

Planning Statement

Cleator Moor Road
Whitehaven
CA28 8TR

SECTION 1: INTRODUCTION

1.1 This Planning Statement has been prepared for Gleeson Regeneration Ltd to support the detailed planning application for residential development on Cleator Moor Road, Whitehaven. The purpose of this statement is to set out the planning case in support of the development of the site, and it should be read in conjunction with the plans and other supporting documentation listed below:

- Design and Access Statement;
- Construction Management Plan
- Economic benefits report
- Ecological Assessment
- Tree Survey
- Flood Risk Assessment & Drainage Strategy
- Geo-environmental Appraisal
- Transport Statement

1.2 Section 2 of this Statement will introduce the proposed development and set out the site's context, and Section 3 will set out the planning policy context against which the application must be considered and undertakes a planning assessment of the proposed development, and Section 4 will draw together the conclusions.

1.3 The application site is identified on the red line site location plan and comprises approximately 1.21 hectares (2.99 acres) of land at Cleator Moor Road, Whitehaven. Gleeson Homes have agreed to purchase the site from Pathfinding Ltd to develop it for residential use.

SECTION 2: THE APPLICATION SITE AND PROPOSALS

- 2.1 The application site is situated within an established residential area and is close to local amenities including schools and shops, as well as Whitehaven town centre.
- 2.2 The site is currently disused brownfield land following the demolition of the Sekers factory in 2010. The site is relatively flat and is bound by Cleator Moor Road to the north east, residential properties to the south east, further brownfield land to the south west and The Gables care home to the north west. Access to the site is from the existing footpath running parallel to Cleator Moor Road.
- 2.3 The site is situated 1.5 miles from the town centre of Whitehaven. Whitehaven is a large town with a population of circa 25,000 people and is the principal town in Copeland. The town has a good range of amenities including train stations, offices, hospital, supermarkets, a variety of high street shops, museums, marina, cinema etc
- 2.4 The A595 which runs through Whitehaven can be joined half a mile from the site and provides easy access south to Egremont, Sellafield and north towards Carlisle. The A595 links to the A66, 9.5 miles north of the site which connects to Penrith and Junction 40 of the M6 to the east. The nearest train station is Corkickle train station 1.5 miles away and there are numerous bus stops within easy walking distance of the site.
- 2.5 A number of schools are within close proximity. The site is located immediately adjacent to Whitehaven Academy which achieved an 'Outstanding' Ofsted rating and just 0.4 mile south of St Benedict's Catholic High School, which achieved a 'Good' Ofsted rating. There are also two primary schools within 1 mile of the site (Hensingham Primary School and Jericho Primary School) both of which have achieved a "Good" Ofsted rating.
- 2.6 In summary therefore, the site is situated within a long-established residential neighbourhood that is within easy reach of a broad range of community facilities and which is also easily accessible both by public and private modes of transport.
- 2.7 Accordingly, in designing the layout at the centre of this application, inspiration has been taken from these positive characteristics. In addition, these attributes also serve to highlight the site's suitability and sustainability as a location for a new build housing scheme.

- 2.8 The area is predominantly characterised by well-established two-storey properties and therefore it is felt that any development on this site should be 2 storey in order to provide the same theme.
- 2.9 The development proposed by this planning application seeks approval for the construction of 37no. family dwellings on the site, comprising a mix of four 2-bed, 19 3-bed and ten 4 bedroom semi-detached and detached dwellings. Access to the site will be taken from Cleator Moor Road on the north-eastern boundary of the site.
- 2.10 Within the site, the dwellings will front onto the main estate road. All proposed properties will have a minimum of two off-street car parking spaces. All plots will have ample outdoor open space in the form of generous rear gardens, also with areas to the front of properties.
- 2.11 We have received pre application advice from the council which we have adhered to in our design. The main suggestions received were to:
- Maintain a parallel ridgeline to Cleator Moor Road, ensuring good road frontage.
 - Provision of open space located centrally within the site.

These have now been incorporated into our design with full parallel ridgelines to Cleator Moor Road and a central area of well overlooked open space.

