## **COPELAND LOCAL DEVELOPMENT FRAMEWORK**

# West Whitehaven Supplementary Planning Document

## Sustainability Appraisal of Issues and Options Draft



November 2012

#### **EXECUTIVE SUMMARY**

The European SEA Directive requires that a Sustainability Appraisal be undertaken of any Local Development Document that is produced by a Local Planning Authority. The purpose of this Sustainability Appraisal is to identify in general terms whether the West Whitehaven Supplementary Planning Document (SPD) is likely to move the area towards or away from greater sustainability in the long term.

The Vision, Objectives and principles have been assessed against a set of 17 Sustainability Objectives:

	SA Objective Abbreviation	SA Objective (High Level Objective)
1	Biodiversity	To conserve and enhance biodiversity in Copeland
2	Landscape & Conservation	To protect and enhance place, landscape and buildings of historic, cultural and archaeological value.
3	Water Resources	To maintain and enhance the water quality of Copeland's inland and coastal water and coasts and to sustainably manage water resources
4	Climate Change	To promote adaptation to climate change
5	Flood Risk	To reduce flood risk in Copeland from surface water, rivers, estuaries and sea level change
6	Energy	Increase energy efficiency in the built environment and promote the use of renewable energy sources
7	Land Quality	To promote and improve land quality in Copeland
8	Air Quality	To improve air quality in Copeland
9	Waste & Recycling	To minimise waste production and increase re-use, recycling and recovery rates
10	Services & Facilities	To improve access to services and facilities in Copeland
11	Health & Wellbeing	To improve physical and mental health and well-being of people and reduce health inequalities in Copeland
12	Education & Skills	To improve education, skills and qualifications in the Borough
13	Sustainable Economy	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth
14	Leisure & Tourism	Support the sustainable development of the sustainable leisure and tourism industry
15	Housing	To improve access to a range of good quality housing that meets the needs of the Copeland community
16	Retail	To maintain, enhance and develop a diversity of retail services in the Borough
17	Transport	To enhance and develop sustainable transport networks in Copeland

Source: Copeland LDF Sustainability Appraisal Scoping Report – prepared by Scott Wilson (September 2009)

#### Vision

The SPD's Vision is shown here to be very sustainable, showing benefits for the environment, the local economy and for the health of neighbouring communities.

## Objectives

The objectives are sustainable. However, there is no statement relating to the protection and enhancement of the area's biodiversity so an additional objective has been suggested below. A small addition to Objective 7 is suggested

Suggested additional text for the objectives section:

7. To capitalise on opportunities linked to Britain's Energy Coast *and provide suitable accommodation for new small businesses in order to support a broader economic base.* 

It would be helpful if another objective was added:

**11.** To protect and enhance the biodiversity already present and prevent the fragmentation of habitats by prioritising the creation of wildlife corridors and stepping stones throughout the site.

## **Option 1: Industrial Heritage Zone**

There are some potential negative effects relating to biodiversity, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

## Suggested additional text for Section 6.3.1

A particularly high standard of architecture, construction and landscaping will be required for any new development in this area so that negative impacts on this very sensitive landscape are minimised. The building could also be an exemplar of sustainable construction incorporating grey water and energy efficient technologies, renewable energy generation, sustainable drainage and recycling facilities.

Access to Barrowmouth would be through part of the St Bees Head SSSI which is designated for its birdlife and geology. Care must be taken to ensure that damage from the additional access opportunities is minimised and that visitors are encouraged to stick to the footpaths in the most sensitive areas.

## **Option 2: Wildlife and Natural Environment Zone**

This option is the most sustainable in terms of the environment. It is also sustainable for the economy in that the option focuses on two of the most important tourism attractions in the area i.e. landscape and wildlife.

## **Option 3: Tourism and Leisure Zone**

There are some potential negative effects relating to biodiversity, water resources, flooding and waste. Adding the text suggested below may help to make the document more

#### sustainable.

Golf courses are large areas of intensively managed grassland that are generally of very little value to wildlife. If this type of development were to go ahead, consideration should be given to preventing the fragmentation of habitats with the inclusion of an adequate number of wildlife corridors and stepping stones.

It will be important that new buildings are sustainably designed and constructed to meet high standards of energy and water efficiency. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new facilities.

### **Option 4: Britain's Energy Coast Innovation Zone (Mixed Use Development)**

There are some potential negative effects relating to biodiversity, landscape, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

It will be important to mitigate the impact with careful landscaping and the creation of wildlife corridors to prevent habitat areas from becoming fragmented and to enhance biodiversity wherever possible.

It will be important that new buildings are sustainably designed and constructed to meet high standards of energy and water efficiency. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new facilities.

It will be important to facilitate waste and recycling collection within the development. This may involve the provision of a community waste recycling bank close to the centre of the site. It may also be advantageous to provide an area within the curtilage of each dwelling/business premises etc. where waste bins, recycling boxes etc. can be stored in a convenient place for waste collection purposes.

## **Option 5: Temporary Workers' Accommodation Zone**

There are some potential negative effects relating to biodiversity, landscape, water resources, flood risk, services, health and waste. Adding the text suggested below may help to make the document more sustainable.

A particularly high standard of architecture, construction and landscaping will be required for any new development in this area so that negative impacts on this very sensitive landscape are minimised. The buildings could also be an exemplar of sustainable construction incorporating grey water and energy efficient technologies, renewable energy generation, sustainable drainage and recycling facilities. It will be important to mitigate the impact on biodiversity with the creation of wildlife corridors to prevent habitat areas from becoming fragmented. Opportunities to enhance biodiversity should be taken wherever possible. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new development.

Careful consideration should be given to the possibility for increased pressure on existing essential services i.e. medical centres etc. The services may need to be enhanced temporarily to deal with extra demand.

## **Option 6: Renewable Energy Zone**

The SPD rules out large scale wind energy as it would have an unacceptable impact on the character of the landscape and have a significant negative effect on the biodiversity of the area. Instead the SPD asks developers to focus on other renewable energy technologies and suggests that the geological hotspot that is present in Cumbria is exploited for a neighbourhood heating system. The principle of utilising this type of heating is inherently sustainable as it is not based on fossil fuels. However, a full sustainability appraisal has not been carried out at this point as this type of renewable energy would be linked to another type of development i.e. housing (probably within the South Whitehaven SPD area) which is not described as part of the Option. (The sustainability of a residential development is dealt with in Options 4 & 5).

## **Option 7: Local Centre Zone**

There are some potential negative effects relating to biodiversity, landscape, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

A particularly high standard of architecture, construction and landscaping will be required for any new, preferably low-rise, development in this area so that negative impacts on this very sensitive landscape are minimised.

It will be important to mitigate the impact on biodiversity with the creation of wildlife corridors to prevent habitat areas from becoming fragmented. Opportunities to enhance biodiversity should be taken wherever possible. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new development.

The document highlights problems with the financial viability of such a development. It might not be appropriate for the developers to be asked to build to a particularly high standard of sustainable construction if this would be prohibitively expensive.

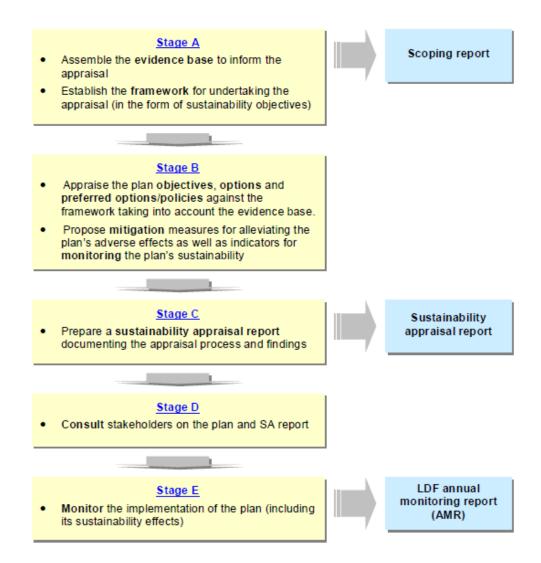
## Introduction

This Sustainability Appraisal accompanies the Issues and Options Draft of the West Whitehaven SPD. The purpose of this report is to identify in general terms whether the SPD is likely to move the area either towards or away from greater sustainability in the long term.

