. Notwithstanding this a Flood Risk Assessment (FRA) has been prepared in support of the application owing to the existence of flood risk and to take account of any increased risk in the future caused by the effects of climate change.

There are no environmental designations within the Site which consists mostly of modified grassland with limited ecological value. There are however areas of land within a 1km radius which are designated due to the presence of locally, nationally and internationally important habitats and species. The Duddon Estuary SSSI, Morecambe Bay and Duddon Estuary Special Protection Area (SPA) and Morecambe Bay Special Area of Conservation (SAC) are located 350m south east of the Site. The Millom Ironworks Local Nature Reserve is also located 1.7km to the south. A Preliminary Ecological Appraisal (PEA) has been prepared to support the application and is summarised below.

There are no designated heritage assets within the Site, nor does the Site fall within the setting of any nearby designated assets. Salthouse Farm comprises a number of traditional farm buildings, however these are not afforded any statutory protection and the design of the proposed development is sympathetic to the character of surrounding built and natural features, for example through the retention of traditional boundaries where possible.

The planning history of the Site relates to residential development already discussed earlier in this statement. The relevant applications are as follows:

- **4/06/2477/0** – *outline application for eight houses after demolition of farm buildings* – Approved 04/07/2006
- **4/07/2614/0** – *residential development consisting of eleven dwellings after demolition of farm buildings* – Withdrawn 26/09/2007

- **4/08/2030/0** – residential development consisting of eleven dwellings after demolition of farm buildings –Approved 03/04/2008
- **4/10/2596/0F1** – application for a new planning permission to replace an extant permission (4/08/2030/0) for residential development in order to extend the time limit – Approved 2/3/2011

The Proposed Development

The proposed development is residential development consisting of no. 5 detached dwellings and associated works including formation of access, landscaping and drainage. The principle of residential development on the Site has been established through permission: 4/10/2596/0F1 which remains extant and can be built out at any time. The revised scheme relates to a redesign in response to changing market conditions and planning policy position in Copeland (now integrated within Cumberland Council) since the extant permission was approved in 2011.

The proposed layout consists of detached two-storey 4-bedroom dwellings with private gardens, garage and driveway. It is considered this layout responds more appropriately to the Site and its edge of settlement character and will maintain a smoother transition between the built form and open countryside when compared with the extant permission. The housing mix is considered to be appropriate for the area and consistent with the relevant Strategic Housing Market Assessment Update carried out by Copeland Borough Council in 2021 which proposes a market housing mix of 20% 4+-bedroom to attract higher-earning households to the Borough.

A new access is to be formed to the east of the A5093 to the south of the existing farm access to Salthouse Farm. The new access has been the subject of pre-application engagement with Cumberland Council Highways Department and the design amended accordingly to deliver the requisite visibility and width to allow two vehicles to pass on entry and exist. A portion of the stone wall will be removed to create the access, however this will be reused on Site as part of the new boundary treatments.

Landscaping measures incorporated within the scheme include the planting of no. 5 native trees across the Site and new hedgerow along the western boundary to deliver an attractive frontage onto the road while retaining openness. The dwellings are also to be oriented with principal elevations to the west to strengthen the frontage along Salthouse Road. New native hedgerow will also be planted between the plots to provide appropriate separation and improve the overall aesthetic of the scheme.

In order to mitigate the risk of flooding at the Site, the FRA proposes a series of measures which will protect future occupants of the dwellings from the most severe flood events while also avoiding any increased risk of flooding to neighbouring land through surface water management. These measures are explained in detail in the FRA and include geocellular attenuation baskets and raised floor levels. Surface water will be drained from the Site via a new connection to Salthouse Pool. Foul drainage will utilise an existing connection in the south western corner of the Site.

Due to the spatially constrained nature of the Site and given that a large proportion of the area is dedicated to private garden and access, off-site biodiversity enhancements are proposed at a nearby site under the ownership and control of the Applicant at High Cross near Broughton-in-Furness. A total of 35 native trees are proposed to be planted at this off-site location to deliver the appropriate biodiversity enhancements. Further details of the baseline biodiversity of the Site and proposed on-site and off-site enhancement measures can be found within the submitted Preliminary Ecological Appraisal and Biodiversity Net Gain Report.

