



REPORT ON PROPOSED INQUIRY CHANGE

Subject: Managing the Housing Supply

Policy: HSG 3 and 4

Sections: 4.2 and 4.3

1. At the Housing Round Table Session there was a certain amount of criticism over the way in which the Plan deals with windfall development. In view of the comments made we undertook to look again at sections 4.2 and 4.3 and to make recommendations for changes to the policies and Reasoned Justification. A revised version of these sections is appended herewith.
2. Firstly we have incorporated the revised housing figure from the Proposed Modifications to JSP (Sept 2005) which is 190 dwellings pa giving a total of 2660 dwellings over the plan period ie an additional 80 dwellings overall. In Table HS2 the additional dwellings are assigned to years 2009/10 (25 dwellings) and 2013/14 (15 dwellings) and 2014/15 (10 dwellings) as being the most appropriate timing sequence. The remaining 30 dwellings are reserved to cover needs arising from rural exceptions over the whole of the plan period – paragraph 4.2.16 now includes an explanation of this and emphasises the point that each case has to be dealt with on merit: it is not possible in advance to specify how many will involve greenfield sites and how many will involve brownfield.
3. Table HS4 shows a revised balance of greenfield and brownfield targets with the 50 additional dwellings assigned to brownfield as additional windfalls. Indeed, revisions to paragraph 4.3.4 confirm that all windfall allowances are to be brownfield and to be slightly more than 40% of the housing supply originally envisaged. This is because of the number of sites likely to come forward as a result of regeneration masterplanning exercises in the main towns and the use of Opportunity Development Sites-designations in the Plan.
4. Tables HS6, HS7 and HS8 incorporate revisions. The omission of Cleator Mills from Tables HS6 and HS7 was proposed in the Pre-

Inquiry Changes (PC010) but is incorporated here giving new totals for the allocated sites. These are also incorporated into a revised Table HS8 along with the additional 80 dwellings arising from the Proposed JSP Modifications referred to above.

5. A revised Policy HSG 3 is recommended to clarify use of both Table HS7 and HS8 in the management of supply over time and over geographic (market) areas. The mechanism for dealing with slippages etc is still as per the 2nd Deposit Plan in paragraph 4.3.4 with priority given to brownfield candidates where an alternative might have to be found for an allocated site.
6. The delivery of windfalls would be through Policy HSG 4 which together with paragraph 4.3.5 has been fully revised to omit any reference to non-brownfield development arising. The rate and geographic distribution of this allowance would be managed alongside the supply of allocated sites in accordance with Table HS8.

4.2 HOUSING REQUIREMENTS

Proposed Inquiry Changes shown in blue type with additions underlined and words/figures to be removed shown double strikethrough.

- 4.2.1 Policy UR7 of RPG requires an annual rate of housing provision in the North West of 12,790 dwellings. This figure is based on government population projections, assumptions about economic growth and assessments of housing needs and opportunities around the region. The total is broken down into sub-regional allocations with 1,170 dwellings apportioned to Cumbria and the Lake District which RPG envisages as an annual build-rate from April 2002 onwards.
- 4.2.2 The JSP's function is to break this figure down into appropriate targets for the Districts but the ~~Deposit Version~~ Proposed Changes Modified version of JSP (~~May 2003~~ June 2004 September 2005) argues that to deliver the RPG requirement a 10% overprovision is needed because there is always slippage in implementing planning permissions. Policy H14 ~~H14~~ H17 of the JSP is therefore based on an annual rate of 1,300 dwellings for the County overall ~~and the apportionment of annual targets for each district which also take into account the number of planning permissions already in the system at the end of March 2002~~ for Copeland the annual consent "target" is therefore ~~170 dwellings for the period 2002-06 and 190 dwellings a year thereafter~~ i.e. a total of ~~2580~~ 2660 dwellings over the plan period. ~~and a target for Copeland of 190 dwellings a year – which equates to 2,660 dwellings over the Local Plan period 2002–2016.~~
- 4.2.3 More significantly the JSP argues that an annual build-rate is difficult for local planning authorities to deliver. They can only control the rate at which new planning permissions are granted not when the dwellings are constructed. Accordingly the JSP expects provision for new housing at the Copeland level to be an average of ~~170 or~~ 190 units per year in addition to the "stock" of planning permissions as at 31 March 2002 which was 926 dwellings. The extension of the case favouring this approach is that it affords a) a wider choice of housing in relatively weak markets locally and b) provision for a corresponding "stock" total of consents at the latter end of the plan period to ensure later adequacy of supply.
- 4.2.4 The provision of 190 dwellings per year in Copeland is not far off the trend figure for completions in the Borough over the last five years:

Table HS1 : Annual Housing Completions 1998 - 2003

Year	Dwelling Numbers		
	Sites over 5 dwellings	Sites under 5 dwellings	Total
April 1998 – March 1999	124	66	190
April 1999 – March 2000	150	35	185
April 2000 – March 2001	130	52	182
April 2001 – March 2002	138	34	172
April 2002 – March 2003	120	64	184

4.2.5

It has to be stressed, however, that these years reflect a failing economy when there were significant job losses and population decline. With a need to attract inward investment quickly and bring impetus to regeneration the Council feels that a much higher rate of house-building has to be encouraged over the next few years. This has to accommodate a variety of house-types concentrated on a range of attractive sites which can begin to rebalance local housing markets that have for many years been dominated by older, smaller, cheaper properties. Such housing characterises large areas of Copeland's towns and villages, particularly involving 19th century terraced properties and mid 20th century public sector estates, where low demand is now becoming a worrying feature. By January 2005 this has become significant enough for the government to announce that funding will be made available for new housing renewal initiatives post 2006. The proposal to accelerate the rate of house-building in the early part of the plan period will therefore be offset by the increasing importance of demolitions, replacements and refurbishments post-2009 which will have the effect of slowing down the net increase in housing stock. The Council is not proposing an increase in the overall target for new planning permissions between 2002 and 2016, merely a rate readjustment to provide flexibility when it is needed. The revised figures are set out in Table HS2 with the "allowances" for 2002-03 and 2003-04 reflecting the actual number of consents granted. They illustrate just how quickly the local housing markets had begun to heat up and the Council had to institute a working policy to restrict new consents from June 2004 as a result (see section 4.3 below).