Sustainability Appraisal (SA), which is now integrated with Strategic Environmental Assessment (SEA), is a statutory requirement for the preparation of Development Plan Documents and optional for Supplementary Planning Documents. The UK Strategy for Sustainable Development (1999), SEA Directive (2001), Regulations (2004) and ODPM Guidance (2005) advise that the principal topics of concern in any sustainability appraisal will be whether the development proposals would achieve:

- Social progress that recognises the needs of everyone,
- Effective protection of the environment,
- Prudent use of natural resources and
- Maintenance of high and stable levels of economic growth and employment.

The Government's guidance on the Sustainability Appraisal process advocates a 5 stage approach:



## Process for Incorporating Sustainability Appraisal into Policy Development

We can see from the flow chart above that the SEA Directive requires the production of an Environmental Report that provides certain information. Table 1 below outlines the information requirements and how these have been met in the Sustainability Appraisal documentation that has been prepared.

Environmental Report Requirements	Document
An outline of the contents, main objectives of the plan or programme and	Chapters 2-11, 14 and
relationship with other plans or programmes	Appendix 1 of LDF
	Sustainability Appraisal Scoping
	Report
The relevant aspects of the current state of the environment and the likely	Chapters 2-12 of LDF
evolution thereof without implementation of the plan or programme	Sustainability Appraisal Scoping
	Report
The environmental characteristics of areas likely to be significant affected.	Chapters 2-12 of LDF
	Sustainability Appraisal Scoping
	Report
Any existing environmental problems which are relevant to the plan or	Chapter 2 of LDF Sustainability
programme including, in particular, those relating to any areas of particular	Appraisal Scoping Report
environmental importance, such as areas designated pursuant to Directives	
79/409/EEC (The Birds Directive – now superseded by Directive	
2009/147/EEC) and 92/43/EEC (Habitats Directive)	
The environmental protection objectives, established at the international,	Chapters 2-11and Appendix 1
Community or Member State level, which are relevant to the plan or	of LDF Sustainability Appraisal
programme and the way those objectives and any environmental	Scoping Report
considerations have been taken into account during its preparation	
The likely significant effects on the environment, including on biodiversity,	This document
population, human health, fauna, flora, soil, water, climatic factors, material	
assets, cultural heritage (including architectural and archaeological	
heritage), landscape and the interrelationship between the above factors	
The measures envisaged to prevent, reduce and as fully as possible offset	This document
and significant adverse effects on the environment of implementing the plan	
or programme.	
An outline of the reasons for selecting the alternatives dealt with, and a	Sustainability Appraisal of
description of how the assessment was undertaken including any difficulties	Preferred Options – Appendix 1
(including technical deficiencies or lack of know-how) encountered in	
compiling the required information	
A description of the measures envisaged concerning monitoring in	This document – SA Framework
accordance with Article 10.	– Table 2
A non-technical summary of the information provided under the above	This document – Executive
headings	Summary

#### The Sustainability Appraisal

The SA of the Issues and Options draft of the SPD is based around the Appraisal Framework in Chapter 15 of the Sustainability Appraisal Scoping Report (September 2009). The Framework provides a balanced assessment of potential environmental, social and economic effects relevant to Copeland. It is based on an objectives-led approach whereby the potential impacts of a plan are appraised in relation to a series of objectives for sustainable development.

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
1	Biodiversity	To conserve and enhance biodiversity in Copeland	To ensure that development does not impact upon the condition of sites of biodiversity interest including SSSI and other local and national designations	<ul> <li>Number of developments including landscaping schemes to benefit biodiversity</li> <li>Change in habitats and species rated priority in the BAP</li> <li>Number of developments including</li> </ul>
			To protect Natura 2000 sites from the adverse impacts of human activity, pollution and coastal erosion	<ul> <li>Number of developments including schemes to protect and/or enhance existing biodiversity</li> <li>Loss of designated habitat</li> </ul>
			To promote biodiversity provision and enhancement within new development and seek to link these to existing species and habitats.	
2	Landscape & Conservation	To protect and enhance place, landscape and buildings of historic, cultural and archaeological value.	Protect and enhance features of historical and archaeological importance which contribute to the cultural and tourism offer of the borough, including the LDNP. Ensure that all new development meets high standards in terms of the quality of design, safety, security, and accessibility and relates well to existing development and the public realm. Protect, conserve and enhance the character and quality of all landscapes and townscapes in the borough, especially those that contribute to local distinctiveness, such as the unique maritime	<ul> <li>Number of planning permissions refused on the basis of design</li> <li>% of new development meeting BREEAM standards</li> <li>Number of derelict properties</li> <li>% of Grade 1 and 2*Listed Buildings at Risk</li> <li>Number of parks with Green Flag status</li> <li>Number of up to date Conservation Appraisals</li> <li>Number of refusals due to impact on landscape character/ designation</li> <li>Permissions granted within an area of landscape designation</li> <li>Number of TPOs made</li> <li>Loss of TPOs</li> </ul>
			history of Copeland.	<ul> <li>Number of S106 enhancements resulting from planning applications</li> <li>Number of Listed Building enforcement actions.</li> </ul>
3	Water Resources	To maintain and enhance the water quality of Copeland's inland and coastal water and coasts and to sustainably manage water resources	Promote sustainable design and construction measures that reduce water consumption and result in decreased run-off of polluted water (including during construction phase. Encourage the allocation and location of new development where water abstraction can occur sustainably.	<ul> <li>% of main river water quality classified as good or fair (chemical or biological) under the general quality assessment.</li> <li>Daily Domestic Water Use (per person)</li> <li>Number of applications including SUDs</li> <li>Number of beaches with Blue Flag status.</li> </ul>

## Table 2 - Sustainability Appraisal Framework for Copeland's LDF.

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
			Ensure efficient use and management of water resources throughout the borough.	
4	Climate Change	To promote adaptation to climate change	Promote new development that minimises the emission of greenhouse gases. Seek to provide a built environment and green infrastructure network that will minimise the impacts on humans and the environment associated with climate change.	<ul> <li>Provision of renewable energy in new development</li> <li>% of development meeting Code for Sustainable Homes standards</li> <li>Number of planning applications including on-site renewables</li> </ul>
5	Flood Risk	To reduce flood risk in Copeland from surface water, rivers, estuaries and sea level change	Ensure new development incorporates SUDS. Avoid development in areas of flood risk and mitigate any residual flood risk through appropriate measures including through design.	<ul> <li>Number of approvals contrary to environment agency advice on flooding</li> <li>Number of approvals incorporating EA advice on flood mitigation guidelines.</li> </ul>
6	Energy	Increase energy efficiency in the built environment and promote the use of renewable energy sources	Promote high sustainable design and construction standards for housing and non-housing development, in order to ensure that Copeland meets the Government target for all new residential development being zero carbon by 2016. Clear guidelines and support for the use of renewable energy sources in new and existing developments.	<ul> <li>Energy efficiency – the average SAP rating of social housing (1 highly inefficient – 100 highly efficient)</li> <li>Provision of renewable energy in new development.</li> </ul>
7	Land Quality	To promote and improve land quality in Copeland	To protect and enhance soil quality in Copeland Develop brownfield sites where these can support wider sustainability objectives (e.g. reduce travel by car, improve the public realm, avoid loss of biodiversity interest, gardens etc.) Ensure new development will not result in contamination of land and promote the remediation of existing contaminated sites.	<ul> <li>% of development on greenfield sites</li> <li>(Ha) contaminated land reclaimed as Open Space/Natural Green Space or Development.</li> <li>% of contaminated land reclaimed in total</li> <li>% of new development on brownfield sites.</li> <li>% of development on protected open space</li> </ul>
8	Air Quality	To improve air quality in Copeland	Seek to reduce the amount of CO2 emissions attributable to the transport sector Reduce the number of journeys made by car in order to reduce the high levels of nitrogen dioxide in areas of traffic congestion in the borough Consider and mitigate the impacts on air quality that might result	<ul> <li>Estimated traffic flows for all vehicle types (million vehicle kilometres)</li> <li>% of development outside KSC and LSC</li> <li>CO2 emissions</li> <li>NO2 emissions</li> <li>Respiratory related health issues</li> </ul>