Planning Assessment

Planning law requires that applications for planning permission be determined in accordance with the adopted Development Plan unless material considerations exist which would justify a departure from this position. The Development Plan in this case comprises the Copeland Local Plan 2021-2039 (adopted November 2024) and proposals maps. The Copeland Local Plan serves as a guide for future development in the area of Cumberland falling with the former Copeland Borough boundaries.

The following Local Plan policies are considered relevant to the proposed development:

- Policy DS1 – Settlement Hierarchy
- Policy DS2 – Settlement Boundaries
- Policy DS4 – Design and Development Standards
- Policy DS7 – Sustainable Drainage
- Policy H1 – Improving the Housing Offer
- Policy H2 – Housing Requirement
- Policy H4 – Distribution of Housing
- Policy H6 – New Housing Development
- Policy H7 – Housing Density and Mix
- Strategic Policy SC1 – Health and Wellbeing
- Policy N1 – Conserving and Enhancing Biodiversity and Geodiversity
- Policy N3 – Biodiversity Net Gain
- Strategic Policy N6 – Landscape Protection
- Strategic Policy N9 – Green Infrastructure
- Policy N10 – Green Wedges
- Policy N14 – Woodlands, Trees and Hedgerows
- Policy CO4 – Sustainable Travel
- Policy CO5 – Transport Hierarchy
- Policy CO7 – Parking Standards

Principle of Development

The principle of residential development on the Site has been established through permission 4/10/2596/0F1 which remains extant. The presence of the extant permission represents a significant material consideration as a ‘fallback position’. Notwithstanding this the proposed development has been designed to respond to planning policy considerations relevant to the Site, as set out below.

The recently adopted Copeland Local Plan Proposals Map South demonstrates that the Site falls within the settlement limits of Millom which is defined as a Key Service Centre with a range of accessible services. Policy DS2 Settlement Boundaries supports development within defined settlements in principle where it otherwise accords with the Development Plan. Key Service Centres are described as self-sufficient and suitable locations for medium scale housing extensions, windfall and infill development in Policy DS1 Settlement Hierarchy. Policy H4 Distribution of Housing identifies a requirement for 30% of all new housing over the plan period to be delivered in Key Services Centres.

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The Site also falls within an area of 'green wedge' which encloses Millom to the north, west and south. Policy N10 Green Wedges explains that development will only be permitted in such locations where:

- *“the open character of the Green Wedge and separation between settlements is maintained; and*
- *its functionality and the special characteristics and quality of the landscape are conserved and enhanced.”*

The Site is well contained by existing built development to the north through Salthouse Farm, and to the south through the current residential limits of Millom, thereby creating a sense of infill development. It has limited aesthetic value by virtue of the absence of any notable natural features and the earthworks which have been undertaken pursuant to the extant permission. Separation distances between settlements will be maintained and there will be a negligible impact on the character and function of the Green Wedge which is derived from the wider expanse of open grazing land enclosing the settlement to the north and west. The Site itself makes a limited contribution to the wider Green Wedge in this sense and its development will not unduly encroach into the countryside surrounding Millom.

Furthermore the proposed development offers a revised design and layout to that approved under the extant permission which is demonstrably more suitable in the context of the edge of settlement character of the Site and Green Wedge designation. The no. 5 dwellings will be detached with large private garden areas which is a more appropriate layout for the edge of settlement location than semi-detached and higher density housing and will contribute to a smooth transition between settlement and open countryside, therefore maintaining the coherence of the Green Wedge and avoiding any sense of overdevelopment. The existing residential development to the south of the Site consists predominantly of detached low density dwellings with large gardens and strong road frontage and it is considered the proposed development will relate well to this through its design and layout.

