

Planning Statement – Land at Nethertown Road, St Bees

Proposal: Change of use of land for 5 holiday pods



Applicant: Sunshine Properties West Coast Ltd

March 2024

SRE Associates - Planning and Development Consultancy



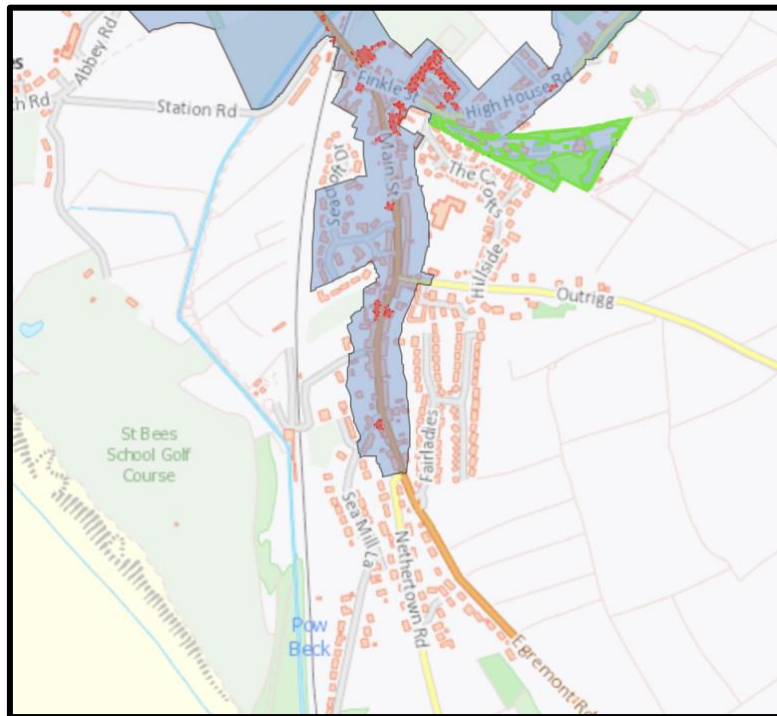
1.0 Introduction

- 1.1 This planning statement has been prepared on behalf of the applicant in support of a planning application for a holiday development on land at Nethertown Road, St Bees.
- 1.2 Section 2 of this Statement will set out the site's context, Section 3 covers the proposed development, Section 4 relates to the planning history of the site and surroundings, Section 5 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 6 will draw together the conclusions.