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
			from specific developments, including major infrastructure projects. Seek to promote opportunities for	
			incorporating clean and emission free technologies in new development.	
9	Waste & Recycling	To minimise waste production and increase re-use, recycling and recovery rates	Reduce the proportion of waste that goes to landfill in the borough Promote the integration of waste management facilities to enable efficient recycling and energy from waste as part of new developments. Ensure the safe disposal and storage of radioactive waste in the borough. Support the adaptive reuse of buildings where appropriate.	<ul> <li>Volume of household waste collected per person per year (kg per head)</li> <li>Number of new developments incorporating recycling facilities</li> <li>% household waste collected which is recycled/composted</li> <li>Number of derelict properties</li> </ul>
10	Services & Facilities	To improve access to services and facilities in Copeland	Provide improved physical access to services and facilities on foot, cycle and by public transport, particularly in rural and deprived areas. Secure economic inclusion in the most deprived wards in the borough i.e. access to jobs Ensure that issues of both rural and urban deprivation are considered in development proposals. Support the adaptive reuse of buildings where appropriate.	<ul> <li>% of rural households within set distances (either 4km or 2km) of key services.</li> <li>% of development in KSCs and LSCs</li> <li>Number of households within 30mins of key service centres by public transport.</li> <li>Number of planning applications refused on accessibility grounds</li> <li>% of the population with 20 mins travel time of different sports facility types</li> <li>Number of households (or proportion of population) with access to broadband</li> </ul>
11	Health & Wellbeing	To improve physical and mental health and well-being of people and reduce health inequalities in Copeland	Maintain accessible healthcare facilities throughout Copeland. Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision and improvement of sporting, recreational and community facilities in Copeland. Reduce crime and the fear of crime, by adhering to 'designing out crime' principles in all new development.	<ul> <li>Doctor/Patient ratio</li> <li>Length of cycleway created/maintained</li> <li>% adults taking part in sport</li> <li>Number of developments with restriction of opening hours / noise reduction measures</li> <li>Number of visits to leisure centres</li> <li>Design out Crime layouts included in application.</li> <li>% households with one or more person with a limiting long term illness</li> <li>Childhood obesity figures</li> </ul>
12	Education & Skills	To improve education, skills and qualifications	Improve linkages between higher education providers and local employers.	The percentage of pupils in schools maintained by the local

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
		in the Borough	Encourage educational and training opportunities for all sectors of the population, particularly amongst deprived communities.	<ul> <li>authority achieving for five or more GCSEs at grades A*-C or equivalent.</li> <li>% of the population whose highest qualification is a first degree (or equivalent)</li> <li>% of the population with no or low qualifications</li> <li>Levels of NVQ attainment</li> </ul>
13	Sustainable Economy	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	Retain existing jobs and create new employment opportunities Promote major employment in Whitehaven and Key Service Centres that can provide access to an available workforce Provide a positive planning framework for exploiting new opportunities in tourism, creative and knowledge based industries and the energy sector, including renewable energy technologies. Maximise the opportunities that the nuclear sector (decommissioning and potential new build reactor) offers, building on skills and expertise in Copeland. Provide support for economic development that is appropriate for rural locations, including small businesses or home based working. Seek to attract employment and training programmes specifically targeted at maintaining and increasing the proportion of young	<ul> <li>Amount of land supply available for B1, B2 and B8 uses</li> <li>Gross floor space of completed retail and leisure</li> <li>Gross floor space of completed B1, B2 and B8</li> <li>Amount of employment land lost to residential development per financial year (in hectares)</li> <li>Economic activity rate for males and females of working age (expressed as a % of all people of working age)</li> <li>ONS Annual Population Survey</li> <li>Proximity of jobs from residences</li> <li>% change in the number of VAT registered businesses.</li> <li>Unemployment rate % (male and female)</li> <li>GVA £ per capita</li> </ul>
14	Leisure & Tourism	Support the sustainable development of the sustainable leisure and tourism industry	people in the borough. Improve the quality of supporting infrastructure for tourism in the borough such as accommodation, leisure and cultural facilities. Encourage the use of the boroughs natural and cultural features for tourism development, within their environmental limits.	<ul> <li>Visitor numbers</li> <li>Tourism expenditure in the borough</li> <li>Tourism expenditure per head</li> </ul>
15	Housing	To improve access to a range of good quality housing that meets the needs of the Copeland community	Ensure that all new development meets the lifetime homes standards, in order to meet the needs of an ageing population Seek to develop mixed income communities and flexibility of tenure and housing type in the borough	<ul> <li>% of households rated unfit</li> <li>Number of unfit dwellings demolished</li> <li>Number of affordable homes completed</li> <li>Number of people on housing waiting list</li> </ul>

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
			Coordinate housing provision with investment in employment and community services to ensure that settlements Provide decent good quality and affordable housing for all including intermediate and key worker housing in line with housing targets.	<ul> <li>% of housing development incorporating community green space/ children's play areas</li> <li>Average house price</li> <li>Income to average house price ratio</li> <li>% of new homes meeting Lifetime Homes standard</li> <li>% of new homes scoring good or very good on Building for Life Standard.</li> </ul>
16	Retail	To maintain, enhance and develop a diversity of retail services in the Borough	Protect the shopping and community services function of Key and Local Service Centres Reduce the number of vacant retail properties in Whitehaven and the other smaller service centres in Copeland. Improve the quality if the public realm in order to improve the attractiveness of the service centres to new investment.	<ul> <li>Retail hierarchy and ranking</li> <li>Number of vacant premises</li> <li>New business start-up / closure rates</li> <li>Number of new business support initiatives or events</li> <li>Number of street scene improvement schemes</li> </ul>
17	Transport	To enhance and develop sustainable transport networks in Copeland	Improve the provision and quality of bus and rail services in Copeland, particularly in rural areas. Develop and maintain safe, efficient and integrated transport networks within Copeland, with good internal and external links. Reduce car dependency by providing services and facilities accessible by a range of modes of transport. Promote a pattern of development which reduces private vehicle dependency in the location of homes, jobs, leisure and community services.	<ul> <li>Methods of travel to work</li> <li>Vehicle ownership</li> <li>Distance travelled to work</li> <li>Number of road accidents</li> <li>% of development located in KSC and LSC</li> <li>Number of households within 30 mins of KSC by public transport</li> <li>Length of cycleways created / maintained (km)</li> </ul>

Source: Copeland LDF Sustainability Appraisal Scoping Report – prepared by Scott Wilson (September 2009)

The 17 criteria in the SA Framework are applied below to the West Whitehaven document: to the Aims and Objectives and Chapters 4 and 5, covering the detail of the development.

The assessment has been carried out in order to predict and evaluate the key potential impacts. We can then identify in general terms whether the development is likely to move the area towards or away from greater sustainability in the long term.

### Key to tables:

- ++ strongly positive
- + positive
- ~ neutral, no obvious effect
- negative
- -- strongly negative
- ? uncertainty, impacts not predicted

## West Whitehaven Vision

'By 2026, West Whitehaven will be celebrated as a special and unique place, where the industrial heritage, local wildlife, stunning coastal landscapes, and sweeping views are protected, managed and enhanced for the enjoyment of visitors and residents alike. The area will be a visitor destination in its own right, providing an attractive link between Whitehaven Harbour and St Bees Head. New development will be sustainable and sympathetically designed to sit comfortably within the coastal landscape and will provide long term employment opportunities linked to the Energy Coast. All routes and interpretation facilities will be designed and managed to ensure maximum accessibility for everyone.'

