



Title	Response to NuGen Stage 1 Strategic Issues Consultation
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The Council acknowledge the stage 1 strategic issues consultation issued by NuGen and would offer the following comments and observations in response.

It is recognised that this consultation precedes later detailed consultation but seeks to anticipate the submission of an application for a Development Consent Order and the related preparation of a statement of common ground and local impact report.

A separate document provides for the Council's comments in respect of the consultation from the Planning Inspectorate relating to Nugen's submission of a request for an environmental Impact Assessment Scoping opinion.

Previous response has been provided in respect of a Statement of Community Consultation. Comments made by the Council in response to this Stage 1 consultation should be used to inform the structure and content of later consultation and the content of the SOCC as it is amended to reflect these later stages. The Council intends to comment on the adequacy of the consultation process through stage 1 and to further respond when NuGen produces a promised analysis of responses to the consultation exercise.

The Council's response takes the form of this general statement and summary which is supported by the appended technical appraisal which has been commissioned by the Council from ARUP. The statement seeks to provide an overall appraisal of the Council's position, to identify emerging strengths of the project as it currently stands, to highlight weakness and also to comment on

aspects of the proposal which are insufficiently well formed at this stage of the project to enable adequate analysis and response.

Whilst this consultation early in the formulation of the project is welcomed, particularly based on an assumption that this enables the consultation to realistically inform the detailed design and form of the development – it is a matter of concern that the nature of the wider project as currently presented is based on a considerable number of assumptions many of which are not thoroughly evidenced.

It is accepted that the process of designing the project is inevitably iterative. It is considered however that the Council must highlight those areas where appraisal and understanding of the impact of the on the residential and business communities in Copeland, is currently constrained as a consequence of the limited information available.

This particularly relates to the understanding of the requirements for a construction workforce, the manner in which that workforce will be established and the consequences for accommodation, transportation and skills development strategies. As it stands the Council's ability to respond effectively to consultation is constrained by the absence of clarity over the absence of a clear and evidenced strategy which supports underlying principles of the project. It is accepted that this information will evolve as the project as a whole develops, but it needs to be noted that the timetable established by NuGen for the submission of the DCO is incredibly challenging. The ability to understand and respond appropriately to this evolving position must represent a risk in the projects progression and particularly the ability of the Council to be assured that the interests of the community which it represents can be adequately appraised and reported.

It is also considered that there are weaknesses in submissions to date which fail to show clarity of understanding of the complex relationship of the Moorside development with the neighbouring Sellafield site and issues which arise as a consequence of two extremely large operations occurring simultaneously on adjoining sites. Whilst it is anticipated that these concerns can managed and mitigated, the Council is yet to be convinced that this complexity is fully understood and addressed.

The Council welcomes consistent reference to the ambition to deliver lasting legacy from the project. It is intended that the Council will utilise increasing understanding of the detail of the project to inform expectations of legacy benefit in the form of improved transportation infrastructure, long term socioeconomic benefit including opportunities for local supply chain development and maximisation of the employment of local people, the legacy of a broader and higher quality housing stock, improved health and leisure infrastructure and higher levels of health and wellbeing.

### **Core Assumptions and submission accepted by the Council.**

#### **Site suitability**

The Council accepts the logic of locating a major nuclear facility on the Moorside site. It is accepted that the principle of the development is already established in the National Policy Statement for Energy and the National Policy Statement for Nuclear Energy Generation. The acceptance of this position is reinforced given that this development presents an unrivalled opportunity to place additional nuclear related development in a location which contains an a unique concentration of nuclear skills and expertise, largely but not exclusively based around the presence of the waste management and decommissioning capabilities based at Sellafield.

It is acknowledged that there is limited scope to comment on the technical suitability of the site to accommodate the three reactor proposed. It is recognised however that the precise position of reactors on the site as a consequence of ground and geological conditions will inevitably result in fundamental change to the current access arrangements for Sellafield. Additionally, it has been indicated that there will be a need for extensive engineering and excavation to meet technical requirements to place reactors on the site. The precise implications of these two factors are as yet not clarified in detail. The alteration to Sellafield access must produce a legacy of improved access to the SL site, supporting wider transport, access and logistical improvements which are long overdue in the management of the SL complex.