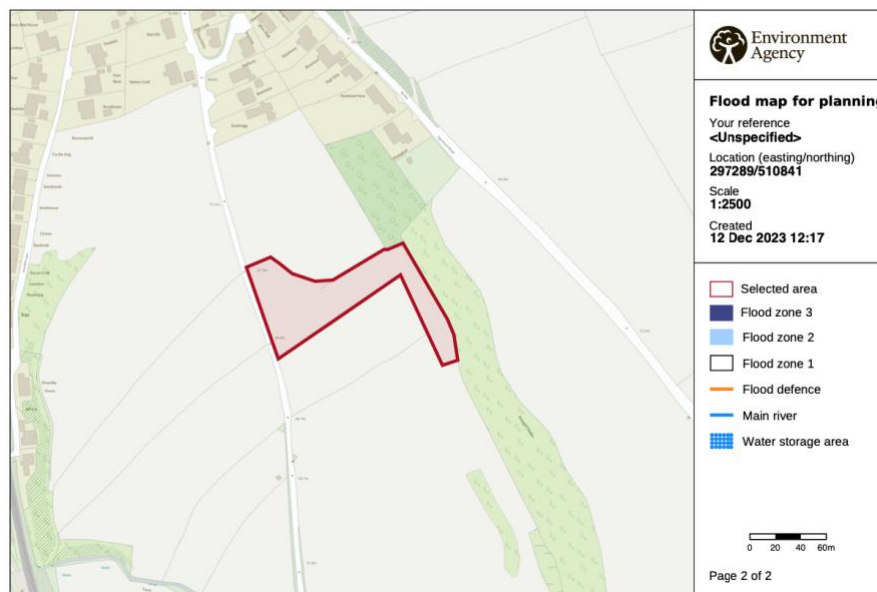
2.0 The Development Site

- 2.1 The site is currently mainly an area of agricultural land, for which the main area of the site measures approximately 125 metres wide by 25 metres, and it rises slightly across the site in a north-easterly direction. The site is bounded by stone walls and post and wire fencing to all the boundaries.
- 2.1 It is 0.62 ha in size and adjoins the approved development site of Planning application 4/20/2491/0 and 21/2368/001 to the north, Nethertown Road to the west, a small woodland area to the east and agricultural land to the south.
- 2.2 The site is mainly currently in use as agricultural land, with the exception of the access which is already in place for the adjacent residential development. The topography of the land is generally flat to nearer to the road frontage but raises significantly towards the east of this site and it is contained by stone walls to the east and west, and post and wire fences to the north and south.
- 2.3 The application site is part of land adjacent to the settlement boundary of the village on two sides, from the Copeland Borough Council Settlement Boundary as adopted in 2004 and retained by the Council in June 2015 as part of the Copeland Local Plan 2013 – 2028. It is within close distance of the main village centre, which benefits from the services of a shop/post office, Primary School, Secondary School, Train Station, Priory Church, 4 pubs, a playpark, beach front, swimming pool and golf course.
- 2.4 It is located close to the Whitehaven settlement boundary (2.0 miles away) and is therefore close to the local amenities of Whitehaven consisting of the West Cumberland Hospital, Senior Schools, supermarkets and shops. Whitehaven is the Main Service Centre in the Borough as detailed in the Copeland Local Plan. Whitehaven is accessible from St Bees via the train station.
- 2.4 The A595 which runs through Copeland can be joined 2.5miles from the site and provides easy access to both Sellafield and Whitehaven and continues north towards Carlisle, and Egremont and Sellafield to the south. The A595 links to the A66, 13 miles north of the site which connects to Penrith and Junction 40 of the M6 to the east.
- 2.5 In summary therefore, the site is situated within a long-established residential area that is within reach of the best range of facilities that the Borough can offer.

- 2.6 St Bees has a Conservation Area, for which the southern boundary is some distance along the Main Street to the north of the site, and there are no Tree Preservation Order's on or directly adjacent to the site.
- 2.7 There are no Listed Building's on the site. The nearest Listed Building is 81 Main Street, which is a domestic property located 0.4km to the north of the application site. This however is not impacted in any way by the site due to the distance between the two.



- 2.8 The site is located in an area that the Environment Agency Flood Map for Planning has noted as Flood Zone 1, and as such have a low probability of flooding.



3.0 The Proposed Development

- 3.1 The application consists of a change of use of land for the siting of five holiday pods on land at Nethertown Road, adjacent to the development of 5 residential dwellings.
- 3.2 The site is an extension of the existing development, which is currently served from a single point of access, which would be extended to access this site as indicated on the proposed plans.
- 3.3 The lodge style caravans will comprise of structures that fully comply with the Statutory Definition of a Caravan. The proposed pods for the site are externally finished in a timber cladding, and further information is included in the application.
- 3.4 The site will have a good level of amenity and privacy for each unit given the proposed layout and will not impact on the adjoining residential development.
- 3.5 On site, each unit will have one parking space, but to the rear of the site, and only a footpath walkway to the units to ensure as little of the site is hard surfaced as possible. A total of 8 parking spaces is proposed, with the additional 3 spaces given that not everyone will necessarily travel to the site together, may have visitors to where they are staying, or potentially deliveries or maintenance vehicles etc.
- 3.6 The layout complies with the density and spacings requirements for caravan sites whilst also seeking to utilise the existing space to provide a high-quality environment for the site occupants.
- 3.7 The layout has been carefully considered to form the most appropriate development in terms of amenity to both the other lodges within the proposed site, the approved residential properties and any views into the site from the surroundings.
- 3.8 The proposed site will have a new access directly from the road via the adjacent residential development. An access appraisal has previously been undertaken on the site frontage to ensure that suitable visibility can be achieved from a new access, which it can. In addition, an updated access appraisal has been undertaken which confirms that the traffic level on Nethertown Road is actually lower than the previous survey a couple of years ago.
- 3.9 An amenity area includes a grassed area, a trim trail and timber climbing frames and a hot tub to the north-eastern area of the site have now both been removed from the proposed development during recent amendments (March 2024) due to objections raised.
- 3.10 With regards to site management this is mainly covered in the provided Site Management Information document recently submitted as part of the application. The site is owned by, and will be operated and managed by the applicant, Mr Graeme Morgan of Sunshine Properties West Coast Ltd. The Site Management document covers that the development would need to comply with the Caravan site and control of Development Act 1960. The requirements of this are expanded upon in the document, and in addition, a Site Licence will need to be issued from Cumberland Council Environmental Health Department.