SECTION 3: PLANNING POLICY CONTEXT AND ASSESSMENT OF PROPOSED DEVELOPMENT

National Planning Policy

National Planning Policy Framework (“NPPF”)

- 3.1 The NPPF was first published on 27th March 2012, followed by a revised version which was published in July 2018. This was then superseded by the latest version on 20th July 2021. The NPPF is a material consideration for all planning applications. The key aim of the NPPF is to proactively deliver sustainable development to support the Government’s housing and economic growth objectives and deliver the development which the country needs.
- 3.2 There are a range of policies which are of relevance to accompany a planning application. However, the cornerstone of the NPPF is the presumption in favour of sustainable development (paragraph 11). In respect of decision-taking, the NPPF is unequivocal that this means:

“....approving development proposals that accord with the development plan without delay...”(paragraph 11c)

Planning applications which propose sustainable development should therefore be approved immediately.

3.3 Infrastructure and planning gain

- 3.3.1 **Paragraph 34** states plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not make development unviable and should be supported by evidence to demonstrate this. Plans should also set out any circumstances in which further viability assessment may be required in determining individual applications. It should be noted that Paragraph 34 could conflict with any Infrastructure improvements that could be requested to be funded by the development by either the local planning authority or the County Council in the absence of an up to date local plan. In this application, the Local Lead Flood Authority has requested a contribution of £96,000 to upgrade the local surface water network, which the applicant has agreed to.

3.4 Affordable Homes

3.4.1 **Paragraph 65** states that:-

Where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

3.4.2 However **Paragraph 58** states: *Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.*

3.4.3 The application is accompanied by a Financial Viability Assessment (FVA) from the consultant Cushman and Wakefield. This report highlights the viability constraints affecting the site and that there is a need for the LPA to consider flexing their policy requirements in order to support the delivery of the proposed scheme. Viability aims to strike a balance between the aspirations of the landowner, developer and the LPA as noted in the PPGV (Paragraph 10). The FVA details the viability with 10% affordable housing on the site, and no affordable housing contribution. This FVA had been analysed by a further consultant on behalf of the Council, who have agreed with the submission.

3.5 Efficient use of Land

3.5.1 **Paragraph 124** States planning policies and decisions should support development that makes efficient use of land, taking into account:

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

- local market conditions and viability;
- the availability and capacity of infrastructure, services and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places.

3.5.2 **Paragraph 125** elaborates on **Paragraph 124** and states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. Furthermore local planning authorities should refuse applications which fail to make efficient use of land.

Copeland does have policies to optimise the use of their land (see paras 3.10 to 3.10.5 below) which are therefore in line with the NPPF (2021). The Council, at present, does have a 6.35 year land supply (Copeland Borough Council position Statement November 2020). Therefore, the development has been provided at a density to satisfy both the NPPF (2021) and the Local Plan.

3.6 **Paragraph 120** states that Planning Policies and Decisions should.... Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The application is in accordance with this given that it is previously development land and within the principal settlement in the Borough.

3.7 **Paragraph 218** confirms that the NPPF is a material planning consideration that should be taken into account from the date of publication. Furthermore, it suggests planning policies of local Councils should be revised to reflect the NPPF. However, paragraph 219 states existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF but due weight should be given to them, according to their degree of consistency with the NPPF (the closer the policies in the local plan to the policies in the NPPF the greater the weight that may be given.)

The NPPF supports and promotes sustainable development. This housing development proposal includes a range and choice of housing within the town of Whitehaven, which benefits from a choice of local shops, services, employers, community facilities and excellent transport links to Workington, Egremont, Sellafield and the wider region. This proposal can therefore be considered to comply with the aims of the NPPF.

Local Planning Policy

Copeland Local Plan 2013-2028 (“Local Plan”).

- 3.8 The Local Plan was adopted in December 2013 and sets out a long-term spatial vision and strategic objectives to support Copeland’s vision which is “Working to improve lives, communities and the prosperity of Copeland”. Although it was adopted before the updated NPPF (2021) it was adopted after the first NPPF that was published in March 2012 and therefore closely follows the principles of sustainable development, as defined by national policy and delivering sustainable housing in accordance with that policy.

3.9 Principle of Residential Development

- 3.9.1 Policy SS1 seeks to improve the housing offer of the borough by, amongst other things, by allocating housing sites to meet local needs in locations attractive to house builders.