The management of site preparation and the extent of excavation needs early resolution in order to understand the full implications for the management of

excavated material on the site or the logistics of moving large volumes of material. It is a particular matter of interest to the Council the need to deal with this issue early in the development process will dictate resolution in anticipation of the DCO – through a separate application made through the Town & Country Planning Act. The volume of spoil produced and the management of the excavated material requires absolute clarity early in the process leading to stage 2 consultation. The level to which the stage 1 consultation assumes scope to manage spoil on site through alteration to land form appears not to be based on any substantive evidence or discussion with principal regulatory bodies at this point in the process. The scope to handle and utilise spoil in conjunction with other large scale development proposals should be assessed and appraised as detail of the project emerges

### **Skills and Employment**

The Council welcomes the commentary within section 4.2 of the Strategic Issues Consultation Document relating to Employment Benefits; Skills and Training Benefits. Assumptions based around the principle of maximising opportunities for local people are supported. Notwithstanding the initiatives around skills development and training established through the Centre of Nuclear Excellence (CoNE) and through the Cumbria LEP, NuGen will need to quickly develop a Skills and Employment Strategy in order to ensure that current assumptions can be delivered.

Commentary within the Executive Summary of the technical appraisal appended to this document highlight a number of areas where it is considered that skills development and employment issues are considered to have been inadequately appraised at this stage of the project.

The provision of employment opportunities and the creation of a local workforce with skills which build upon the existing areas of nuclear expertise is stated as a key area of legacy delivered by the Moorside Project. A Skills and Employment Strategy must reflect the scope to engage those residents of Copeland who otherwise be unable to take advantage of the opportunities presented by the Moorside project. This must reflect the range and nature of skills and employment opportunities beyond pure construction of nuclear plant

and should take account of opportunities of construction of accommodation sites and the service needs of those sites. The later stages of consultation will need to demonstrate that provisions have already been initiated having regard to the ambitious timeframe for bringing this project to fruition.

It is noted elsewhere in this response that clarity in understanding the workforce profile is fundamental to a range of issues in understanding and developing this project. The need for construction worker accommodation; the nature of transport strategies are predicated on the way labour resource is provided to enable the development to proceed.

### **Transportation Strategy**

The council welcomes the principle of a rail based strategy to meet the major transport needs of the development. It is recognised that irrespective of interventions, the existing highway network is not capable of upgrade to a point where it would satisfactorily able to meet the requirements of the proposed development, and provide for an ongoing legacy of a transport infrastructure which is supportive of a growth agenda for West Cumbria. There are significant issues relating to the suitability of existing transport infrastructure to adequately accommodate current demand. Whilst it is accepted that NuGen should not be required to deliver solutions to existing problems, it is imperative that the potential impact of current issues on the effective completion of the Moorside development and the unique opportunity for holistic and comprehensive approaches to transport and logistics in the locality of the development are addressed.

Subsequent comments note reservations as to the as yet unevidenced manner in which the assumption that the rail network provides a robust and dependable transport solution to passenger and freight requirements of the development. The development of the rail infrastructure on the West Cumbrian coast is seen as the most effective manner of supporting ambitions for growth and exploitation of the unique scope for West Cumbria to operate at the core of a Centre of Nuclear Excellence to the benefit of the wider UK economy. Improvements in rail infrastructure provide a realistic prospect of supporting resolution to existing transportation issues, particularly those associated with

the use of the A595 for access to Sellafield. There is a clear requirement for a joined up approach to the creation of infrastructure which serves the requirements of the proposed development, supports the Sellafield program and provides a legacy upon which future growth can be established.

Whilst the general approach to transportation particular of construction workers to the site is welcomed, the ability to deliver the rail based strategy is at this stage not evidenced. Consideration will need to be given to incentivise of use of the preferred modes and deterrents necessary to prevent use of the private car. It must be recognised that development will be taking place in a context where travel to the Sellafield site is viewed as an unacceptable impact which is unlikely to be resolved without substantial investment in road infrastructure.

The transportation strategy needs to consider the transportation of temporarily accommodated workers to accommodation sites. It also needs to consider and explicitly manage the movement of permanently resident workers to the site during construction and in the power stations operational phase.

### **Associated Development sites and worker accommodation**

The intended location of associated development sites raises issue in terms of compliance with the provisions of the development plan. With the exception of the Whitehaven town centre the locations are outside defined settlement boundaries. Development in these locations must be justified in this context. The Council is nevertheless adopts a supportive approach to the concept of locating accommodation sites close on the edge of existing settlements. This is considered to provide the greatest scope for securing economic benefit to the existing settlements within the borough.