## **Assessment of Vision**

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	++	Local wildlife and coastal landscape will be protected, enhanced and managed. This in combination with measures introduced on the adjacent 'South Whitehaven' site should give biodiversity a boost, contributing to the areas attraction as a tourist destination.
2	Landscape & Conservation	++	The stunning coastal landscape and sweeping views will be protected, enhanced and managed. The area will provide an attractive link between Whitehaven harbour and St Bees Head. New development will be designed to sit comfortably within the landscape.
3	Climate Change	+	New development will be sustainable. Creating an attractive link between the town and St Bees Head will encourage walking and cycling from residential areas close by into the town centre thereby reducing car use.
4	Water Resources	+	New development will be sustainable. Whilst the vision quite rightly does not go into more detail than this, it can be assumed that sustainable development will incorporate technologies that reduce the use of drinking water.
5	Flood Risk	~	No significant impact anticipated.
6	Energy	+	'New development will be sustainable. Whilst the vision quite rightly does not go into more detail than this, it can be assumed that sustainable development will incorporate technologies that reduce energy consumption.
7	Land Quality	++	The land quality on parts of the site is currently very poor due to the past presence of polluting industries. Part of the vision states is to make the site as accessible as possible to local people and visitors to the area. This will involve some land remediation which should be paid for out of the profits from the partial development of the site. Clearly there are parts of the site which may never be accessible.
8	Air Quality	+	No significant impact anticipated.

9	Waste & Recycling	?	More development i.e. visitor attractions in the area will have a negative impact on waste and recycling. However, the vision says that
			development will be sustainable and therefore it is expected that recycling of waste will be a priority in the management of the site.
10	Services & Facilities	+	Providing access to jobs on the site would be of benefit to the local community.
11	Health & Wellbeing	+	The vision to create a place that unique and special, as somewhere where local people and visitors can come for recreational purposes has the potential to be really positive for local health and wellbeing. Another tourist attraction in the area should give a boost to the local economy too, and improved economy should have positive benefits for health and wellbeing.
12	Education & Skills	+	Making the most of the site's industrial heritage and biodiversity assets could involve good interpretation boards – providing an opportunity for learning outside the classroom for local school children. In terms of adult skills, the vision states that there will be long term employment opportunities, linked to the energy coast.
13	Sustainable Economy	++	Creating an additional tourist attraction will positively impact on the Whitehaven economy and creating long term employment opportunities linked to the Energy Coast should give a significant boost to the economy in Whitehaven and beyond.
14	Leisure & Tourism	+/++	The vision is to create a unique and special place that will be a visitor attraction in its own right and link up two of the areas significant assets i.e. the historic harbour and town centre with the St Bees Heritage Coast. If stakeholders are successful in achieving this benefits to leisure and tourism could be significant.
15	Housing	~	No significant impact anticipated.
16	Retail	+	An increased number of people visiting the Whitehaven area will add to the viability and vitality of Whitehaven's town centre.
17	Transport	+	The development will encourage people to move around more by foot/bicycle and therefore reduce dependency on the car for short trips.

The Vision is shown here to be very sustainable, showing benefits for the environment, the local economy and for the health of neighbouring communities.

## **Objectives:**

- 1. To provide an overarching planning framework for the protection, enhancement and development of West Whitehaven.
- 2. To ensure a co-ordinated approach to the area's regeneration and renewal, taking account of its location on the coastal fringe linking the Heritage Coast to Whitehaven Harbour.
- 3. To complement and support the planning frameworks provided by the South Whitehaven and Whitehaven Town Centre and Harbourside SPDs.
- 4. To ensure that all new development meets high standards in terms of design quality and sustainability, relates well to existing landscapes, enhances the public realm and reinforces the distinctive qualities of the landscape character areas.

- 5. To provide an environment that supports and encourages use by pedestrians, cyclists, the disabled and wheelchair users.
- 6. To improve links through the area and support connectivity between West Whitehaven and the Heritage Coast, town centre and harbour and local residential communities.
- 7. To identify priority zones for investment and development that will help strengthen and support the area's wider role for tourism, recreation and leisure uses.
- 8. To guide the improvement of visitor facilities and realise the potential of the area as a Tourism Opportunity Site, focussing on industrial heritage and the natural environment.
- 9. To support and progress the aims and objectives of the Colourful Coast initiative.
- 10. To capitalise on opportunities linked to Britain's Energy Coast.

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	?	There is no objective to protect and enhance biodiversity particularly although there is a general statement to protect and enhance the west Whitehaven area. It might be useful to make a specific reference to the biodiversity of the area.
2	Landscape & Conservation	++	The regeneration and renewal of the area, especially the former Marchon site will have a very positive impact on landscape and conservation. The benefits will be felt beyond the site boundary. Supporting the frameworks of the South Whitehaven and Town Centre and Harbourside SPDs will also help to ensure that all thee SPDs work together to have a significant cumulative positive impact on the Whitehaven area. One of the objectives is to ensure that all new development meets high standards in terms of design quality, enhancing the public realm and reinforcing the distinctive qualities of the various landscape character areas.
3	Climate Change	+	In terms of the types of development proposed for the site, the objectives do not say a lot, but there is a commitment to ensuring that development meets high standards in terms of sustainability. The site may also be able to offer space for employment, linked to the Energy Coast and in this way contribute positively to wider climate change goals.
4	Water Resources	2	Any additional development will put pressure on water resources in the borough. One of the objectives seeks to ensure that development on the site is sustainable i.e. development should incorporate technologies that reduce the use of drinking water. If this is the case then no significant negative impacts are anticipated.
5	Flood Risk	2	No significant impact anticipated.
6	Energy	+	One of the objectives seeks to ensure that development on the site is sustainable i.e. development should incorporate technologies that reduce the use of energy.
7	Land Quality	++	Part of the first objective is to enhance West Whitehaven. The objective does not go into detail as to what this will involve but one of the more significant issues on this site is the land contamination present. Enhancing the site and making it accessible to the public would involve at least some land remediation. Therefore there will be positive impacts for land quality.
8	Air Quality	+	One of the objectives is to provide an environment that supports and encourages use by pedestrians and cyclists and objective 6 is to improve

#### **Assessment of Objectives**

			the links through the area and support connectivity between the town centre, Heritage Coast and local communities. This will enhance the current walking and cycling network and should help to reduce the use of cars, therefore leading to improvements in air quality in the area and further afield.
9	Waste & Recycling	2	More development i.e. visitor attractions in the area will have a negative impact on waste and recycling. However, the fourth says that development will be sustainable and therefore it is expected that recycling of waste will be a priority in the management of the site. From what is written here in the objectives, no significant impacts are anticipated.
10	Services & Facilities	+	Providing access to jobs on the site would be of benefit to the local community.
11	Health & Wellbeing	+	The SPD objective 5 aims to provide an environment that encourages walking and cycling and provides good access to the disabled and wheelchair users.
12	Education & Skills	++	Objective 10 is to capitalise on opportunities linked to the Energy Coast. This will be positive as it could bring jobs to the West and South Whitehaven areas and perhaps provide training and opportunities in various types of renewable energy generation as well as nuclear technologies.
13	Sustainable Economy	+	Objective 7 aims to identify priority zones for investment and development that will support the area's tourism role and objective 10 is to capitalise on the opportunities that the area has as part of Britain's Energy Coast. Energy and tourism are two of the main income generators for Copeland so it is important that steps are taken to nurture both. However, it is also important to diversify the local economy if possible and it might be possible to add some text to this document supporting new businesses / industries etc.
14	Leisure & Tourism	++	Objective 5 is to provide an environment which supports and encourages use by pedestrians and cyclists and the disabled. Further objectives are to improve connectivity with neighbouring areas, the Heritage Coast and the town centre. Investment should be focussed in the priority zones that will help support the area's wider role for tourism, recreation and leisure uses. In addition the SPD also aims to support the Colourful Coast initiative. To guide the improvement of visitor facilities and realise the potential of the area as a Tourism Opportunity Site, focussing on industrial heritage and the natural environment. The SPD should have a noticeably positive impact on leisure and tourism in the Whitehaven area.
15	Housing	+	The objectives do not mention housing development but Objective 7 does suggest that part of the site will be developed. There is no suggestion as to what form the development will take but one could assume that there may some housing involved. If this is the case then there could be a positive impact on housing, especially If a mix of house types is provided. There is a large proportion of social rented housing in this area.
16	Retail	+	Improving the links through to the town centre will mean that visitors to the site will easily be able to access the town. More visitors to the area will improve the viability and vitality of the town centre. Providing employment on the site may also bring more people into the town centre during lunchtimes etc.
17	Transport	+	To provide an environment that supports and encourages use by pedestrians, cyclists, the disabled and wheelchair users. To improve links through the area and support connectivity between West Whitehaven and the Heritage Coast, town centre and harbour and local residential communities.