The design and layout of the proposed development will ensure no undue impacts on the amenity of existing land uses in vicinity of the Site through appropriate separation distances and boundary treatments including landscaping. The nearest existing residential property is located at Colsberg and it can be observed through the proposed site layout (P103 P1 Site Layout Plan) that there will be no overbearing effects or loss of privacy or light for the occupants of this property as a result of the proposed development, due to the dwellings being set back from the site boundary. The proposed development comprises detached 4-bedroom dwellings with private gardens and off-street parking which will ensure acceptable levels of comfort and privacy are delivered to satisfy the reasonable aspirations of future occupants. The proposed development therefore sufficiently addresses the criteria of Policy H6 New Housing Development.

As discussed in relation to the Green Wedge designation, the Site currently makes a limited contribution to the character of the surrounding landscape, being enclosed by built development and separated from the wider expanse of grazing land and farmsteads to the north and east. Its sympathetic development will therefore not unduly erode the character of the surroundings and will not cause a noticeable encroachment into the countryside. The new hedgerow and tree planting will also ensure that the proposed development responds appropriately to prevailing landscape character which is derived from traditional field patterns and isolated farmsteads and therefore complies with Strategic Policy N6 Landscape Protection, Policy N9 Green Infrastructure and Policy N14 Woodlands, Trees and Hedgerows. The precise details of the landscaping measures such as

species mix and a maintenance plan could be secured through an appropriately worded planning condition should consent be granted.

As discussed earlier in this Statement, the housing mix included within the proposed development is considered suitable for the character of the Site and the findings of the most recent SHMAA which was updated in 2021 for the former Copeland Borough. The SHMAA envisages a future market housing mix of 20% 4+-bedroom houses and the Site's edge of settlement location lends itself to larger family houses with private gardens in keeping with existing neighbouring development. The proposed development therefore complies with Policy H7 Housing Density and Mix which seeks an appropriate housing mix in new developments in line with evidence presented in the SHMAA. The proposed development is a viable scheme which will deliver new market housing which will contribute to achieving the aims of Policy H1 Improving the Housing Offer and Policy H2 Housing Requirements.

Highways and Access

The proposed development includes the provision of a new highway access off the A5093 Salthouse Road to the south of the existing access to Salthouse Farm. The provision of a new access will reduce the likelihood of conflict arising between farm vehicles and vehicles accessing the new dwellings by isolating these movements. Cumberland Council as the Local Highways Authority has been consulted during the preparation of the revised layout and its advice in relation to visibility and access width taken on board in the proposed development. Access to the proposed development will be suitable for the vehicle movements associated with 5 dwellings and will ensure safe ingress and egress through adequate visibility in both directions. Impacts on the wider highway network as a result of no. 5 additional dwellings are considered negligible as the local road network has sufficient capacity to accommodate the minor increase in vehicle movements, which will be lower than those associated with the extant permission for 11 new dwellings. The proposed development therefore complies with Policy DS4 Design and Development Standards with regard to its impact on the highway network.

Ecology and Biodiversity

A Preliminary Ecological Appraisal (PEA) has been prepared in support of the application which has assessed the habitats present on the Site and the likelihood for protected species in the vicinity to be impacted as a result of the proposed development.

A habitat survey was carried out on the Site and, where possible, on all adjacent land and field parcels in February 2024 and revisited in February 2025. A zone extending to 300m from the development footprint was surveyed from public rights of way and access land to establish whether any ponds likely to support great crested newts or natterjack toads were present.

The PEA concludes that the Site comprises modified grassland with very limited ecological value and limited connectivity to surrounding habitats, due to the presence of existing surrounding development such as road infrastructure which acts as a barrier to movement. Consequently the proposed development will have a negligible impact on protected and notable species and will not disrupt any existing habitat linkages, and therefore complies with Strategic Policy N1 Conserving and Enhancing Biodiversity and Geodiversity.