These sites have been identified following some initial collaboration with the Council. It is recognised that some sites raise more complex issues in terms of their development potential. These sites were deliberately identified as they provide an opportunity for the project to deliver economic and physical regeneration which may be more challenging to achieve. It would be unacceptable to discount such sites in favour of areas of search where development might be subject to fewer constraints.

It is considered that with careful master planning and consideration of the range of uses within the associated development sites worker accommodation can be provided in a manner which is both sustainable and brings potential for supporting wider improvements to transport infrastructure in Copeland. This relates particularly to the support to improvements to the West Cumbrian railway line. Improvements to transport infrastructure would assist in realisation of wider growth plans for the Borough and would potentially support the ability to manage existing transportation issues particularly around the use of the A595.

The development of AD sites should not be focused on worker accommodation requirements in isolation but should also reflect the scope to provide a wider range of training, social and health care and leisure facilities. It is critical that worker accommodation and the use of AD sites is viewed in terms of long term legacy, not shorter term requirements to support construction. The development of these sites should be seen to support the aspirations growth within Copeland and should demonstrate opportunities for positive socio-economic impact within the principal host community for the development.

As with other issues the ability to properly assess the impact of the proposed associated development sites is hindered by the lack of clarity over the precise makeup of the construction workforce, highlighting again the need for the process leading to later stages in consultation to focus on work force strategy and configuration.

There is a considerable and wide ranging opportunity to consider the reuse of existing buildings for accommodation to meet the requirements of NuGen and after the construction process. Under-utilised buildings within existing settlement centres should be utilised in support of the development and to ensure maximum environmental and legacy benefit can be secured

### **Technical appraisal**

In general terms the Council finds the submissions within the Stage 1 consultation to be technically proficient. Whilst some issues of detail within the technical response appended to this paper and within the response to the PINS consultation on the EIA Scoping Report identify areas requiring further work, it

is considered that the project has generally followed a robust approach to the assessment of technical issues.

### **Key areas to be addressed**

The Council identifies a number of weaknesses in the current proposal which require consideration as the project evolves.

- **Work force strategy**

Key concerns:

- Proportion of workforce sourced locally.
- Understanding of impact on existing local labour market – diversion of employment to NuGen.
- Implications for the identification of skills and training.
- Character of a work force brought into West Cumbria.
- Implications of work force original location.
- Ambiguity and absence of clarity over numerical scale of workforce. Conflicting comments in consultation documents suggested 4 or 6 thousand construction workers

The absence of clarity over workforce strategy is a clear weakness in the proposals currently tabled. At the present time the submissions provide little or no scope to understand the workforce requirements to support the development. This hampers meaningful commentary on a range of other issues which arise from the fundamental need to understand how the construction workforce might be configured.

It is clearly the expectation that the greatest possible use is made of the local labour force. At this time there would appear to be limited understanding of the potential capacity of the existing pool of labour. Indeed the appraisal of the potential pool is itself confused, based as it is on potential travel to work pattern based on a car focused model split. This contradicts aspirations stated elsewhere for the transportation requirements of the development to be rail focussed. At this stage there is limited assessment of the potential training requirements and skills development opportunities which might be put in place

to ensure that any potential capacity within the existing local labour pool is fully utilised before consideration is given to alternative sources.

There must be consideration of how a workforce strategy might affect the existing labour market and the scope for workers to be drawn to new opportunities to the detriment of existing businesses.

The nature and scale of workforce requirements are fundamental to transportation and proportion of the potential workforce which will be normally resident in the area. It is not possible as a consequence to understand the scale of construction worker accommodation, when during the construction process that accommodation will be required and how workers might move from accommodation to the site. This would be complex even if proposed development was taking place on transportation infrastructure which was currently operating satisfactorily

In turn the nature of accommodation and transport requirements are fundamentally linked to understanding the manner in which management of the effects of the development can be designed so as to maximise legacy benefits in the longer term. The absence of such detail makes assessment of potential economic benefits and to maximise potential benefit to the local supply chain.

- **Accommodation**

Key concerns

- Consultation documents imply that there are options over the number and scale of accommodation sites. This is not the Council's position. Whilst the benefit of a larger site is understood – accommodation should not be focused on one large site in a single location. The benefits which are potentially derived from accommodation sites must be spread across the search areas identified and beyond
- It should be made clear that contractor facilities on site should only include facilities specifically required for the daily operation of the construction site. Such facilities should not include any form of residential accommodation. General office, training and similar facilities should be located within AD sites.