Table HS2: Scale of Housing Provision Annually

Year	2002/3	2003/4	2004/5	2005/6		Total
Dwelling Nos	400	400	200	200		1200

Year	2006/07	2007/08	2008/09	2009/10	2010/11	Total
Dwelling Nos	300	300	150	400 125	100	950 975
Year	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Dwelling Nos	100	100	90 95	75 85	75	430 455
Allowance for Special Needs Housing (see 4.2.16)						30
OVERALL TOTAL						25802660

4.2.6 It also The figures quite easily accommodates the number of dwellings required to meet the objective of stabilising the Borough's population over the plan period. On current projections this could be achieved through the provision of only 110 dwellings a year (see Table HS2 3 – 1,653 dwellings over the 15 year period 2001 – 2016).

Table HS2 3 : Zero Net Migration Population Projection

	2001	2006	2011	2016
Dwellings	31,111	31,491	32,098	32,764
Households	29,291	29,648	30,220	30,847
Total Population	69,000*	68,971	68,874	68,838

*mid year estimate

4.2.7 As we have seen in the past though, such projections can only be a guide and at another extreme the recent Housing Needs Survey undertaken for the Council by the Northern Housing Consortium suggests that there is a demand for up to 1,547 dwellings over the next five years. (there are a number of factors involved in this assessment, however, which are discussed later in para 34.6.4).

4.2.8 The annual requirement is regarded as an average to be achieved over 4 – 5 year blocks. Annual monitoring and review by the Council will be essential to ensure that a good supply of housing land is available at the end of each block of time (See section 34.3 Plan, Monitor and Manage). It should be noted that the ~~490~~ dwelling target is net of any replacement building following housing clearance. ~~and also excludes housing which is to meet local needs under policies HSG 11 and 12.~~

4.2.9 The choice of where land should be made available for house building is governed by the Local Plan Development Strategy. This highlights the need to concentrate most new building within the Key Service Centres, and at a smaller scale in the Local Centres. A sequential approach also applies which prioritises the use of existing buildings and previously developed land

(brownfield sites) over previously undeveloped land or (greenfield sites) (Policies DEV 2 – 4).

4.2.10

The recycling of land and buildings is an essential component of PPG 3. The government has set an overall national target that 60% of all new housing should be accommodated on brownfield sites. However, given the generally rural character of Cumbria, RPG allows for a more modest target of 50% for the County which is to be applied to all new dwellings constructed from April 2002 (Policy UR4). However, the revised modified JSP (June 2004) envisages differentials between Cumbrian districts to achieve the County target (Policy H18). Thus brownfield targets for rural parts of Allerdale and Carlisle are set at 40% of new housing contrasting with the 70% expected of Copeland and that portion of Allerdale defined as being within West Cumbria. Even the City of Carlisle is less – a brownfield target of 65% is set here. The JSP authorities maintain that the differential is based on the ready availability of previously used land identified in the District Authorities' 1998/2000 urban capacity studies (see Appendix 3). The Council disputes the validity of comparison between the studies citing the difference between the targets for Copeland (a mixture of small towns and villages) and Carlisle (a city) as especially unexpected.

4.2.11

The Council's opinion is that brownfield targets moving progressively from around 60% at the start of the plan period through 65% at midway and 70% by the end are more realistic, particularly from a standing start (see Table HS4 and section 4.3 below). These figures will also allow the local housing markets to develop wider site choices including a selection of more attractive urban fringe and large-village greenfield options. The greenfield supply needs to be maintained particularly in the early part of the plan period to encourage inward investment and also to help achieve balance in the housing markets overall. It should be noted that the number of new dwellings arising from the post 2009 housing renewal programmes will all be brownfield and will to a degree offset the earlier releases for greenfield development (their impact may be lessened somewhat because monitoring figures will tend to show net additions to the housing stock after having accounted for demolitions). This target automatically includes all unexpired planning permissions at March 2002 (– non of which were required to meet such a target when granted). The imbalance between these planning approvals in terms of greenfield : brownfield was about 70 : 30. The designations for new housing in the Local Plan must redress this imbalance by favouring more brownfield options. (JSP Policy H 15).

Table HS4 : Targets for Recycling of Land and Buildings

	<u>2002/2006</u>		<u>2006/2011</u>		<u>2011/2016</u>		<u>Total</u>
	<u>Dwelling Nos</u>	<u>%</u>	<u>Dwelling Nos</u>	<u>%</u>	<u>Dwelling Nos</u>	<u>%</u>	
<u>Greenfield</u>	<u>520</u>	<u>43</u>	<u>355</u>	37 <u>36</u>	<u>140</u>	33 <u>31</u>	<u>1015</u>
<u>Brownfield</u>	<u>680</u>	<u>57</u>	595 <u>620</u>	63 <u>64</u>	290 <u>315</u>	67 <u>69</u>	1565 <u>1615</u>
<u>TOTALS</u>	<u>1200</u>		<u>950</u> 975		<u>430</u> 455		<u>2580</u> <u>2630</u>

4.2.12

In addressing the recycling target the Council is expected to:

- Review all existing unimplemented planning permissions (Table HS45) as they expire and to refuse to grant further extensions for those which do not accord with the Development Strategy.
- Review unimplemented allocations from the previous Local Plan and exclude those which do not accord with the Development Strategy.
- Consider the allocation of appropriate brownfield sites which accord with Development Strategy requirements and which for the most part are drawn from studies carried out to establish urban potential and for the National Land Use Database (see Appendix 3).
- Make an allowance for windfall sites i.e. brownfield sites which may not be available at the present time but which may come forward during the plan period – especially those in town centres which offer opportunities as part of mixed development.
- Consider the allocation of an appropriate balance of greenfield sites in sustainable locations which accord with Development Strategy requirements.
- Introduce a process of “plan, monitor and manage” in handling the release of housing land (see 3.4.3 below) whereby decisions on the granting planning permission and phasing of development involve preference being given to existing buildings and the re-use of previously developed land.
- Ensure that development incorporates higher densities than previously achieved to maximise the potential of previously developed land and minimise the take up of greenfield sites.