The PEA incorporates a Biodiversity Net Gain (BNG) Assessment in line with statutory requirements relating to BNG which are reiterated in Strategic Policy N3 of the Copeland Local Plan. Due to the size of the Site and nature of the proposed development comprising new dwellings and private garden areas, the delivery of the full 10% BNG is not feasible within the Site itself. In addition to

measures on-site, off-site enhancements comprising the planting of no. 35 native trees are proposed for a nearby site at High Cross Brow LA20 6ES which is under the ownership of the Applicant. The proposed on-site enhancements include no. 5 native trees and new hedgerow planting to provide additional habitat and improve connectivity. Overall, the proposed development is anticipated to deliver an uplift of 18.7% in habitat units which significantly exceeds the statutory requirements and complies with Policy N9 Green Infrastructure and Policy N14 Woodlands, Trees and Hedgerows.

Flooding and Drainage

The Site is located on low lying land (5.75m - 8.2m AOD) in the proximity of the Duddon Estuary and Salthouse Pool and as such a Flood Risk Assessment (FRA) has been prepared in support of the application owing to the presence of flood risk. The government's flood risk map for planning was updated in 2025 by the Environment Agency and the Site is now largely within Flood Zone 1, which has a low risk of flooding from rivers and the sea, with a very small area of the south western corner being located in Flood Zone 2. This area will remain as grassland and will not be developed. Isolated patches of the Site are shown to be at risk of surface water flooding. The Duddon Estuary benefits from existing flood defences which provide some protection to existing development in Millom.

Pre-application engagement with Senior Planning Officer, Christie Burns, confirmed that the sequential and exceptions tests are not required to be carried out for the proposed development given the existence of the extant permission. It is noted that the proposed development falls within the 'more vulnerable' category for flood risk purposes as set out in the NPPF, however these uses are deemed acceptable in Flood Zones 1 and 2. Notwithstanding this, the FRA proposes engineering solutions to ensure future occupants of the dwellings are not unduly exposed to flood risk through testing the most extreme flood scenarios allowing for the effects of climate change. The mitigation measures incorporated within the design will also ensure no increase in flood risk to neighbouring land uses through management of surface water run-off.

The modelling carried out in the FRA demonstrates that the most critical flood levels for the Site are from tidal flooding at 6.19m AOD taking account of existing flood defences in a 0.5% scenario with the effects of climate change and sea levels rise. This effectively means parts of the south western corner of the Site would flood in the tested scenario. To mitigate, finished floor levels in the proposed new dwellings will be raised to a minimum of 6.79m AOD which provides a 600mm freeboard above the critical flood level in line with guidance. The proposed development is therefore consistent with the aims of Strategic Policy DS6 Reducing Flood Risk.

A proposed drainage scheme has been incorporated into the design to ensure surface water run-off is managed and does not cause any increased risk of flooding to neighbouring land. Geocellular baskets will be installed across the Site and flow will be managed with vortex control devices with discharge into Salthouse Pool to the south west. Soakaway testing has been carried out on the Site which has found infiltration to be unsuitable, therefore the hierarchy for surface water management as set out in Policy DS7 Sustainable Drainage has been followed appropriately. The attenuation features have been designed to a return period of 100 years taking account of the effects of climate change and urban creep.

The measures proposed to reduce the risk of flooding and manage surface water run-off from the Site can be secured through appropriately worded planning conditions.



Design and Access Statement

This section sets out the principles which have influenced the design of the proposed development and the approach taken in relation to access. The detailed design of the proposed development can be observed through the submitted drawing package which should be understood in conjunction with the descriptions contained herein. It is recognised that the Site, while relatively small in area and well-contained, occupies an important position at the northern limits of Millom adjacent to the A5093 which forms a principal route into and out of the town. The design has therefore been shaped to respond to this and provide a visual coherence which will avoid disrupting or disturbing the existing settlement and landscape character as appreciated by users of the A5093.

The former Copeland Borough Council is in the process of developing a design guide Supplementary Planning Document (SPD) with a draft document expected in the late summer or autumn. As such, no local guidance relating to design has been available to inform the proposed development. Notwithstanding this the design has been shaped to respond to local distinctiveness where possible and to the requirements set out in Policy DS4 Design and Development Standards and Policy H6 New Housing Development. As discussed earlier in this statement, the layout consists of detached dwellings to reflect the edge of settlement character of the Site which can be observed in neighbouring residential development to the south.