- Specific character of use of accommodation sites informs transportation strategy – the project lacks clarity in this regard.
- All accommodation provision is currently focused on settlements in the north of Borough. The scope for development sites in the south of the Borough must be explored.
- Character of accommodation left as legacy and potential influence on local housing market. There is no current understanding of the form of residential legacy left as a consequence of the development; the viability of building conversion once construction workforce requirements have finished and the type of permanent residential accommodation to be provided
- Whitehaven town centre site and key regeneration opportunity. It is accepted that benefit can be derived from the development of key sites on the edge of existing settlements. Development will not be considered acceptable unless it can be demonstrated that the pattern and distribution of use is consistent with the Council's adopted policies which seek to ensure that a legacy of the new build project is vital, viable and regenerated town centres.
- Issues of accommodation design and integration into local communities.
- Social and community cohesion.
- Access to and use of local facilities.
- How will facilities for construction workers on AD sites be accessed by the community during and after the construction process.
- Concentrations of construction workers bring potential impacts on general practitioners and school provision.

The ability of the current consultation process to inform the detail of the development of the AD sites is welcomed, but the absence of any specific understanding of the form and nature of development on the AD sites equally presents a quandary in limiting the scope for accurate appraisal.

Links to concern over the implications for transportation strategies are noted above. There are implications from the precise make up of any construction work force and the design of worker accommodation in terms of impact on social cohesion, community impact, impact on the local housing market. The Mirehouse site for example is located adjacent to one of areas in Copeland with high levels of deprivation. It is essential that worker accommodation is not

occupied as an exclusive, isolated enclave and demonstrably links to existing communities.

The consultation recognises the scope for associated development to secure regeneration opportunities which have not been possible previously. The ability to secure delivery of development of land to the southern edge of Whitehaven town centre offers a key legacy opportunity in this regard, providing scope for regeneration and the opportunity to provide opportunities to accommodate growth

The nature of development on the AD sites has the potential to influence the availability and provision of health care facilities and provision. It is expected that later stages of consultation will demonstrate how this might be achieved both during the course of the construction process

- **Logistics**

Key concerns

- Approach to logistics not yet well formed. More information is required about the source of materials and ability to direct via most sustainable transport mode.
- Procurement strategy should be clarified to demonstrate prioritisation of sourcing via local supply chain reducing the need for transportation; and where local sourcing is not possible strategy linked specifically a logistics strategy underpinned transportation to site by rail.
- Logistics strategy needs to set principles for the proportion of material moved to the site by alternative modes.
- Potential for NuGen instigated infrastructure development to facilitate wider benefits across the transport network of West Cumbria – supporting potential for growth and prompting others to refocus an approach to transport and logistics
- Alternative sea access routes to the south of the site should be identified to increase resilience and dependence on Port of Workington.
- Clarity in use of port vs use of MOLF

It is of concern that the approach to logistics – particularly the movement of construction materials to the site is as yet not fully formed. Whilst the use of the Port of Workington and focus on rail borne movement of materials, there is no clear understanding of the practical implications of such an approach. Can the port accommodate the level of traffic expected? Is access to the port adequate to enable the transfer from sea to rail? If the port is to be used for freight consolidation is road access acceptable. If it is not is any investment on road infrastructure here the best means of securing long term benefit and legacy.

At this stage there appears to be limited understanding of the work needed in order to bring the railway to a position where capacity is adequate to meet the needs of the development. The timing of improvements to rail infrastructure is critical given expected long lead in times needed to bring improvements to fruition. There is a need to ensure that rail infrastructure is sufficiently robust to provide a long term and resilient means of service the site. It is essential to ensure that any potential points of failure of the rail network are identified and clear and effective strategies in place enable any issue to be quickly resolved. Reversion to a road based solution would be unacceptable.

- **Cumulative Impact**

Key concerns

- Assessing the impact of concurrent large scale projects
- Logistical impacts – transport of materials and excavated material
- Competition for employment – scope for joint strategies
- Scope for joint approaches to logistics and procurement
- Assessment of cumulative impact should have regard to the scale and nature of development activity relating to waste management and decommissioning within the Sellafield complex

The consultation identifies and lists other major development projects expected to be taking place in West Cumbria as the Moorside project comes to fruition. There is no appraisal at this time as to the potential for conflicting demands on resources, labour, and infrastructure.