- Consider the use of measures such as land reclamation and compulsory purchase to bring forward previously developed land for development.

4.2.13 The actual figures involved in achieving the recycling target are set out in para ~~3~~4.2.15.

4.2.14 Table HS~~3~~5 includes all sites with planning permission as at ~~30 September~~ 1st October 200~~3~~4. All those involving 5 or more dwellings are specified with the number of dwellings outstanding. They are also shown on the Proposals Map Insets. Sites of less than 5 dwellings are amalgamated to settlement totals. These permissions are legally valid and cannot be the subject of a Local Plan objection. However, some planning permissions for various reasons, can expire without being implemented. In such cases, in line with RPG Policy UR 5, the Council will not consider renewing the permission unless the nature of the site, its location, the density of development and other design issues accord with the requirements of the Development Strategy (see ~~section 2.8~~ Chapter 3) and, therefore, with national regional and JSP guidance. Decisions on each site will also be informed by the availability of sustainable development land options current at the time applications are submitted in accordance with Policy HSG 3 (see section 4.3).

POLICY HSG 1 : Existing Planning Permissions

Land designated for housing purposes includes sites in Table HS~~3~~5 which have planning permission for 1147 dwellings. Planning permission will only be renewed for sites and forms of development which accord with the Local Plan Development Strategy and ~~the requirements of Policies DEV 6 and HSG 8~~ other local plan policies.

Table HS35 : Planning Approvals at 1st October 20034

Settlement	Site Ref	Location	Numbers outstanding		Total
			Greenfield	Brownfield	
Key Service Centre					
WHITEHAVEN	H1	Aikbank	3		
	H2	Stanley View	4		
	H3	Church Hill	14		
	H4	The Groves	3		
	H5	Garlieston Court		11	
	H6	North Row, Kells	10		
	H7	The Hollins		24	
	H8	Central Row, Kells		5	
	H9	Low Road		80	
	H10	Coach Road		20	
	H11	Strand Street		10	
	<u>H42</u>	<u>83 Lowther St</u>		<u>8</u>	
	<u>H43</u>	<u>Laundry, Low Rd</u>		<u>28</u>	
		Under 5's	<u>49</u>	<u>2431</u>	<u>2840</u>
		Whitehaven Total	<u>3529</u>	<u>174212</u>	<u>209241</u>
CLEATOR MOOR	H12	Pillar View		12	
	H13	Little Croft, Leconfield Street		6	
	H14	Trumpet Road		2	
	H15	Towerson Street		7	
			Under 5's	<u>98</u>	<u>1013</u>
		Cleator Moor Total	<u>98</u>	<u>3733</u>	<u>4641</u>
EGREMONT	H16	Gillfoot	65		
	H17	Old Castle Cinema		6	
	<u>H44</u>	<u>Townhead</u>	<u>14</u>		
	<u>H45</u>	<u>Windrigg Close</u>		<u>64</u>	
			Under 5's	<u>46</u>	<u>1013</u>
		Egremont Total	<u>6985</u>	<u>1683</u>	<u>85168</u>
MILLOM	H18	Pannat Hill	4		
	H19	Mainsgate Road	9		
	H20	Calderfield		4	
	H21	Station Yard East		24	
	H22	Station Yard West		<u>108</u>	
	H23	Moor Farm	<u>41</u>		
	<u>H46</u>	<u>West County Hotel</u>		<u>12</u>	
			Under 5's	<u>35</u>	<u>811</u>
		Millom Total	<u>2010</u>	<u>4659</u>	<u>6669</u>
LOCAL CENTRES					
BIGRIGG	H24	Rear Old Captains House	7		
	H25	Land off Chapel Street	33		
	<u>H47</u>	<u>Former School</u>		<u>9</u>	
DISTINGTON	H26	Hinnings Farm	85		

FRIZINGTON	H27	Rheda Close	4	6	
	H28	Dower House			
	H29	Rheda Park	8		
	H30	Lingley Fields	54		
	H48	Kangol		39	
HAVERIGG	H31	Richmond Gardens	42		
	H49	Poolside		80	
LOWCA/ PARTON	H32	Ghyll Bank		11	
	H33	Croft Head Farm	18		
MOOR ROW	H34	Montreal Place	4		
	H35	Larch Court	22		
MORESBY PARKS	H36	Eden Drive	5229		
	H50	Railway Cottages	14		
SEASCALE	H37	Scawfell Hotel		10	
ST BEES	H38	Fairladies	4436		
	H39	Seacote	37		
	H40	Abbots Court	2		
THE GREEN	H41	Black Beck	3		
All Local Centres		Under 5's	3948	2033	5981
		Total Local Centres	330273	47108	377381
OTHERS		Over 5's	3948	7	4655
		Under 5's	5385	1827	71112
		Total Other	93133	2534	118167
		TOTAL	556538	345609	9011147

4.2.15

Some of the dwellings in Table HS5 are the result of unexpired planning approvals granted before 1st April 2002, the base date of the plan. Approvals for 867 dwellings were actually granted after 1st April 2002 and it is only these which count against the JSP's revised target of ~~2580~~ 2660 dwellings for the plan period to 2016. The plan must therefore make provision for an additional ~~1713~~ 1793 dwellings (~~2580~~ 2660 - 867) as a net figure i.e. permissions arising from clearance/redevelopment schemes will not count towards this figure. Higher proportions of brownfield sites will be required to offset the relatively poorer performance on recycling between 2002 and 2004 when of the 867 dwellings approved 395 dwellings or 45% involved greenfield sites and 472 dwellings (55%) were brownfield. The full breakdown of recycling requirements are set out in section 4.3. The sites and dwellings totals in Table HS3 include a significant number of planning permissions valid at 31 March 2002 – the base date for this Local Plan. However, additional sites have been approved for housing development during the 18 months since and these have to be accounted for in terms of the annual 190 dwellings allowed for by the JSP.