The objectives are sustainable. However, there is no statement relating to the protection and enhancement of the area's biodiversity so an additional objective has been suggested below. A small addition to Objective 7 is suggested

## Suggested additional text for the objectives section:

7. To capitalise on opportunities linked to Britain's Energy Coast *and provide suitable accommodation for new small businesses in order to support a broader economic base.* 

It would be helpful if another objective was added:

**11.** To protect and enhance the biodiversity already present and prevent the fragmentation of habitats by prioritising the creation of wildlife corridors and stepping stones throughout the site.

## **Option 1 – Industrial Heritage Zone**

Restoring and promoting the areas significant industrial heritage assets linked to the development of the Haig Mining Museum, including the museum itself, Saltom Pit and Barrowmouth Alabaster/Gypsum Quarry. The project would need long term investment and improvements to access and interpretation boards/education facilities. It is also suggested that the site could host a new Sellafield Visitors Centre that would provide up to date information on current and future low carbon technologies.

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	-	Access to Barrowmouth would be through the SSSI and this could have a negative impact on the geology for which the site has been designated. There are also a number of BAP species on the site including birds, insects and reptiles. Consideration will need to be given to the number and types of access paths provided and how to encourage visitors to stick to the paths. Additionally the land will have to be managed for the conservation of these species in order to mitigate any damage caused by a larger number of people walking and cycling through the site.
2	Landscape & Conservation	++	This option would enhance a number of very important Heritage Assets in West Whitehaven. The north of the site is adjacent to the Town Centre and Harbourside SPD area which has a wealth of heritage so improvements in both areas would be mutually beneficial. In terms of any new development on the site, the SPD acknowledges that site has a landscape character that would be highly sensitive to large scale or insensitive development. This perhaps needs to be reiterated anywhere in the document where new development is suggested.
3	Climate Change	~	There is nothing in this Industrial Heritage section of the document that would have a significant impact on climate change. The Sellafield visitors centre could include educational installations and displays to educate people about renewable and low carbon technologies, thereby promoting them but this level of detail is not available as yet and therefore no assessment can be made.
4	Water Resources	-	Any additional development on any part of the site will have negative impact on water resources in Copeland. It will be important that any new

## Assessment of Option 1 – Industrial Heritage Zone

5	Flood Risk	-	<ul> <li>buildings on the site mitigate this impact by incorporating grey water technologies etc. to reduce the amount of drinking water used. There is some soil contamination on parts of the site and it will be important to reduce as much run-off as possible. Therefore it might be sensible to consider SUDs in any detailed proposal for a new building, depending on its exact location.</li> <li>This option suggests that there may be additional footpaths providing access to different parts of the site and potentially a new building to house a new Sellafield Visitor Centre with, presumably, a car park. Although there are no obvious areas at risk of flooding on the higher ground it might be sensible to include SuDs to stop additional water running down the cliff side and causing further instability in the made ground at the bottom.</li> </ul>
6	Energy	+	There is the suggestion of possible new build developments and one of the objectives for the SPD is that all new development should be sustainable. It is assumed therefore that all new development will be energy efficient.
7	Land Quality	++/~	This option includes the use of concrete roads on the Marchon site for recreation purposes i.e. cycle tracks and a BMX park. There are areas of contaminated land on the Marchon site that would be presumably be remediated where necessary. This isn't stated in section 6.3.1. It might be appropriate to do so for clarity (if this was the case). If the contamination is all contained beneath the concrete then there will be no need for remediation to take place and therefore there would be no significant impact on the site.
8	Air Quality	~	More cars driving to, from or through the site to visit the Haig museum or potential new Sellafield Centre would have a negative impact on the air quality at the site and beyond its boundaries. If good quality landscaping is provided in sufficient quantities, the extra planting should provide some mitigation. The development may also justify improvements to bus services etc. reducing reliance on cars overall. No significant negative impact is anticipated.
9	Waste & Recycling	-	A larger number of visitors to the site would have a negative effect on the amount of waste generated. It would be sensible to consider how waste could be collected for recycling.
10	Services & Facilities	+	This option includes improvements to access onto the site for the heritage assets in the area and use of the Marchon site for cycling and walking thereby creating a recreational facility that is within walking distance for the existing Woodhouse and Kells communities. This will also be a valued asset for the new community that will form within the South Whitehaven SPD area.
11	Health & Wellbeing	+	Creating an area that is easy to walk or cycle through, and creating additional interest by making the heritage assets more accessible will encourage local people to visit the site for recreational purposes, learning more about the history of this area and getting the health benefits of exercise in an outdoor, clean air environment.
12	Education & Skills	+	Improving access to these important heritage assets and potentially introducing a new Sellafield Visitor Centre will allow local residents/children and visitors to learn something of past industries and present and future solutions to the global energy supply problem.
13	Sustainable Economy	++	It is generally acknowledged that Whitehaven and West Cumbria in general is too dependent on the nuclear industry and any development of the tourism industry here is very positive.
14	Leisure & Tourism	++	All of the suggested developments in this option would be good for the tourism industry in Whitehaven. It would also give local people a valuable recreational resource on their doorstep.

15	Housing	~	No significant impact anticipated.
16	Retail	+	Additional tourism activity in the Whitehaven area will increase the viability and vitality of Whitehaven town centre.
17	Transport	+	Increasing the attractiveness of the site to pedestrians and cyclists travelling from Woodhouse and the new South Whitehaven housing development into Whitehaven town centre will reduce the dependency of these local communities on private transport. There may also be justification for improving the bus services in the area.

There are some potential negative effects outlined in the table above relating to biodiversity, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

## Suggested additional text for Section 6.3.1

A particularly high standard of architecture, construction and landscaping will be required for any new development in this area so that negative impacts on this very sensitive landscape are minimised. The building could also be an exemplar of sustainable construction incorporating grey water and energy efficient technologies, renewable energy generation, sustainable drainage and recycling facilities.

Access to Barrowmouth would be through part of the St Bees Head SSSI which is designated for its birdlife and geology. Care must be taken to ensure that damage from the additional access opportunities is minimised and that visitors are encouraged to stick to the footpaths in the most sensitive areas.

## **Option 2 – Wildlife and the Natural Environment Zone**

There are opportunities to introduce land management regimes on the fringes of the St Bees Head SSSI that will extend the wildlife interest into the more environmentally degraded areas of the site. A National Nature Reserve could be established on the former Marchon site. Trials with wild flower species have indicated that this might be a possibility. This option would require substantial investment, a long term vision and a management plan for the restoration and enhancement of the landscape. There would need to be enhanced access including high quality interpretation and education provision. The site would be landscaped to provide biodiversity corridors and link in with the new open space provided in South Whitehaven. This zone would be concentrated along the coastal fringe but would extend onto the Marchon site.