4.0 Planning history

- 4.1 Planning application 4/20/2491/0 - Outline application for residential development - Land to South of Southrigg, Nethertown Road, St Bees – Approved
- 4.2 Planning application 4/21/2368/001 - Outline application for a residential development with all matters reserved land at Nethertown road, St bees - Approved

5.0 Planning Policy and its application to the approved development

Copeland Local Plan

- 5.1 Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The Local Development Plan consists of policies within the Core Strategy and Development Management Policies DPD (December 2013). The policies in the following paragraphs are considered relevant to the proposed development.
- 5.3 The Local Plan 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 (2019) 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.
- 5.4 **Policy ST1** of the core strategy sets out the fundamental principles that will achieve sustainable development.
- 5.5 **Policy ST2** sets a spatial development strategy whereby development should be guided to the principal settlement and other centres and sustain rural services and facilities. However, the part of the policy that relates to the settlement boundaries is considered out of date until such time that the settlement boundaries are fully reviewed and adopted in a new Local Plan document.
- 5.6 Policy ER10 – Renaissance through Tourism

‘The Council will maximise the potential of tourism in the Borough and will seek to:

A Expand tourism outside the Lake District National Park boundaries, with a complementary offer that takes pressure off the National Park’s busiest locations, and delivers economic benefits in the Borough

B Locate new tourist accommodation, facilities and attractions where there is proven capacity for additional visitors to be accommodated without adverse environmental or amenity impacts, with consideration given to the following:

i) Focus major tourist accommodation and attractions in Whitehaven and develop the town as a base for exploring the wider area

ii) Encourage development of an appropriate scale in the Key Service Centres of Cleator Moor, Millom and Egremont which takes pressure off more sensitive areas

iii) Support development requiring a rural location within the smaller villages and countryside, if proven necessary to enhance the Borough's existing place-bound assets

iv) Permit holiday accommodation which meets the requirements of Policy DM9

C Support appropriate tourism development which accords with the principles of sustainable development and does not compromise the special qualities and character of allocated Tourism Opportunity Sites, the area surrounding them or public access thereto, in the following locations:

i) Hodbarrow

ii) Ehen/KeekleValleys

iii) Whitehaven Coastal Fringe

iv) Lowca Coastal Area

D Support appropriate developments which improve and enhance the quality of the tourism product

E Wherever possible tourism providers will be required to ensure that accommodation and attractions are well connected to other tourist destinations and amenities, particularly by public transport, walking and cycling

F The Council will work with the Lake District National Park Authority, Cumbria Tourism, West Cumbria Tourism Partnership and other tourism organisations in marketing, co-ordinating and managing the development of the Borough's offer and to maximise the benefits of the 'Lake District' brand

All tourism related developments should accord with Policies DM8 and DM9.'

- 5.8 With regards to the above, the proposed development aims to aid the Council's ambition to maximise the potential for tourism by bring forward this sustainable site. It aims to expand the tourism offer outside of the National Park boundary, in a location where there is a proven need for more or different tourism accommodation, at the start (or end) of the Coast-to-Coast walking route. It is development of an appropriate scale in a Local Service Centre in a sustainable location within the Borough.
- 5.9 Criterion E of the policy suitably describes the site as the accommodation is well connected to other tourist destinations and amenities by lots of walking routes and cycle routes including the Coast to coast walk. Also, in accordance with the above, the proposed development certainly improves and enhances the tourism offer in the area.
- 5.10 Policy DM10 is not considered relevant to the proposed development as it is not in a rural area, it is attached to a Key Service Centre.
- 5.11 Policy DM11 states that '*Proposals for new or improved visitor accommodation in the Borough will be supported subject to compliance with the principles of sustainable design*

outlined in ST1 and ER10 and so long as their scale and character are appropriate to the location and setting. '

- 5.11 The proposed development is undoubtedly sustainable development being in St Bees which is a Local Centre and adjoins a recently approved housing site. The site is located approximately 3 miles west of the A595 and is therefore located close to the strategic road network of West Cumbria. In addition, St Bees is served by a train station with regular services to Whitehaven, and further along the line north and south to Carlisle and Barrow respectively.
- 5.12 The proposed development will not increase traffic to the site by any significant amount, and the existing site has no issues regarding access or traffic as detailed in the attached access appraisal. It would certainly not give rise to an unacceptable impact on the local road network, and it is hoped that the option of sustainable travel to the site by train will be utilised by visitors, either by way of the Coast-to-Coast walk or cycle routes in the area. The existing site aims to retain as much of a rural feel as possible and keep hard surfacing to a minimum.
- 5.14 The proposed development site is well screened by the existing vegetation, boundary structures and topography, and the application is accompanied by a landscape statement. Finally, the aim of the proposal is to encourage all year-round tourism and increase the length and/or number of overnight visitors in accordance with the policies.