3.2.15 The starting point for making allocations for the 190 dwelling target is to assess the requirement for a greenfield : brownfield split which will redress the recycling imbalance of sites approved before April 2002:

At 31 March 2002 there were a total of 926 dwellings approved made up of 631 greenfield and 295 brownfield. These figures need to be reduced by 10% to be consistent in terms of the JSP approach to slippage. (see 3.2.2) This gives the following totals:

~~Greenfield : 568~~

~~Brownfield : 265~~

~~**Total 833**~~

The JSP requirement for 2002 – 2016 is:

190 x 14 (years) = 2,660 dwellings

Planning permissions at 31.3.02 = 833

Overall total is thus = 3,493

The target balance for recycling is a 50% split between greenfield 1,746 and brownfield 1,746

Taking into account the balance between greenfield and brownfield in the planning permissions at 31.3.02 this becomes

greenfield 1,746 – 568 = 1,178

brownfield 1,746 – 265 = 1,481

3.2.16 Consequently we should be looking to make provision for 1,178 dwellings on greenfield sites and 1,481 on brownfield sites which is about 45 : 55 rather than the 30 : 70 estimated in the JSP (Policy H15).

3.2.17 However, and as noted above, we need to take account of the effect of planning permissions granted since 1 April 2002 and these total 178 (57%) on greenfield sites and 134 (43%) on brownfield sites. The revised housing requirement at 30 September 2003 is therefore **1,000** greenfield and **1,347** brownfield.

4.2.16 The Council does not intend to make site specific allocations of land for all these dwellings. It is aware of the contribution that “windfall” sites can make to housing numbers. These are sites or building conversions which are not necessarily available for housing at the present time but which may come forward during

the plan period. (The urban potential studies/NLUD work has indicated a sizeable array of possibilities and some of these are put forward in the plan as Opportunity Development Sites where housing could be one or part of a mix of uses). In the past such “windfalls” have made up about a third of all housing development and ~~but~~ an allowance of slightly more, 40% ~~for this proportion will apply again~~ is considered appropriate in view of the number of Opportunity Development Sites and other redevelopment options identified in recent economic masterplanning exercises in the Key Service Centres. Since ~~nearly~~ all such development is derived from brownfield sites the requirement for site specific brownfield land can be reduced accordingly. ~~Some degree of caution will be applied in monitoring performance, however, since the windfall allowance does have to accommodate all local needs exceptions approved via Policies HSG 5 & 11 be they green or brownfield.~~ In addition there is a 30 dwellings allowance to cover dwellings arising from implementation of Policies HSG5 and HSG11 – the exceptions for social and economic needs in rural areas. At this stage it is not known what proportion will arise as greenfield or as brownfield but each case will need to comply with the sequential test set out in Policy DEV4. They have not been designated as greenfield or brownfield in Table HS4 and are excluded from the breakdown in paragraph 4.2.17.

4.2.17 The allocations for new housing land ~~September 2003~~ 1st October 2004 – 2016 are therefore:

Greenfield sites:	1,000	620 <u>620</u> dwellings	36.2% <u>35%</u>
Brownfield sites:	565	376 <u>346</u> dwellings)	
Windfall allowance:	782	717 <u>797</u> dwellings)	63.8% <u>64%</u>

TOTAL ~~2,347~~ 1713 1763 dwellings

4.2.18 Table HS46 shows sites identified by the Council which it feels are suitable for housing development based on the principles of sustainable development and regeneration needs incorporated into the Local Plan Development Strategy. As broad a range of sites has been included to help deliver wider housing opportunities and choice.

4.2.19 The assessment process was applied to all previous local plan housing land allocations which remained to be taken up, all employment land allocations still to be taken up; sites identified in the urban potential studies and sites suggested by owners and potential developers. The allocations have also been revised in the light of objections made to the 1st Deposit of the local plan. The emphasis ~~was~~ is on sites within or on the urban fringe of the Key Service Centres with additional candidates

drawn from the Local Centres to help balance local housing markets in the short and medium terms.

4.2.20

The assessments included the sequential tests as regards recycling and flooding and the various other tests of sustainability including accessibility, “nodal” locations, environmental impact, avoiding high quality agricultural land and taking account of infrastructure capacity. The density figures applied reflect the requirements of PPG 3 but the Council feels that a minimum figure of 30 dwellings per hectare is more appropriate to urban areas of Copeland rather than the 50+ dwellings advocated by government which are perhaps more suited to metropolitan parts of the region. After all, development in Copeland in recent years has typically been running at 17 – 20 per hectare ~~25 per hectare is seen as more appropriate for the Local Centres.~~ For some rural or semi-rural situations a lower density figure is included in Table HS46 since it would not be appropriate to import urban character to such locations. Sites in this category are justified in terms of widening housing choice and in particular to help redress an acknowledged shortfall of higher priced housing which is regarded as a deterrent to potential business formation or expansion.