Following the adoption of the Local Plan, the Council issued the Preferred Options document in January 2015 (Preferred Options 2015) which was a consultation document on where Copeland’s allocated housing site should be in the future. The Council has yet to submit an allocated housing plan to the Planning Inspectorate following the adoption of the Local Plan but weight can be attached to this policy document as it has been out for public consultation and was intended to build on the Local Plan and Policy SS1 to identify sites that:-

- Meet the needs of the Local Plan and the NPPF (2012)
- Provided sustainable development
- helped to meet the needs of Copeland and provide a sound basis for economic growth

- 3.9.2 The land was put forward as a proposed allocated housing site (Sekers Factory site – reference WE7) and was found to meet the above tests. Furthermore residential development is directed

towards Egremont as one of Copeland's Key Service Centres. The site is within the town's settlement boundary and therefore the principle of residential development is supported by both the NPPF and the Local Plan.

3.9.3 Policy SS2 of the local plan is regarding sustainable housing growth. This states: House building to meet the needs of the community and to accommodate growth will be provided for by.... Seeking to achieve 50% of new housing development on previously developed 'brownfield' sites. In addition, paragraph 5.3.12 further explains the strategy, stating it was intended to focus attention of the regeneration potential of previously-developed land and buildings in the most sustainable locations such as Whitehaven, which this is in.

3.10 Scale of proposed development

3.10.1 It is proposed to provide 37 dwellings on the site of 1.21 hectares. Therefore, the proposed scale of development is 31 dwellings per hectare.

3.10.2 The scale of the proposed development is proportionate to the town of Whitehaven and will contribute towards the town's proposed contribution of 30 dwellings a year at this stage of delivery within the Local Plan. Therefore, this proposal will enhance delivery in the key town of Whitehaven.

3.10.3 **Policy SS2** states the Council will seek densities of over 30 dwellings per hectare, with detailed density requirements determined in relation to the character and sustainability of the surrounding area as well as design considerations. **Policy DM11** builds on **Policy SS2** stating development should be at least 30 dwellings per hectare.

3.10.4 This site is in a built up area of Whitehaven and does not have an open character with the site being bound by Cleator Moor Road to the north east, residential properties to the south east, further brownfield land to the south west and The Gables care home to the north west. The proposed scale ensures there is a density level that is reflective of neighbouring sites, makes efficient use of an edge of town site and helps the Council meets its targets by providing housing in a central, accessible location close to the centre of Whitehaven.

3.11 Housing Mix

3.11.1 The development proposes a varied and complementary mix of 9 different house types including 2-, 3- and 4-bedroom accommodation. Private amenity space within each residential curtilage is commensurate to the size of each dwelling and the character of the area. The development will meet a range of housing needs and aspirations.

3.11.2 **Policy SS3** requires housing development proposals to demonstrate how the proposal helps to deliver a range and choice of good quality and affordable homes for everyone. This is assessed by how well a proposal meets the identified needs and aspirations of the Borough's individual Housing Market Areas as set out in the Strategic Housing Market Assessment (SHMA). The aim of the policy is therefore to:-

- Create a more balanced mix of housing types and tenure within that market area, in line with the evidence provided in the SHMA;
- Include a proportion of affordable housing which makes the maximum contribution (consistent with maintaining the viability of the development) to meeting identified needs in that market area.
- Establishing a supply of sites suitable for executive and high quality family housing, focussing on Whitehaven and its fringes as a priority
- Ensuring that housing meets special needs, for example those of older people where there is a genuine and proven need and demand in a particular locality.
- Providing housing for specific groups where there is housing need, including temporary workforce, agricultural workers and key workers.

3.11.3 In terms of the housing offer for Whitehaven the housing stock is described in the local plan as:-
a high dependency on social and private rented accommodation and a lack of good quality, desirable housing of choice. (para 8.3.6 Local Plan)

3.11.4 Furthermore the SHMA 2014 identifies a demand for two bedroom and three bedroom properties. The proposed development fills this gap by predominantly providing modern 2 bed and 3 bed semi detached homes to get people on the housing ladder, three bedroom detached homes ideal for starting families and a four bedroom home that will provide residents of Whitehaven to move up the housing ladder.

3.11.5 Gleeson ensure further affordability and availability to members of the local community within the open housing market by employing a number of initiatives, including the company policy that

properties are not sold to investors and are therefore available to address local housing need. This therefore ensures that on the proposed development, a range of housetypes will be available to contribute towards meeting the aspirations of various sections of the local housing market, including first time buyers who often struggle to get onto the housing ladder. 15 of the proposed homes are projected to be affordable to a couple on the National Living Wage, which would consist of 4x 2 bed semi-detached dwellings. and 11x 3 bed semi-detached dwellings.