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	++	This option is the most beneficial for biodiversity as the site would be actively managed for wildlife.
2	Landscape & Conservation	++	This option would be beneficial for the landscape. There would be very little new build development involved.
3	Climate Change	+	Increasing the amount of planting on the site in order to create wildlife corridors will help the area to act as more of a carbon sink. Increasing the

			number of paths and cycle ways to provide access to the various
			interpretation and education features will help to make the site easier to
			move through for local cyclists and pedestrians thereby possibly reducing
			the amount of car travel through West Whitehaven.
4	Water	~/+	There is no suggestion of any new build development as part of this
	Resources		option apart from perhaps a new education facility. With additional
			planting and no greenfield development there should actually be less run-
			off from the site. There might be a minor positive impact. No significant
			impacts are anticipated.
5	Flood Risk	~/-	This option suggests that there may be additional footpaths providing
-		,	access to different parts of the site. There are no obvious areas at risk of
			flooding on the higher ground it might be sensible to include SuDs to stop
			additional water running down the cliff side and causing further instability
			in the made ground at the bottom. With increased planting there should
			be less runoff overall so any negative impact ought to be mitigated. The
			drainage of the site would have to be carefully looked at for any of the
			options.
6	<b>Finance</b>	~	There will be little if any new development on the site under this option.
6	Energy		
-		1	Therefore no significant impact is anticipated.
7	Land Quality	++/~	There are areas of contaminated land on the Marchon site that would be
			presumably be remediated where possible and necessary. This isn't
			stated in section 6.3.2. It might be appropriate to do so for clarity (if this
			was the case). If the contamination is all contained beneath the concrete
			then there will be no need for remediation to take place and therefore
			there would be no significant impact on the site.
8	Air Quality	+	There may be some visitors driving to the site in cars. However, increased
			planting to provide wildlife corridors will more than mitigate this impact
			and overall the impact will probably be a positive one.
9	Waste &	-	A larger number of visitors to the site would have a negative effect on the
	Recycling		amount of waste generated. It would be sensible to consider how waste
			could be collected for recycling.
10	Services &	+	This option includes improvements to access onto the site for educational
	Facilities		and recreational purposes. This will be a valued asset for the existing
			communities in Kells and Woodhouse and also the new community that
			will form within the South Whitehaven SPD area.
11	Health &	+	Creating an area that is easy to walk or cycle through, and creating
	Wellbeing		additional interest by making the wildlife and geological assets more
	wendering		accessible will encourage local people to visit the site for recreational
			purposes, learning more about the natural history of this area and getting
			the health benefits of exercise in an outdoor, clean air environment.
12	Education &	+	Improving access to these important natural assets will allow local
12		т	residents/children and visitors to about their natural environment, the
	Skills		challenges facing some species and habitats today and more about the
10	Custoinable	<u> </u> .	possible solutions to these issues.
13	Sustainable	+	Improving this site in this way would draw in more visitors interested in
	Economy		the wildlife and geology of the Cumbrian coast. Therefore it would have a
			positive effect on the local economy and could create jobs in tourism and
			possibly retail as well.
14	Leisure &	++	The suggested improvements in this option would be good for the tourism
	Tourism		industry in Whitehaven. It would also give local people a valuable
			recreational resource on their doorstep.
15	Housing	~	No significant impact anticipated.
16	Retail	+	Additional tourism activity in the Whitehaven area will increase the
			viability and vitality of Whitehaven town centre and possibly reduce the
			number of vacant units.
17	Transport	+	Increasing the attractiveness of the site to pedestrians and cyclists

travelling from Woodhouse and the new South Whitehaven housing development into Whitehaven town centre will reduce the dependency of
these local communities on private transport.

This option is the most sustainable in terms of the environment. It is also sustainable for the economy in that the option focuses on two of the most important tourism attractions in the area i.e. landscape and wildlife.

## **Option 3 – Tourism and Leisure Zone**

The Core Strategy supports tourism development along the coastal fringe as long as it accords with the principles of sustainable development and does not spoil the landscape character or interfere with access to this valuable local resource. This option suggests that the site might be suitable for tourism/leisure type development including

- A golf course
- Adventure / BMX / Skate park
- Hotel and spa
- Fitness suite
- Restaurant
- A visitor interpretation centre for the Coastal Fringe and St Bees Heritage Coast

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	-/	Golf courses are generally very large areas of intensively managed grass and therefore their value to wildlife can be very limited. There are a number of BAP species on the site including birds, insects and reptiles. If a golf course were to go ahead a great deal of consideration would have to be given to its exact location and design so as to limit the amount of habitat fragmentation that could result. Wildlife corridors would have to be a key feature of the site.
2	Landscape & Conservation	+	Golf courses can be attractive features and such a development would retain the openness of the area which is very important both to the Council and the local communities. The document states that any new build development (hotel, restaurant, fitness suite etc.) will be confined to the brownfield part of the site, particularly the site of the former Tamar buildings. The buildings will be low rise, again to preserve the open character of the area. Buildings will be set in landscaped grounds.
3	Climate Change	~/+	All new development on the site will accord with the principles of sustainable development and meet acceptable standards in terms of energy efficiency. No significant positive impacts are anticipated.
4	Water Resources	-	Any additional development on any part of the site will have negative impact on water resources in Copeland. It will be important that any new buildings on the site mitigate this impact by incorporating grey water technologies etc. to reduce the amount of drinking water used. There is some soil contamination on parts of the site and it will be important to reduce as much run-off as possible. Therefore it might be sensible to consider SUDs in any detailed proposal new buildings, depending on its exact location.

		1	
5	Flood Risk	-	New buildings to house a hotel, fitness club etc. plus presumably, a car park are proposed under this option and this means that there could be a greater rate of rainwater runoff than there is currently. Although there are no obvious areas at risk of flooding on the higher ground it might be sensible to include SuDs to stop additional water running down the cliff side and causing further instability in the made ground at the bottom.
6	Energy	+	One of the objectives for the SPD is that all new development should be sustainable. It is assumed therefore that all new development will be energy efficient.
7	Land Quality	++/~	This option includes the use of concrete roads on the Marchon site for recreation purposes i.e. cycle tracks and a BMX park. There are areas of contaminated land on the Marchon site that would be presumably be remediated where necessary. This isn't stated in section 6.3.3. It might be appropriate to do so for clarity (if this was the case). If the contamination is all contained beneath the concrete then there will be no need for remediation to take place and therefore there would be no significant impact on the site.
8	Air Quality	~	More cars driving to, from or through the site would have a negative impact on the air quality at the site and beyond its boundaries. If good quality landscaping is provided in sufficient quantities, the extra planting should provide some mitigation. The development may also justify improvements to bus services etc. reducing reliance on cars overall. No significant negative impact is anticipated.
9	Waste & Recycling	-	A larger number of visitors to the site would have a negative effect on the amount of waste generated. It would be sensible to consider how waste could be collected for recycling.
10	Services & Facilities	+	This option would provide high quality facilities for visitors and local communities and businesses.
11	Health & Wellbeing	+	Creating an area that is easy to walk or cycle through will encourage local people to visit the site for recreational purposes. The fitness suite and spa clearly have benefits for health and wellbeing for those who can afford to use these services.
12	Education & Skills	+	Improving access to these important heritage assets and potentially introducing a new Interpretation Centre will allow local residents/children and visitors to learn something of past industries.
13	Sustainable Economy	++	These facilities will encourage more visitors to stay in the area and it could be argued that it may attract more businesses to the area. Therefore there may be positive impacts for the economy. The development would certainly provide welcome jobs.
14	Leisure & Tourism	++	All of the suggested developments in this option would be good for the tourism industry in Whitehaven. It would also give local people a valuable recreational resource on their doorstep.
15	Housing	~	No significant impact anticipated.
16	Retail	+	Additional tourism activity in the Whitehaven area will increase the viability and vitality of Whitehaven town centre.
17	Transport	+	Increasing the attractiveness of the site to pedestrians and cyclists travelling from Woodhouse and the new South Whitehaven housing development into Whitehaven town centre will reduce the dependency of these local communities on private transport.