4.2.21

In addition some sites such as ~~the group on Woodhouse Road/St Bees Road in Whitehaven,~~ the sites adjoining Mill Hill at Cleator Moor, and the Egremont North sites are combinations of green and brownfield land. Such combinations can provide a useful “bridge” for developers who will increasingly have to unlock the more difficult, often more costly brownfield options. It goes without saying, however, that the brownfield element of the combined site must form part of any planning submission and there will be a requirement, if necessary through a planning obligation for the brownfield element to be developed within an approved phasing programme. The Council is aware of a need for land to accommodate self-build groups and may consider making some of its own land holdings available for this purpose. The sites at Red Lonning and the former Kells School could be suitable candidates.

4.2.22

Most of the sites will require treatment through a Development Brief which will specify the detailed design and/or phasing issues which need to be addressed in each case (ref ~~2.11.3~~ 3.4.5). Such requirements will follow on from the Development Strategy and implementation of Local Plan policies. There may also be some special site considerations to assist the physical, social or economic assimilation of the development. This will include attention to for example undermining and drainage difficulties. The Environment Agency has advised that most sites in Table HS4 will require a flood risk assessment before outline approval is granted. All such

assessments and Development Briefs must be approved by the Council before detailed applications for planning permission are drawn up. These documents Usually they will also be prepared by the Council and the Development Briefs will also form part of the ~~Local Plan's~~ Council's Local Development Scheme as Supplementary Planning Guidance Documents until the subject development is completed.

POLICY HSG 2 : New Housing Allocations

Land is designated for housing purposes in Table HS4 which can accommodate up to ~~1577~~ 996 dwellings on a mixture of new and previously used sites. Planning permission for their development will only be granted where the proposed scheme incorporates the requirements of Policies DEV 67 and HSG 8.

Table HS46 : Sites Allocated for New Housing Development (Policy HSG2)

Key Service Centres	Site Ref	Area in ha	Density Dwellings Per ha	Dwelling Numbers		Comments
				Greenfield	Brownfield	
WHITEHAVEN						
Highlands extension	HA1	8.2 <u>6.6</u>	30	250 <u>200</u>		Land forming part of the "Harras Moor" housing allocation originally included in the 1978 Whitehaven Local Plan except for 0.8ha previously designated for industry. A brief has already been approved for site development with a more recent addition of a phasing plan reflecting this allocation <u>which will require amending to 1) reflect the revised allocation, 2) incorporate the phasing as proposed in Table HS7 and 3) exclude the requirement to make a connection between the estate Distributor Road</u>

						<p><u>and Caldbeck Road as part of the development programme during the plan period. (However, the Distributor Road must be required to be built up to the site boundary to avoid any future ransom strip putting further development at risk.)</u> Development will require completion of the Distributor Road. A Flood Risk Assessment and wildlife survey will also be required</p>
Red Lonning	HA2	2.2	30	66		A previously allocated site. Flood risk and wildlife assessment may be required.
Woodhouse Road	HA3	4.2	30	125		<p>Site development probably in association with the adjoining site where planning permission for housing already exists. New Development here and the nearby brownfield options will assist overall housing renewal plans for the Greenbank/Woodhouse area although building may only be sanctioned once a new Pow Beck spine road has been constructed. Flood risk assessment required in relation to Pow Beck implications and care necessary in relation to an important wildlife site adjoining (Woodhouse</p>

						quarry).
Galemire/ Summergrove	HA4	3.75 <u>2.0</u>	10 <u>20</u>	40 <u>35</u>		Low density development on the urban fringe near Westlakes Science and Technology Park and adjoining similar forms of housing sanctioned in the previous Local Plan. Additional footway provision <u>traffic calming, lighting</u> and access improvements may <u>will</u> be required together with care over surface water disposal. Timing will be dependent on capacity of Cleator Waste Water Treatment Works (WWTw) <u>The Development Brief will also require high standards of design and finishes to secure a quality development.</u>
Kells School site	HA5	2.6	30		77	Remainder of former school site. May require offsite

						junction visibility improvements
Laundry site, Low Road	HA6	1.3	30		43	Two sites which could be developed in tandem or with nearby housing land with planning permission or designated in the Local Plan. This could improve access safety.
Builders Yard, Low Road (old brick works)	HA7	2.0	30		60	Future public access to the old "brake" line connecting the area to the coastal fringe must be safeguarded. Site levels could reduce housing numbers. Also similar comments to Woodhouse Road site re floodrisk, Pow Beck Spine Road and Quarry wildlife interest
CLEATOR MOOR						
Birks Road	HA8	1.6	30	48		Previously designated housing site. May require new access and Flood Risk Assessment.
Adj Mill Hill #1	HA9	3.85	30	115		Accessed off <u>the</u> existing estate road system. The greenfield section

Adj Mill Hill #2	HA10	2.19	30		66	<p>provides access to the brownfield area. Latter requires reclamation work which must be completed before overall development is sanctioned. <u>Also before building work begins: 1. A full study of contamination will be required as part of this work together with a schedule of comprehensive treatment to make safe. The treatment programme to be completed to the satisfaction of the Council and Environment Agency. 2. A nature conservation study of the sites will be required with protection/enhancement measures incorporated into a full landscaping scheme. 3. An investigation of land stability and appropriate precautions incorporated. The design must also incorporate provision for cyclepath connections.</u> Flood Risk Assessment required and timing subject to WWTw capacity.</p>
EGREMONT						
Gulley Flatts	HA11	0.73	30	22		<p>Completion of previously designated housing development. Does not require a Development Brief.</p>

North (adj A5086) #1	HA12	3.3	30	100		Parts of a previously allocated site for industrial/commercial development which was not taken up. Housing development must take place in tandem – this requires prior reclamation of the brownfield section, a former pit head. A Flood Risk Assessment is required and a cycleway link. <u>A nature conservation study is also required with protection/enhancement measures incorporated into a full landscaping scheme. The phased programme of development (Table HS7) is also required to reduce initial impact on A595.</u>
North (adj A5086) #2	HA13	1.1	30		35	
Gillfoot Mansion	HA14	3.8	10	20		Low density urban fringe development. May require Flood Risk Assessment and improved access arrangements. Not all site available for building <u>because tree retention will be a major feature of the development and nature conservation measures will be required in accordance with the results of prior survey work. The un-culverting of Skirting Beck also required.</u>
Windrigg Close Extension	HA15	0.85	30		25	Two adjoining sites where development