Whilst it is known that NuGen has engaged with Sellafield in order for mutual understanding of issues which will impact upon the operation of the Sellafield site and Moorside, the scale of impact is not reflected in consultation documents at this stage.

- **Resilience**

Key concerns

- Relationship of transportation strategy with emergency planning processes for NuGen and Sellafield sites. This relates to issues highlighted in commentary relating to the cumulative impact of major developments by NuGen and the Sellafield site happening at the same time.
- Resilience of rail infrastructure.
- Need to ensure that transport infrastructure is resilient and that there is clarity over management of any failure. It would not be an acceptable alternative to divert traffic to the roads in the event of a breach of the rail network. Contingency planning must be factored into transportation strategies.

- **Impact of infrastructure works**

Key concerns

- Appraisal of impact of works required to infrastructure
- Economic and practical impact of alterations to rail infrastructure on existing service provision.
- Economic and practical impact as any highway infrastructure improvements are implemented.
- Loss of amenity through noise and disturbance as infrastructure improvements are implemented.

- **Site specific issues – Whitehaven town centre/Corkickle**

Key concerns

- Key regeneration site identified in development plan. Proposals should demonstrate scope for providing not only for NuGen worker accommodation but also for training, HR, welfare and other facilities.
- Scope for site to contribute to growth aspirations focused on town centre. Should demonstrate alignment with development plan expectations in provision of town centre related facilities including office accommodation, town centre parking.
- Parts of the site known to have habitat/ecological issues which should be are not readily resolved through piecemeal development.
- Clarity in the management of the use of Corkickle railway station including use by the wider community, not just those residing within worker accommodation. How will road traffic be diverted to alternative rail hubs?

- **Site Specific issues – Mirehouse**

Key concerns

- The Mirehouse search area is located outside any currently identified settlement boundary. The site has potential for development for associated development on the basis of potential to exploit proximity to the Cumbria Coast railway line; the potential for a beneficial relationship with adjoining residential areas and critically the potential to exploit a location adjacent to the West Cumberland Hospital and the West Lakes Science and Technology Park.
- It is important to fully considered the impact of alternative uses of the site. Whilst a potentially useful focus of construction worker accommodation such concentration would be unacceptable if detracting from scope for development to have positive regenerative benefits elsewhere.
- The ability to ensure that a rail halt can be provided and deliver lasting legacy benefit is as yet unproven and may depend on as yet unspecified improvements in signalling. It would be unacceptable for a new station to be created as the cost of closure of an existing facility. Improvements

in rail facilities solely for the use the construction workforce would be unacceptable.

- Legacy uses must explore the scope to provide accommodation which would support the expansion of the existing presence of academic institutions of the Science Park, through suitable educational facilities or the legacy use of worker facilities for student accommodation. This supports the core principles for the area to exploit its status as the UK Centre of Nuclear Excellence.
- There is a clear community expectation that the presence of large numbers of personnel associated with the Moorside development will not diminish health infrastructure provision and will bring improvements to health facilities. The next stages of development should seek to demonstrate the potential for construction related development to provide such facilities during and after the course of construction. Given the proximity of this site to the WC Hospital it is logical that these opportunities should be explored in conjunction with this site.

- **Site Specific issues Cleator Moor and Egremont**

Key concerns

- The scope for the creation of appropriately scaled development in Cleator Moor and Egremont creates clear opportunities for regeneration of the centres of these settlements.
- These settlements provide scope for permanent residents employed in the project to access transportation to the site, minimising use of a highly congested local highway network.
- In the case of Cleator Moor the potential relationship of associated development with proposals for a new indoor recreational facility – West Lakes Extreme should be exploited.
- The Leconfield Industrial Estate presents a core opportunity to make provision for the Moorside development in a location where considerable socioeconomic and regeneration benefits can be realised.
- In Egremont AD search areas are relatively remote from the core business area of the town. AD development should demonstrate how AD will be of benefit to the regeneration and economic viability of the centre.

- Egremont is the closest main settlement to the Moorside and Sellafield. There is historic pressure for business activity to locate close to the site. The scope for AD to support this activity should be explored in the detail of development in this location.