There are some potential negative effects outlined in the table above relating to biodiversity, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

Golf courses are large areas of intensively managed grassland that are generally of very

*little value to wildlife. If this type of development were to go ahead, consideration should be given to preventing the fragmentation of habitats with the inclusion of an adequate number of wildlife corridors and stepping stones.* 

It will be important that new buildings are sustainably designed and constructed to meet high standards of energy and water efficiency. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new facilities.

## **Option 4 – Britain's Energy Coast Innovation Zone (Mixed Use Development)**

The Marchon site offers an opportunity for a small high-end business park mixed with some residential development to make the option financially viable. The business park would provide facilities for incubation units and early stage production and development linked to the nuclear engineering industry and other low carbon technologies. There are 3 different options as regards layout of the Innovation Zone:

- 1. Concentrate the buildings within a medium to high density environment on the footprint of the former Tamar buildings
- 2. Design the business park to be at a lower density, set within a landscaped park and incorporating extensive areas of planting across a larger footprint of the former Marchon site

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	-	Development will generally have a negative impact on biodiversity. It will be important to mitigate the impact with careful landscaping and the creation of wildlife corridors to prevent habitat areas from becoming fragmented. Of the three layout options it would seem appropriate to keep development to as small an area as possible so options 1 and 3 would seem more sustainable. However, Option 2 would present opportunities for habitat creation, if this was appropriate on this site. With any of the three options great care should be taken to prevent habitat fragmentation and enhance opportunities for biodiversity wherever possible.
2	Landscape & Conservation	-	This type of development on such an open site would have a negative impact on the landscape. Layout options 1 and 3 seem like better options because the development area will be much smaller, preserving as much of the landscape in its current state as possible. Option 2 would be the worst case scenario in terms of changing the character of the site.
3	Climate Change	++	The aim of the Innovation Zone would be to incubate new businesses, at least some of which should be involved in developing new renewable and low carbon energy technologies. If it is successful in doing this the impact on climate change will be significantly positive.
4	Water Resources	-	Any additional development on any part of the site will have negative impact on water resources in Copeland. It will be important that any new buildings on the site mitigate this impact by incorporating grey water technologies etc. to reduce the amount of drinking water used. There is some soil contamination on parts of the site and it will be important to

3. Consider the expansion and/or improvement of the Haig Enterprise Park.

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			reduce as much run-off as possible. Therefore it might be sensible to consider SUDs in any detailed proposal for new development, depending
			on its exact location.
5	Flood Risk	-	New buildings and presumably reasonably large areas of parking are proposed under this option and this means that there could be a greater rate of rainwater runoff than there is currently. Although there are no obvious areas at risk of flooding on the higher ground it might be sensible to include SuDs to stop additional water running down the cliff side and
			causing further instability in the made ground at the bottom.
6	Energy	+	One of the objectives of the SPD is that all new development should be sustainable. It is assumed therefore that all new development will be energy efficient.
7	Land Quality	++/~	There are areas of contaminated land on the Marchon site that would be
		,	presumably be remediated where necessary. This isn't stated in section
			6.3.4. It might be appropriate to do so for clarity (if this was the case). If the contamination is all contained beneath the concrete and this is to remain undisturbed, then there will be no need for remediation to take place and therefore there would be no significant impact on the site.
8	Air Quality	~	More cars driving to, from or through the site would have a negative
			impact on the air quality at the site and beyond its boundaries. If good quality landscaping is provided in sufficient quantities, the extra planting should provide some mitigation. The development may also justify
			improvements to bus services etc. reducing reliance on cars overall. No
9	Waste &		significant negative impact is anticipated. A larger number of residents on and visitors to the site would have a
9	Recycling	-	negative effect on the amount of waste generated. It would be sensible
	Recycling		to consider how waste could be collected for recycling.
10	Services &	+	This option would increase the number of jobs within easy walking
	Facilities		distance of one of the most deprived wards in Copeland and therefore would have a positive impact
11	Health &	+	Other than the generally positive impact that more employment
	Wellbeing		opportunities will have on the health and wellbeing of local people, no
			significant impacts are anticipated. Layout option 2 would take up a large
			part of the site that could otherwise be used for recreational purposes. Therefore it is felt that option 2 could arguably be the least sustainable of the 3 layout options.
12	Education &	++	Improving access to high quality job opportunities will have a positive
	Skills		impact on education and skills and schools and colleges respond to the
			demand of a growing number of local business for certain skills. This
			development option is seen as the most positive for this particular sustainability objective.
13	Sustainable	++	This option could bring high quality jobs to West Whitehaven and
	Economy		therefore have a very positive impact on the local economy.
14	Leisure &	~/-	This option will not attract tourists and visitors to the area. With regards
	Tourism		to layout option 2 there may actually be a negative impact on tourism and
			leisure as the suggested development could actually take up a large part
1 -	Housing	~/.	of the site that would otherwise be used for recreation and leisure.
15	Housing	~/+	Housing on this site would add to the offer in the Whitehaven area and in this respect have a positive impact. However, the development will only
			be considered to be sustainable if the development provides a mix of housing types and tenures to allow a mixed community to form. The
			housing types and tenures to allow a mixed community to form. The developers need to take into account the types of houses already present
			and those proposed for the South Whitehaven area so their contribution
			complements what is already in place. It might be useful for the SPD to
			provide a little detail as regards preferred housing types and tenures.
16	Retail	+	Additional economic activity in the West Whitehaven area will increase
		· · · · · · · · · · · · · · · · · · ·	

			the viability and vitality of Whitehaven town centre.
17	Transport	+	The provision of jobs close to where people live has the potential to reduce the dependency of local people on their cars. Developing significant numbers of dwellings and jobs in the area may justify the provision of extra public transport which again would reduce dependency
			on private transport.

There are some potential negative effects outlined in the table above relating to biodiversity, landscape, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

It will be important to mitigate the impact with careful landscaping and the creation of wildlife corridors to prevent habitat areas from becoming fragmented and enhance biodiversity wherever possible.

It will be important that new buildings are sustainably designed and constructed to meet high standards of energy and water efficiency. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new facilities.

It will be important to facilitate waste and recycling collection within the development. This may involve the provision of a community waste recycling bank close to the centre of the site. It may also be advantageous to provide an area within the curtilage of each dwelling/business premises etc. where waste bins, recycling boxes etc. can be stored in a convenient place for waste collection purposes.

## **Option 5 – Temporary Worker Accommodation**

The site is large and has reasonable road links meaning that it might be a good location for temporary construction worker accommodation for the nuclear new build project at Moorside. The document does not say what form this development would take (e.g. campus, dwellings, hotel etc.) so it is difficult to assess in terms of legacy. The table below assesses the principle of this type of development on the footprint of the former Marchon chemical works and office buildings.

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	-	Development will generally have a negative impact on biodiversity. It will be important to mitigate the impact with careful landscaping and the creation of wildlife corridors to prevent habitat areas from becoming fragmented.
2	Landscape & Conservation	-	This type and scale of development on such an open site would have a negative impact on the landscape. The development would have to be low rise and great care would have to be taken to provide high quality architecture and adequate landscaping. Even taking this level of mitigation into account the development would have a significant negative effect on the open character of the area.