Former Rowntree and Dairy Site	HA16	1.5	30		45	should be coordinated with joint access arrangements. Flood Risk Assessment will be required. Cycleway provision is required through the site.
MILLOM						
Salthouse Road	HA17	4.5	30	120		A previously designated housing site. There is potential flood risk associated with Salthouse Pool which reduces density yield.
<u>Devonshire Rd</u>	<u>HA30</u>	<u>2.0</u>	<u>30</u>		<u>60</u>	<u>2 phases. Brief to require landscaping scheme including retention of existing planting and nature conservation safeguards.</u>
<u>Adj Lowther Road Estate</u>	<u>HA31</u>	<u>1.0</u>	<u>30</u>	<u>30</u>		<u>2 phases. Brief to require improved surfacing and lighting for existing footpath.</u>
Key Service Centres Total				566	237	
LOCAL CENTRES						
ARLECDON/ ROWRAH						
Arlecdon Road	HA18	1.2	25	30		Current planning application pending. Existing terraced properties on Arlecdon Road to be provided with rear access road and space for relocated garages.

Rowrah Goods Yard	HA19	1.3	20		25	Junction and access improvements required <u>together with provision of a cyclepath users' car park</u> – will reduce density.
BECKERMET						
Croftthouse Farm	HA20	<u>0.7</u>	<u>20</u>	<u>14</u>		Likely to require additional footway provision
CLEATOR						
Cleator Mills	HA32	1.0	30		30	Mixed site incorporating residential and employment uses. Exact locations dependent on viability of design. Brief to incorporate safeguards re potential affect on amenity (buffer strip planting etc). flood risk assessment and timing may be affected by WWTw capacity.
ENNERDALE BRIDGE/ KIRKLAND/LA MPLUGH						
Vicarage Lane extension	HA21	1.1	10	10		Limited, low density extension to fit in with existing development
Kirkland West	HA22	1.5	20		20	Likely to require additional footway provision
Former Murton Pit	HA23	0.6	<u>20</u>		<u>12</u>	Previous approval for tourism development not implemented
FRIZINGTON						
Kangol Site	HA24	1.4	25		35	Redevelopment of former factory site. May require flood risk assessment and attention to adjoining garage site access.

Lingla Bank	HA25	1.3	<u>30</u>		<u>39</u>	Previous designation still to be taken up. Requires highway upgrading work
HAVERIGG						
Concrete Square	HA26	2.7	30		80	In part, previously designated for housing. A Flood Risk Assessment required with highway upgrade works. Number may be affected by WWTw Capacity and underground services.
PARTON/LOWCA						
Whites Row	HA27	0.4	<u>30</u>		<u>12</u>	Previous designated redevelopment site. Does not require Development Brief.
SEASCALE						
Fairways extension	HA28	1.01	<u>30</u>	<u>30</u>		Extension of existing forms of development Flood Risk Assessment required.
THE GREEN						
Adj Mill Park	HA29	2.0	10	20		Low density development to match adjoining housing. Flood Risk Assessment and highway upgrading works required. Waste water treatment solution required
LOCAL CENTRE TOTALS						
				<u>84</u>	139 <u>109</u>	
OVERALL TOTALS						
				<u>620</u>	376 <u>346</u>	

Table HS7 : Phasing of Allocated Sites

Site	Site Ref	Dwelling Numbers			Total	
		2002 – 06	2006 – 11	2011 - 16	G	B
Highlands	HA1	60	100	40	200	
Red Lonning	HA2	30	36		66	
Galemire	HA4	15	20		35	
Kells School	HA5		50	27		77
Mill Hill	HA9/10		90	90	115	65
Egremont North	HA12/13		70	65	100	35
Gillfoot	HA14		20		20	
Devonshire Road	HA30		30	30		60
Lowther Road	HA31	10	20		30	
Rowrah Goods Yard	HA19		26			26
Croftouse Farm	HA20		14		14	
Cleator Mills	HA32		30			30
Vicarage Lane	HA21	10			10	
Kirkland West	HA22		20			20
Murton Pit	HA23		12			12
Lingla Bank	HA25		19	20		39
Whites Row	HA27		12			12
Fairways Extn	HA28		20	10	30	
TOTALS		125	589 559	282	620	376 346
Recycling Balance		G B	G B	G B	Combined Total	
		125 0	355 234 204	140 142	996 966	

4.3 PLAN, MONITOR AND MANAGE

4.3.1 PPG 3 puts a greater emphasis on the management of house – building over time to ensure that development plan requirements, particularly on recycling targets are met. To ensure that real progress is being made the Council will continually monitor the number and type of consents granted and construction rates. (Quarterly reports will be made to the Council’s Planning Panel and returns to GONW are to be submitted annually as part of the new Local Development Scheme arrangements). However, an exact annual balance of 190 dwellings approved on 55% brownfield sites is not

expected.— The RPG/JSP guidance on this process looks to three, blocks 2002 – 2006, 2006 – 2011 and 2011 – 2016 where over each block local planning authorities should try to achieve a balance of approvals and recycling.

4.3.2 As previously noted it would be very difficult for the local construction industry to immediately redress the recycling balance in the first few years. A The more measured approach will to be adopted with an overall target of 60% brownfield over greenfield in the period 2002—2006 reducing to 57% over 2006 –2011 allowing for the required 50% to be achieved by 2011. is set out in Table HS4 just after para 4.2.11.