3.11.6 In addition, Gleesons currently offering the below deals to first time buyers:

- A 5% deposit match;
- Free incentives such as flooring.

Gleesons also offer £1500 incentives for key workers and people working in armed forces.

3.12 Design and Landscape

3.12.1 Policy DM10 states the Council will expect high standard of design and the fostering of 'quality places' and development proposals will be required to:-

- Respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through an appropriate size and arrangement of development plots, the appropriate scale and massing of houses;
- Incorporate existing features of interest including local vernacular styles and building materials;
- Address vulnerability to and fear of crime and anti-social behaviour by ensuring that the design, location and layout of all new development creates clear distinctions between public and private spaces, overlooked routes and spaces within and on the edges of development;
- Create and maintain reasonable standards of general amenity.

3.12.2 The above principles have been taken into account in the design and layout of the proposed development by:-

- integrating the street layout neighbouring streets such as Queens Close,
- utilising local design features found in the area, such as the flat frontage suggested by the Planners at the pre-application advice stage.
- A housing density at gross circa 31 dwellings per hectare represents an overall efficient use of land that does not contrast with local density levels.

- Providing distinct area of public and private space and ensuring that public space and routes are overlooked.

3.12.3 The proposed layout is arranged with dwellings overlooking public realm areas. Private parking areas are positioned so as to be highly visible by new dwellings. Plot boundaries are to be clearly delineated through legible public rights of way and plot landscaping. This will all help mitigate against a fear of crime or antisocial behaviour. Furthermore, the use of gravel driveways will act as a deterrent that is highly recommended by the Police's Official Security Initiative – Secured by Design. Unlike traditional driveway surfaces, such as asphalt or concrete, gravel emits a loud crunching sound when it is walked upon or driven across.

3.12.4 **Policy DM12** requires new build residential properties to have:-

- a separation distance of at least 21 metres between directly facing elevations of dwellings containing windows of habitable rooms
- a separation of at least 12 metres between directly facing elevations of dwellings containing windows of habitable rooms and a gable or windowless elevation

3.12.5 The site has been designed to comply with the above separation distance between both proposed and existing properties.

3.12.6 A comprehensive Design and Access Statement has been produced that suitably explains the proposed design of the development in greater detail.

3.12.7 **Policy DM26** states all development proposals will be assessed in terms of their potential impact on the landscape. Developers should refer to the Cumbria Landscape Character Assessment and Cumbria Historic Landscape Characterisation documents for their particular character area and design their development to be congruent with that character. As this proposal is situated within the built up area of Whitehaven it has not been given a landscape character type.

3.12.8 The proposal at Cleator Moor Road creates a highly attractive built environment that correlates with the neighbouring developments. It will help boost the overall area, provide much needed modern affordable two, three and four bedroom homes and protect the wider landscape by focussing development on a central town location.

3.13 Drainage and Flood Risk

3.13.1 **Policy DM24** states where a proposed development is likely to be at risk from flooding or increases risk of flooding elsewhere, a Flood Risk Assessment (FRA) will be required to be submitted as part of the planning application. Development will not be permitted where it is found that there is an unacceptable risk of flooding; or the development would increase the risk of flooding elsewhere.

3.13.2 The development area is located within a Flood Zone 1 in which the NPPF recognises that all uses types are therefore appropriate. Surface water sewer systems are proposed to accommodate the 1:100 year event plus a 40% allowance for climate change in accordance with 2016 requirements.

3.13.3 The proposed detailed surface water and foul water drainage has been developed with prior liaison with both United Utilities and the Lead Local Flood Authority. Attenuated pipes and basin will appropriately attenuate water flow from the site. The proposals will not increase flood risk elsewhere but will instead create betterment on existing greenfield runoff volumes factoring in climate change allowance. The drainage proposals do not impact upon any interests of acknowledged importance and shall help reinforce this sustainable development, in accordance with local plan **Policy DM24**. In addition, the former Cumbria County Council, in their capacity as Local Lead Flood Authority, have requested a contribution of £96,000 from the applicant to upgrade the surface water network in the area, which the applicant has agreed to. For more detailed information and analysis please refer to the Flood Risk Assessment and Drainage Strategy.