3	Climate Change	+	One of the objectives of the SPD is that all development will meet acceptable standards in terms of energy efficiency.
4	Water Resources	-	Any additional development on any part of the site will have negative impact on water resources in Copeland. It will be important that any new buildings on the site mitigate this impact by incorporating grey water technologies etc. to reduce the amount of drinking water used. There is some soil contamination on parts of the site and it will be important to reduce as much run-off as possible. Therefore it might be sensible to consider SUDs in any detailed proposal for new development, depending on its exact location.
5	Flood Risk	-	New buildings and presumably reasonably large areas of parking are proposed under this option and this means that there could be a greater rate of rainwater runoff than there is currently. Although there are no obvious areas at risk of flooding on the higher ground it might be sensible to include SuDs to stop additional water running down the cliff side and causing further instability in the made ground at the bottom.
6	Energy	+	One of the objectives of the SPD is that all new development should be sustainable. It is assumed therefore that all new development will be energy efficient.
7	Land Quality	++	There are areas of contaminated land on the Marchon site that would be remediated where necessary
8	Air Quality	~	More cars driving to, from or through the area would have a negative impact on the air quality at the site and beyond its boundaries. If good quality landscaping is provided in sufficient quantities, the extra planting should provide some mitigation. The development may also justify improvements to bus services etc. reducing reliance on cars overall. No significant negative impact is anticipated.
9	Waste & Recycling	-	A larger number of residents on the site would have a negative effect on the amount of waste generated. It would be sensible to consider how waste could be collected for recycling.
10	Services & Facilities	-	A larger number of residents in the area could put a strain on essential services and facilities in the Whitehaven area. Careful consideration would have to be given to enhancing existing services to cope with the increased demand or the development of new facilities.
11	Health & Wellbeing	-	The development would take up a large part of the site that could otherwise be used for recreational purposes.
12	Education & Skills	~	No significant impact anticipated.
13	Sustainable Economy	+	A large number of temporary workers living in Whitehaven will give the town's evening and night time economies a boost and also help retail in the town centre.
14	Leisure & Tourism	~	This option will not attract tourists and visitors to the area. The Marchon is not currently a draw for tourists so there would be no negative impact but as an alternative to some of the other development options this is one of the least favourable for this sustainability objective.
15	Housing	~/-	The site would provide temporary accommodation for the construction workers but the impact on housing in the longer term would depend on the form of development and whether it could be attractive housing for local people at the end of the construction programme. If the development is poor quality it could actually have a negative impact on the housing development in the South Whitehaven SPD area. Some consideration will have to be given to what form the development takes and landscaping, legacy etc.
16	Retail	++	A large number of temporary workers living in Whitehaven will give the town centre retail a boost.

17	Transport	+	The site has good road links to the Moorside Site and development on this
			scale could justify enhanced bus services in the general area

There are some potential negative effects outlined in the table above relating to biodiversity, landscape, water resources, flood risk, services, health and waste. Adding the text suggested below may help to make the document more sustainable.

A particularly high standard of architecture, construction and landscaping will be required for any new development in this area so that negative impacts on this very sensitive landscape are minimised. The buildings could also be an exemplar of sustainable construction incorporating grey water and energy efficient technologies, renewable energy generation, sustainable drainage and recycling facilities.

It will be important to mitigate the impact on biodiversity with the creation of wildlife corridors to prevent habitat areas from becoming fragmented. Opportunities to enhance biodiversity should be taken wherever possible. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new development.

Careful consideration should be given to the possibility for increased pressure on existing essential services i.e. medical centres etc. The services may need to be enhanced temporarily to deal with extra demand.

## **Option 6 – Renewable Energy**

The SPD rules out large scale wind energy as it would change the character of the landscape too much and have a significant negative effect on the biodiversity of the area, local communities and views to and from the St Bees Heritage Coast. Any such development would undoubtedly meet a lot of local opposition.

Instead the SPD aims to concentrate on non-wind related forms of low carbon energy generation that are less likely to have an unacceptably negative impact on this highly sensitive landscape. Section 6.3.6 suggests that the area has potential for using the 'hot rocks' beneath the surface in Cumbria for district heating systems, possibly in both the West and South Whitehaven SPD areas.

As this development option depends on the other options, the principle of heat and energy generation from 'hot rocks' has not been assessed. The SPD does not provide details of how the technology works but the principle of 'hot rocks' is sustainable as it clearly does not rely on fossil fuels.

## **Option 7 – Local Centre Zone**

The SPD describes the Local Centre as including a small supermarket, medical centre, newsagents and a small selection of other local shops. The accompanying map for section 6.3.7 shows this zone on the site of the former Marchon office buildings. The SPD states that the 2009 Retail Study did not identify any need for growth in retail in the Whitehaven area but rather says that the Council should merely try to maintain a level of retail and service provision in the various centres. There will be a major new housing development in the South Whitehaven SPD area and the document suggests that this option might be better delivered as part of that development. However, the option is assessed below.

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	-	Development will generally have a negative impact on biodiversity. It will be important to mitigate the impact with careful landscaping and the creation of wildlife corridors to prevent habitat areas from becoming fragmented.
2	Landscape & Conservation	-	The site is very open and has a character that is valued by local communities. Residents on the opposite side of the road to the suggested location are used to seeing large buildings on this site so the impact from their perspective may be minimal. Local residents have already commented on the increased exposure to the wind since the Tamar buildings were demolished. In order to mitigate any negative effects on the landscape, the development would have to be low rise and great care should be taken to provide high quality architecture and landscaping.
3	Climate Change	+	One of the objectives of the SPD is that all development will meet acceptable standards in terms of energy efficiency. The local centre would provide essential services and facilities within walking distance of a large residential area so there would a positive impact in that this option would reduce dependence on cars for use of these services.
4	Water Resources	-	Any additional development on any part of the site will have negative impact on water resources in Copeland. It will be important that any new buildings on the site mitigate this impact by incorporating grey water technologies etc. to reduce the amount of drinking water used. There is some soil contamination on parts of the site and it will be important to reduce as much run-off as possible. Therefore it might be sensible to consider SUDs in any detailed proposal for new development, depending on its exact location.
5	Flood Risk	-	New buildings and presumably reasonably large areas of parking are proposed under this option and this means that there could be a greater rate of rainwater runoff than there is currently. Although there are no obvious areas at risk of flooding on the higher ground it might be sensible to include SuDs to stop additional water running down the cliff side and causing further instability in the made ground at the bottom.
6	Energy	+	One of the objectives of the SPD is that all new development should be sustainable. It is assumed therefore that all new development will be energy efficient.
7	Land Quality	~	There are some questions as to how viable this type of development will be. With this in mind there would be some doubt as to whether finances would allow for land remediation. If they are not then it no significant impact is anticipated.
8	Air Quality	~	More cars driving to, from or through the site would have a negative impact on the air quality at the site and beyond its boundaries. If good quality landscaping is provided in sufficient quantities, the extra planting

			should provide some mitigation. The development may also justify improvements to bus services etc. reducing reliance on cars overall. No significant negative impact is anticipated.
9	Waste & Recycling	-	This type of development would have a negative effect on the amount of waste generated. It would be sensible to consider how waste could be collected for recycling.
10	Services & Facilities	+	This option would provide a small range of essential services within walking distance of Wood South and West Whitehaven areas
11	Health & Wellbeing	+	The development would provide a medical centre within walking distance of a large number of dwellings.
12	Education & Skills	~	No significant impact anticipated.
13	Sustainable Economy	+	Additional retail may have a negative impact on existing retail in the Whitehaven area. The additional dwellings in the South Whitehaven area should mitigate this but it will depend on what the new retail offer is. It will be important that it complements existing retail and does not enter into direct competition. The development will create jobs in the area.
14	Leisure & Tourism	+	This option would create facilities for tourists in the area as well as residents.
15	Housing	~	No significant impact anticipated.
16	Retail	-	There is a danger that additional retail in this location could damage retail elsewhere. It will be important that the new retail 'offer' complements existing retail and does not enter into direct competition. The SPD points out that this type of development may not be viable at the moment.
17	Transport	+	Essential services on this site may justify an improved bus service in this part of Whitehaven

There are some potential negative effects outlined in the table above relating to biodiversity, landscape, water resources, flooding and waste. Adding the text suggested below may help to make the document more sustainable.

A particularly high standard of architecture, construction and landscaping will be required for any new, preferably low-rise, development in this area so that negative impacts on this very sensitive landscape are minimised.

It will be important to mitigate the impact on biodiversity with the creation of wildlife corridors to prevent habitat areas from becoming fragmented. Opportunities to enhance biodiversity should be taken wherever possible. There is also an opportunity for SUDs ponds to be introduced on this site, bringing benefits for biodiversity and providing effective surface water drainage for the new development.

The document highlights problems with the financial viability of such a development. It might not be appropriate for the developers to be asked to build to a particularly high standard of sustainable construction if this would be prohibitively expensive.