Table HS5 : Proposed Management of Recycling Target

	2002— 2006	2006— 2011	2011— 2016	Overall balance
Recycle target	60%	57%	50%	
Dwelling) green	246	410	475	1,189
Nos) brown	304	540	475	1,471
Total	760	950	950	2,660

4.3.3 We are currently ~~18 months~~ now over 2 years into the first time block of 2002-2006 during which time there has been a heating up in the local housing markets. and if the average was applied we might expect planning permissions to have been granted for ~~285 dwellings~~ and with a 60% recycling target this would suggest ~~171 brownfield and 114 greenfield.~~ The actual figures over this period are a total of ~~312 dwellings~~ with ~~134 brownfield and 178 greenfield~~ so some re-balancing will be necessary during the next couple of years. Between 1st April 2002 and 30th September 2004 a total of 867 dwellings were granted consent and given the requirements of RPG 13 the Council felt it was necessary to introduce an Interim Housing Policy to slow down the release of sites until this replacement Local Plan is adopted. The Interim Policy has operated since June 2004 allowing only brownfield development, local needs and very limited, settlement-based greenfield options.

4.3.4 At some stage in each of the time blocks it may become necessary to refuse planning permission for development which would create excessive proportions of greenfield sites when judged against the recycling target. Exception to this rule would only apply if it could be demonstrated that no alternative brownfield site was available in the general locality (North, Mid and South Copeland would be appropriate measures of general locality). Table HS8 shows how it is intended to manage the

release of land for building over the remainder of the plan period, grouping housing markets in North, Mid and South Copeland. Overall totals for each of the three areas are proportional to their population sizes with the phased release of allocated sites in accordance with Table HS7. ~~and~~ In addition an allowances for windfalls ~~spread through the time blocks.~~ (all brownfield) is made. This is to be concentrated in the Key Service Centres primarily as an aid to regeneration initiatives (see paragraph 4.2.16). The windfall allowance has been expanded by the addition of 50 dwellings arising from Policy H17 of the JSP Proposed Modifications (September 2005). These are apportioned as 25 additional dwellings in each of the 2006-2011 and 2011-2016 time blocks. This also takes into account the move to embrace recycling targets as per Table HS4, looking to achieve 70% brownfield development by 2011/16. The Council will grant planning permission in line with Table HS7 and will continuously monitor both the cumulative area totals of consents and the build rate on the ground. Where slippage begins to occur in bringing forward any of the allocated sites (Table HS7) the Council will consider granting permission for a nearby alternative in the same Key Service Centre or Local Centre as the allocated site or if none is available, one within the same market area Key Service Centre or Local Centre. Sites in adjoining market areas may be considered where there is no ready solution otherwise. Sites allocated for development later in the plan period if suitable could be brought forward as part of this process. In all cases the Council will require the total number of dwellings, densities and character of the site and the development to replicate those of the subject for replacement. Priority will be given to brownfield sites so long as their characteristics are otherwise acceptable. The Council will expect developers and landowners to ensure that any constraints to development of the allocated sites are addressed during the appropriate timeframe otherwise they may have to be discounted and alternatives accepted in their stead. Should alternatives not be brought forward at the appropriate time the Council will undertake a further assessment of options including sites identified in its Urban Capacity Studies to replace allocations.

Table HS8 : The Managed Release of Housing Land

<u>Market Areas</u>	<u>Existing p/p at 30.9.04</u>			<u>Allocations</u>									<u>Windfall Allowance</u>
	<u>G</u>	<u>B</u>	<u>Total</u>	<u>to 2006</u>		<u>2006 – 2011</u>		<u>2011 – 2016</u>		<u>Totals</u>			
				<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>Total</u>	
<u>Whitehaven inc Moresby Parks</u>	<u>43</u>	<u>129</u>	<u>172</u>	<u>105</u>		<u>156</u>	<u>50</u>	<u>40</u>	<u>27</u>	<u>301</u>	<u>77</u>	<u>378</u>	
<u>Cleator Moor + Cleator</u>	<u>6</u>	<u>22</u>	<u>28</u>			<u>90</u>	<u>30</u>	<u>25</u>	<u>65</u>	<u>115</u>	<u>95</u>	<u>210</u>	
<u>Egremont Bigrigg Moor Row</u>	<u>147</u>	<u>85</u>	<u>232</u>			<u>55</u>	<u>35</u>	<u>65</u>		<u>120</u>	<u>35</u>	<u>155</u>	
<u>Arlecdon/Rowrah, Frizington</u>	<u>6</u>	<u>44</u>	<u>50</u>				<u>45</u>		<u>20</u>		<u>65</u>	<u>65</u>	
<u>Distington Lowca/Parton</u>	<u>88</u>	<u>11</u>	<u>99</u>				<u>12</u>				<u>12</u>	<u>12</u>	
<u>Ennerdale Kirkland, Lamplugh</u>	<u>1</u>		<u>1</u>	<u>10</u>			<u>32</u>			<u>10</u>	<u>32</u>	<u>42</u>	
<u>St Bees</u>	<u>11</u>	<u>3</u>	<u>14</u>										
<u>Others North Area</u>	<u>52</u>	<u>15</u>	<u>67</u>										
<u>Total North</u>	<u>354</u>	<u>309</u>	<u>663</u>	<u>115</u>		<u>301</u>	<u>204</u> <u>174</u>	<u>130</u>	<u>112</u>	<u>546</u>	<u>316</u> <u>286</u>	<u>862</u> <u>832</u>	<u>410</u> <u>465</u>