- **Scope to consider additional AD sites**

Key concerns

- The Council considers that it is essential to ensure that associated development are located so as to ensure that benefits are spread across the Borough. The scope for development of a transport hub to serve a potentially increasing resident population should be explored in Millom. The ability to use land identified in the emerging Site Allocations development Plan Document should be considered, alongside the potential to encourage supply chain presence within available commercial sites in Millom
- Consideration should be given to the scope for use of Millom port and legacy of improved port facilities.
- The scope to encourage use of existing supply chain activity through use and development of existing areas of commercial activity – Leconfield and Moresby parks should be explored and facilitate through the Moorside development. The regeneration and revitalisation of Leconfield Industrial estate is an essential requisite of the development.

- **Clarity of a legacy strategy**

Key concerns

- The stage 1 consultation is unclear as to any strategy around legacy. Whilst reference is made to skills development and employment activity there is no comprehensive appraisal of the scale and form of benefit.
- The design and form of accommodation on the AD sites must be aligned to future potential uses.
- The legacy of improved transport infrastructure must be defined. The scope for an additional railway station and long term improvements to

the rail service such as to encourage use must be evidenced and presented within the detail of the proposals.

- Legacy in the form of economic benefit to the area is insufficiently explicit. There is a need for greater clarity to ensure that investment in the project will result in greater spend in West Cumbria.
- It should be demonstrated that worker accommodation sites will not become self-contained enclaves and how a construction workforce will utilise spending in local communities in a manner which supports underlying objectives for a legacy of viable and vital settlements across the Borough.

- **Phasing**

Key concerns

- There is a need for a clear understanding of expected timescales for development beyond the Development Consent Order process. Such information becomes essential in order to understand phasing not only of development on the site but also the way in which associated development sites will be brought on stream and to inform supply chain and skills providers of the time periods available to secure arrangements necessary to facilitate development.
- There will be a requirement to elaborate upon the use of applications made under the Town & Country Planning Acts and the DCO process as part of the function of assessing an approach to the phasing of the delivery of the project.
- It is clear that a range of interventions and development activity will need to take place in advance of the commencement of construction in order for work force development to be in place and for infrastructure and facilities to be delivered prior to construction starting. This current stage of consultation does not consider the sequencing of actions and interventions necessary to ensure that impacts of the development are satisfactorily mitigated and legacy secured.
- It is a matter of concern to the Council as to how planning process and practicalities of construction can be satisfactorily managed in order to deliver infrastructure and worker accommodation in line with demands created by the construction process. It will be necessary to demonstrate

how infrastructure and facilities required to enable construction to commence can be appropriately provided prior to decisions on the DCO and the final investment decision.

- It would be unacceptable to the Council for impacts resulting from the start of the construction process in terms of requirements for accommodation and demands of the transport infrastructure to arise in anticipation of specific solutions.
- If the intended progress into deliberation over the Stage 2 consultation is to be productive it is essential that understanding of phasing and sequencing is secured immediately.
- Phasing must consider the arrangements which need to be instigated to ensure that changes to existing access arrangements to the Sellafield site can be both accommodated without detriment to the safe use of the public highway and provide the basis for a legacy of improved access.

- **Environmental Impacts**

Key concerns

- Absence of detail in the stage 1 consultation limits the scope for consideration of environmental impacts and potential for mitigation.
- Issues relating to visual and landscape impact; noise and vibration from development activity on the site and off the site (relating to infrastructure improvements); air quality will require further detailed consideration as more specific information on the detail of the project emerges.
- The Council recognises the sensitivities of the location in which the main development site is located. It is essential that all aspects of the development are designed so as to minimise impact on landscape within the Lake District National Park, the coast and seascape. This position is reinforced as a consequence of the cumulative impact of the NWCC Grid connection.

- **Other matters**

- The consultation documentation makes reference to a visitor centre. The purpose and function of such a centre should be clarified. The successful precedent of placing interpretative displays and information in Whitehaven town centre by Sellafield should be explored.

- The C2C route runs through 3 of the AD sites - The Ginns, Mirehouse and Cleator Moor - this is a major tourism asset. No consideration has been given to the impact on this route during construction on the worker accommodation sites, during the operation of those or as a legacy of development.
- Development and infrastructure improvements present a range of opportunities for coincidental benefit. The need for an improved rail infrastructure with commensurate service improvements presents opportunities for access to sites on the coast and within the National Park in a manner which is less dependent upon use of the private car and with a potential legacy of an expansion of the tourist offer of the Cumbrian coast.