The traditional stone wall which forms the western site boundary has also been retained as far as possible to preserve the existing landscape character and boundary treatments. The short section of wall which requires removal to form the site access will be reused on-site to preserve the traditional features of the Site and its agricultural character as was requested by the LPA during pre-application discussions. The glazing, materials and finishes are otherwise suitable for a development of this nature and relate well to the character of established housing development to the south. The proposed dwellings will also be fitted with solar PV panels to the roof to maximise solar gain and energy efficiency. A suitably worded planning condition could be attached to any grant of planning permission requesting full details of external finishes prior to development commencing.

The proposed development also includes landscaping measures to preserve and enhance the existing landscape character. No. 5 native trees will be planted on-site with new hedgerow planting along the western boundary to improve the visual aesthetic of the scheme and respond to the character of the surrounding agricultural land which is derived from traditional field patterns and boundary hedgerows.

Access to the Site will be taken via a newly constructed junction from the A5093 to the south of the existing access to Salthouse Farm. Cumberland Council Highways Department has been consulted on the proposals for a new access to the proposed development and has offered support subject to the provision of the requisite junction width and visibility. These comments have been taken on board in the final design for the proposed development to ensure the safe ingress and egress of vehicles. A new access is preferred to the existing farm access to avoid conflict between farm vehicles and future occupants of the proposed dwellings. The proposed dwellings will benefit from off-street parking for no. 2 vehicles in addition to a covered garage which will provide ample space for vehicle parking to meet the needs of future occupants in accordance with Policy CO7 Parking Standards.

The proximity of the A5093 provides good access for future occupants to services and employment opportunities in Millom and other towns and villages in the wider area. The Site is also within walking distance of Millom's town centre, the local secondary school, railway station and recreational

facilities. An existing footway runs alongside the A5093 into the town centre which is lit to the south, with the railway station and bus stop (for the M1 and 7 services) accessible via a 10 minute walk. The proposed development is therefore consistent with Strategic Policy SC1 Health and Wellbeing, Policy CO4 Sustainable Travel and Policy CO5 Transport Hierarchy.

Conclusion

The proposed development is for no. 5 new dwellings on land at Salthouse Farm, Salthouse Road, Millom. The Site has few environmental constraints and falls within the settlement boundary of Millom which is recognised as Key Service Centre in the Copeland Local Plan. The Site benefits from an extant permission for residential development (reference: 4/10/2596/0F1) and as such the principle of development of the Site for residential use has been demonstrated and the extant permission is a significant material consideration.

The policy context at a local level has developed in the time since the extant permission was approved and this has been acknowledged and taken on board in the current proposal. As shown on P103 P1 Site Layout Plan, the proposed development responds to the new Green Wedge designation through a less dense layout with fewer units which are now detached with larger garden areas. The revised design will ensure the integrity and coherence of the Green Wedge and the local landscape character at the northern edge of Millom are preserved, while bringing forward a viable new housing development on the Site which is responsive to local housing market conditions.

This statement has also demonstrated that the proposed development will not have any unacceptable adverse impacts on the local environment or sensitive receptors through careful design supported by technical assessment work. Engineering solutions such as raised floor levels and attenuation baskets to manage surface water flow have been proposed to mitigate flood risk taking account of future impacts of climate change. The measures will ensure that future occupants are not exposed to unacceptable levels of flood risk and that there will be no increase in flood risk to neighbouring land.

The Site itself has been assessed as having limited ecological value and is detached from nearby habitats by virtue of existing physical barriers. The statutory BNG uplift can be achieved through a combination of on-site and off-site measures on land under the control of the Applicant. New landscaping on-site including hedgerow and tree planting will contribute to enhancing the local landscape character which is derived from the edge of settlement location and transition to open agricultural land to the north with traditional field patterns. The design will ultimately provide a pleasant frontage for those entering and leaving Millom along the A5093.

In light of the above, it is considered that the planning application should be approved without delay. We welcome the opportunity to discuss the proposal during the course of determination.

Yours faithfully

Dominic Brown
Graduate Planner