<u>Market Areas</u>	<u>Existing p/p at 30.9.04</u>			<u>Allocations</u>									<u>Windfall Allowance</u>
	<u>G</u>	<u>B</u>	<u>Total</u>	<u>to 2006</u>		<u>2006 – 2011</u>		<u>2011 – 2016</u>		<u>Totals</u>			
				<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>Total</u>	
<u>Beckermert</u>						<u>14</u>				<u>14</u>		<u>14</u>	
<u>Seascale</u>	<u>5</u>	<u>16</u>	<u>21</u>			<u>20</u>		<u>10</u>		<u>30</u>		<u>30</u>	
<u>Others Mid-Area</u>	<u>29</u>	<u>13</u>	<u>42</u>										
<u>Total Mid</u>	<u>34</u>	<u>29</u>	<u>63</u>			<u>34</u>	<u>0</u>	<u>10</u>	<u>0</u>	<u>44</u>	<u>0</u>	<u>44</u>	<u>151</u>
<u>Millom and Haverigg</u>	<u>-2</u>	<u>131</u>	<u>129</u>	<u>10</u>		<u>20</u>	<u>30</u>		<u>30</u>	<u>30</u>	<u>60</u>	<u>90</u>	
<u>Others South Area</u>	<u>9</u>	<u>3</u>	<u>12</u>										
<u>Total South</u>	<u>7</u>	<u>134</u>	<u>141</u>	<u>10</u>		<u>20</u>	<u>30</u>		<u>30</u>	<u>30</u>	<u>60</u>	<u>90</u>	<u>156</u>
<u>TOTALS</u>	<u>395</u>	<u>472</u>	<u>867</u>	<u>125</u>	<u>0</u>	<u>355</u>	<u>234</u> <u>204</u>	<u>140</u>	<u>142</u>	<u>620</u>	<u>376</u> <u>346</u>	<u>996</u> <u>966</u>	<u>717</u>
<u>Permission/ Allocations</u>	<u>2002 - 2006</u>			<u>2006 - 2011</u>		<u>2011 - 2016</u>							
	<u>992</u>			<u>589</u> <u>559</u>		<u>282</u>							
<u>Windfall Allowance</u>	<u>208</u>			<u>361</u> <u>416</u>		<u>148</u> <u>173</u>							
<u>Total</u>	<u>1200</u>			<u>950</u> <u>975</u>		<u>430</u> <u>455</u>		<u>+ 30 Special Needs (see 4.2.16)</u>					
<u>Recycling Balance</u>	<u>G</u>	<u>B</u>		<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>	<u>G</u>	<u>B</u>				
	<u>520</u>	<u>680</u>		<u>355</u>	<u>595</u> <u>620</u>	<u>140</u>	<u>290</u> <u>315</u>						
<u>%</u>	<u>43</u>	<u>57</u>		<u>37</u> <u>36</u>	<u>63</u> <u>64</u>	<u>33</u> <u>31</u>	<u>67</u> <u>69</u>						

POLICY HSG 3 : Plan, Monitor and Manage

~~To move towards regional targets for the recycling of previously used land and buildings. The Council will grant planning permission will be granted in line with the provisions of Table HS8. Continuous monitoring will be undertaken to ensure progress is being made and alternative sites may be considered in the later stages of each time block should slippage in the programme become apparent. for an average of 190 dwellings a year over the plan period. To achieve regional targets for the recycling of previously used land and buildings it will prioritise such development over time and will monitor performance annually. It will refuse Planning permission will be refused where proposals would significantly exceed the targets indicated in Table HS58 for the appropriate time block.~~

The release of land for housing purposes will be carefully managed in accordance with the provisions of Table HS7 and HS8. These incorporate phasing requirements for sites allocated in the Plan with allowances for “windfalls” and special needs development. They also incorporate a balanced approach to achieving targets for recycling of previously used land and buildings. Continuous monitoring will be undertaken to ensure that planning permissions granted in line with these provisions deliver a similar build rate on the ground during the time blocks indicated in Table HS8.

Planning permission will be refused where proposals would significantly exceed the targets indicated for each timeblock. However, should slippage occur in the phased delivery of allocated sites, alternative sites may be considered in the later stages of the relevant timeblock.

- 4.3.5 The windfall allowance (ref 4.2.16-18 and Table HS8) will ~~for the most part be made up of~~ also caters for individual or small area ~~scale~~ housing developments, ~~usually of ten or less dwellings, on sites~~ within the Development Boundaries of Settlements prescribed in Policy DEV 4. ~~This will only involve previously developed land and buildings. Design must be in accordance with other plan policies and the rate and distribution of the allowance will be managed in accordance with Table HS8. No greenfield alternatives will be permitted under the windfall provisions. The sequential test in Policy DEV 4 will also apply requiring priority for the reuse of existing buildings followed by reuse of previously developed land and only then use of greenfield sites. Proposals which involve greenfield sites must be accompanied by survey material~~

~~which shows that there are no readily available alternative premises or brownfield sites within the neighbourhood or village which could accommodate the type of development being proposed during the same time block. In this way most of the windfalls arising will be brownfield. Where exceptionally greenfield development is sanctioned the Council will consider its effect on the recycling balance and look to compensate the figures at a later stage by decreasing the rate of new greenfield development on sites elsewhere in the particular market area. The physical suitability of sites will be measured against the requirements of Policy HSG 4 where the term "infilling" as used in Policy HSG 4 relates to filling a site in an otherwise built up frontage with direct road access. Backland development which would involve joint access arrangements will not be sanctioned because of the privacy and overlooking problems which can arise. It must be stressed, however, that not all infill possibilities will be approved since it may be desirable to leave some gaps as essential features in the street or village scene. Some important areas of open space within settlement boundaries are in any event protect by virtue of Policies ENV 9 and SVC 19 13. Other plan policies which will have particular relevance here are Policies DEV 7 and HSG 8.~~

POLICY HSG 4 : Housing Within Settlement Development Boundaries

Within the defined limits of settlements prescribed by Policy DEV 4 ~~and in accordance with the priority sequence it lays down~~ proposals for ~~small scale~~ housing redevelopment ~~involving existing buildings or previously developed land~~ or ~~development in the form of infilling, conversion or rounding off~~ will be permitted ~~in accordance with the provisions Table HS8 and~~ subject to the requirements of Policies DEV 6 and HSG 8. ~~other plan policies.~~