Emerging Copeland Local Plan

- 5.14 The Council is currently working on a new Local Plan, to replace the above Copeland Local Plan. This has yet to have a public consultation regarding the major modifications, and recent appeal decisions have given little weight to the settlement boundaries included within it. It does however contain two relevant tourism policies which are as follows:

- 5.15 Policy T1PU is regarding Tourism Development. This states:

'The Local Plan supports the creation, enhancement and expansion of tourist attractions, new build visitor accommodation and infrastructure in line with the settlement hierarchy.

All tourism development must be of an appropriate scale, located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets or the character of the area.

Proposals for tourism development outside of defined settlements will be supported where:

- *The proposal is for a specific activity or function that requires a location that cannot be accommodated for within the Principal Town, Key Service Centres or Local Service Centres; or*
- *The proposal enhances the borough's existing place bound assets; or*
- *The proposal is for the change of use, or diversification of an existing building, to provide overnight or longer stay visitor accommodation; or*
- *The proposal is for a farm diversification scheme in a rural area that will provide or*

enhance tourist provision.'

- 5.16 In accordance with the above, this development involves the creation of new build visitor accommodation to increase the overnight offering in the area, of an appropriate size to the settlement that it is located in.
- 5.17 Policy T2PU is regarding Coastal Development along the Developed Coast. This states:
- 'Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and scale will be supported where:*
- a) The proposal provides improved accessibility to the coastal walkways and cycle routes; or*
 - b) The proposal improves the quality and range of holiday accommodation including overnight tourist provision; or*
 - c) Gateways and/or hubs are enhanced or created; or*
 - d) Opportunities are provided to enhance the offer for both onshore and offshore visitors, at Whitehaven Harbour including provision for the docking of cruise ships;*
 - e) The proposal provides opportunities to enhance the tourism offer in south Copeland, or*
 - f) The proposal provides enhancement to the Lake District Coast*
- In all circumstances development should be of an appropriate scale located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets. All development should ensure local landscape character is maintained and avoid detrimental impacts on setting of Heritage Coast.'*
- 5.18 On the above policy, the site is 250m away from the coastline at St Bees. In addition, there is an existing footpath link down to the shoreline around 250m to the south of the site boundary. The proposal certainly improves the quality and range of holiday accommodation for overnight tourist provision in the area at the start of the Coast-to-coast walk, and this will hopefully enhance the use of the Coast-to-coast.
- 5.19 The most notable recent report regarding the economic impacts of the UK holiday park is a study entitled *"2019 Economic Benefit Report: Holiday Parks and Campsites England"*. The study was produced in February 2019 on behalf of the UK Caravan and Camping Alliance (UKCCA).
- 5.20 The Executive Summary of the report advises that:
- England's holiday park and campsite sector makes a substantial contribution to England's tourism economy, generating £6.81bn in visitor expenditure, equivalent to £3.88bn GVA and supporting 126,098 jobs;

- the English holiday park/caravan and campsite sector accounted for 5% of the tourism sectors GVA; and,
- Visitors to English holiday caravans and campsites stayed up to 73% longer and spent up to 59% more than the national tourism average.

5.21 The above demonstrates the importance of such tourism development on the economy to an area such as this.

5.22 There are no Supplementary Planning Documents that are relevant to the site or development proposals.

National Planning Policy Framework (NPPF) as amended July 2021

5.23 The National Planning Policy Framework was updated in July 2021 by the Ministry of Housing, Communities and Local Government. The overarching aim of the Framework is to proactively deliver sustainable development to support the Government's economic growth objectives.

5.24 The NPPF identifies three dimensions (economic, social and environmental) to sustainable development. It indicates that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

5.25 Paragraph 10 states that:

At the heart of the Framework is a presumption in favour of sustainable development.

5.26 For decision making it goes on to advise this means approving proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or,

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefit when assessed against the policies in this Framework taken as a whole.

5.27 Paragraph 11 of the Framework is unequivocal that authorities should approve:

...development proposals that accord with an up-to-date development plan without delay.

5.28 Paragraph 81 states

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

5.29 Paragraph 84 states

...planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside.

- 5.30 Therefore the above demonstrates that the proposed development meets the aims and objectives of the National Planning Policy Framework.

6.0 Conclusion

- 6.1 The proposed development has been carefully considered in relation to the existing site, the existing vegetation and topography, and the adjacent land uses. The development is considered appropriate in this respect.
- 6.2 The scheme is sited in a sustainable location.
- 6.3 The proposed scheme supports the aim of tourism development within the former Copeland Borough.
- 6.4 It is contended therefore that the proposed development is acceptable and is in accordance with both national and local planning policy, and therefore should be approved.

Simon Blacker MRTPI