3.14 Access and Transport

3.14.1 **Policy DM12** requires housing development to provide a car parking provision in accordance with adopted residential parking standards. Cumbria Highways have provided a Cumbria Development Design Guide but there are no adopted parking standards. The guidance provides a suggested level of parking for housing development. It should be noted that it states that developments may prove acceptable without offering parking levels as suggested as each site will be judged on its merits and context. The guide suggests that 2 bed houses should provide 2 parking spaces and 3/4 bed houses should provide 2.5 parking spaces. Furthermore that 1 visitor space for every 5 dwellings should be provided. This equates to 101 parking spaces throughout the development.

3.14.2 The proposed layout provides 101 parking spaces excluding garages and 121 spaces if garages were included.

3.14.3 **Policy DM22** requires development proposals to be accessible to all users by providing convenient access into and through the site for pedestrians, cyclists and disabled people, access for emergency and service vehicles, meeting adopted car parking standards which reflect the needs of the Borough in its rural context. Where necessary the potential transport implications of development will be required to be supported by a Transport Assessment and a Travel Plan to manage any significant transport implications.

3.14.4 The development benefits from the existing highway and footpath network that provides convenient access into Whitehaven town centre. Furthermore, the site is well connected to the local and regional transport network.

3.14.5 The proposal therefore meets the aims of local plan policies **DM12** and **DM22**. For further information please see the Transport Statement that support this planning application.

3.15 Ecology and Trees

3.15.1 **Policy DM25** states that all development proposals should protect the biodiversity value of land and buildings minimise fragmentation of habitats. An independent Ecological Appraisal was carried out to assess the impact of the proposed development on biodiversity and it was found to have no negative impact.

3.15.2 **Policy DM28** requires development proposals which are likely to affect any trees within the Borough will be required to include an Arboricultural assessment as to whether any of those trees are worthy of retention and protection by means of a Tree Preservation Order. A Tree Survey is included within the planning application. It is proposed to retain the line of mature trees along the southwest boundary of the site, within the Gleeson Homes Ivy Mill site.

3.15.3 The retention of mature trees is considered to be in accordance with policies **DM25** and **DM26**. For further information please see the supporting Tree Survey.

SECTION 4: SUMMARY AND CONCLUSIONS

- 4.1 Planning policy provides detailed criteria relating to the determination of planning applications for residential development, and this criterion is met in this application as follows:
- i. The proposed development achieves a high quality layout, ensuring good levels of natural surveillance on all public areas throughout the site;
 - ii. The scale, density, massing, construction, landscaping and materials to be used by the proposed development have all been designed to ensure that the scheme is entirely in keeping with the nature of surrounding development;
 - iii. As previously discussed, the proposed development is entirely acceptable in relation to its impact on the site, local amenity, environment and adjoining land uses;
 - iv. The layout of the development has ensured that future residents will benefit from appropriate levels of parking, access, pedestrian and vehicle circulation within the site;
 - v. The layout of the proposed development will ensure that all proposed dwellings will have acceptable standards of space, light, outlook and privacy, both in relation to the dwellings within the site and the existing properties adjacent to the site boundaries;
 - vi. A number of bus stops are located within reasonable walking distance of the site;
 - vii. The mix of dwellings in the development has been chosen having regard to the local housing needs identified in the Strategic Housing Market Assessment, and the market demand for the area.
- 4.2 The site lies within a residential area in close proximity to services and facilities including access to sustainable travel options including a number of bus services. It is also within walking distance of two of the four secondary Schools in the Borough.
- 4.3 The proposal achieves a density level of around 31 dwellings per developable hectare and is integrated well into the locality through the design proposals which accords with NPPF (2021).
- 4.4 All criteria required to be complied with in the Local Plan has been taken into account through the evolution of the scheme, resulting in a well-designed proposal that responds to the specifics of the site, both in terms of layout but also the design of the elevational treatment. It must also be noted that the proposals aim to deliver quality new homes to local people in addition to providing much needed new housing in this specific location.

- 4.5 On the basis of the above, it is considered that the proposal accords with national and local planning policy.
- 4.6 It is therefore considered that the proposal accords with all Planning guidance and relevant Policies, and as such planning permission should be granted as no other material considerations arise.

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