

For and on behalf of
Copeland Borough Council

Employment Land Availability Study

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

August 2021

Prepared by:	Kirsten Ward BSc (Hons) MA PhD MRTPI Associate Planner
Checked by:	Alex Roberts BSc (Joint Hons) AssocRTPI Director
Approved by:	Alex Roberts BSc (Joint Hons) AssocRTPI Director
Date: August 2021	Office: Sheffield

Strategic Planning Research Unit

V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY

Tel: 01142 289190

Broad Quay House (6th Floor)
Prince Street
Bristol
BS1 4DJ

Tel: 01179 058850

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832740

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0.0 EXECUTIVE SUMMARY

- 0.1 DLP Planning has been instructed by Copeland Borough Council to undertake an independent assessment of existing and potential employment land across the borough. The findings of this Employment Land Availability Study (ELAS) are presented in this report and the accompanying appendices, which include the overview map showing site locations (Appendix 1) and the detailed site assessment proformas (Appendices 2 to 4).
- 0.2 The purpose of this ELAS is to provide an assessment of employment land (use classes E (business), B2 and B8) as set out in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 to identify a suitable, available and achievable supply of land for economic development that can inform the development of the Copeland Local Plan (2021-2038).
- 0.3 A total of 67 sites were assessed through the ELAS, identified from a variety of sources, including:
- Draft employment sites (identified in Draft Policy E3PO and E4PO of the Preferred Options Local Plan, the majority of which are in existing employment use)
 - Draft opportunity sites and areas (identified in Draft Policy E5PO and Appendix G of the Preferred Options Local Plan)
 - Other potential employment and opportunity sites identified by the Council and through the Call for Sites process as being potentially suitable and available for employment use
- 0.4 The site assessment process involved a series of stages including landowner identification and contact (in order to confirm site details and availability), desk-based assessment and site visits (undertaken in May 2021). Each site was assessed against a series of criteria with responses recorded in a proforma detailing site specific characteristics. The final section on each proforma summarises the suitability, availability and deliverability of each site and provides a recommendation on whether the site could potentially be allocated for employment use. These recommendations for potential site allocation are subject to the application of sustainability appraisal and site selection criteria, and will be dependent upon the economic development needs identified in the EDNA.
- 0.5 Of the 67 sites assessed, 17 are considered to be potentially suitable for allocation as listed in the table below. There is a total of 39.31ha of deliverable (suitable, available and achievable) employment land in Copeland. For sites which would be preferable or suitable only for Class E uses there is a total of 0.82ha. Land at Westlakes Science Park, Land Adjacent to Moor Row and Westlakes, and Land Adjacent to Scalegill are identified as suitable only for Class E or Class B2 uses (16.07ha). The remaining sites (22.42ha) are identified as being suitable for all employment use classes.

Site Ref.	Site Name	Settlement	Total Site Area (ha)	Developable Area (approx. ha)	Potential Use Classes
E2	Whitehaven Commercial Park	Whitehaven	12.39	1.80	All use classes
WEOS5	Land at Ginns	Whitehaven	2.99	2.41	All use classes
WT021	Cockpit	Whitehaven	0.24	0.24	All use classes
WTC2 & WT013	Former Mark House	Whitehaven	0.25	0.25	Class E Only
WTC4	Former Bus Depot and Garage	Whitehaven	0.18	0.18	Class E Only
WH021	Red Lonning	Whitehaven	0.58	0.20	All use classes
WEOS1	Old Dawnfresh Factory Site	Whitehaven	1.24	0.65	All use classes
WT020	Pow Beck	Whitehaven	12.02	4.50	All use classes
E9	Bridge End	Egremont	12.59	2.83	All use classes
EEOS1	Land at Chapel Street	Egremont	0.83	0.40	Class E Only
ELA7	East Road Garage	Egremont	0.62	0.62	All use classes
E6	Leconfield Industrial Estate	Cleator Moor	14.39	6.07	All use classes
CL005	Cleator Mills	Cleator	9.88	2.21	All use classes
ELA2	Furnace Row	Distington	3.17	0.89	All use classes
E1	Westlakes Science Park	Moor Row	51.50	6.37	Classes E and B2 Only
MO013	Land Adjacent Moor Row and Westlakes	Moor Row	2.70	2.70	Classes E and B2 Only
MO030	Land Adjacent to Scalegill	Moor Row	7.00	7.00	Classes E and B2 Only
Total Developable Employment Land (Ha)				39.31	
Class E only				0.82	
Class E / B2 only				16.07	
All use employment classes				22.42	

- 0.6 Should the highest growth scenario identified in the EDNA be taken by the Council, there is an overall shortfall of potential employment land within Copeland Borough of approximately 0.59ha. If only a selection, or none of the growth scenario components form part of the Local Plan, the shortfall could decrease or no longer exist.
- 0.7 Assuming the Council do wish to take the highest growth scenario then more land for employment uses is required. The key areas for more employment growth, based on the stakeholder feedback and market analysis would be at settlements and locations in the north of the Borough, along, or within easy access of the A595 (Whitehaven, Egremont and Cleator Moor).
- 0.8 The additional 16.07ha within or adjoining Westlakes Science Park should satisfy that specific market demand and will contribute to the overall employment land requirements.
- 0.9 The recommended next steps for taking forward the findings of this ELAS are as follows:
- Take forward the potential employment sites, through any further assessment / Sustainability Appraisal process to determine their suitability for employment land allocation;
 - Review employment policies;
 - Identify Westlakes Science Park within the settlement hierarchy with particular reference to meeting employment need;
 - Re-engage with sites identified as unsuitable solely on availability, to seek to identify these as suitable, available and achievable employment land; and
 - Consider the potential to safeguard employment land for use beyond the Local Plan period around Westlakes Science Park and Cleator Moor as these are key locations identified through stakeholder engagement and are likely to continue to play an important role beyond the plan period.

1.0 INTRODUCTION

1.1 DLP Planning has been instructed by Copeland Borough Council to undertake an independent assessment of existing and potential employment land across the borough. The findings of this Employment Land Availability Study (ELAS) are presented in this report and the accompanying appendices, which include the overview map showing site locations (Appendix 1) and the detailed site assessment proformas (Appendices 2 to 4).

a) Local Policy Context

1.2 Prior to this study being undertaken, the Council's most recent assessment of employment land was set out in the Employment and Opportunity Sites (September 2020) report that was prepared for the Preferred Options Local Plan consultation. This report provided a provisional assessment of employment sites and opportunity areas which may potentially be included in the Copeland Local Plan (2021-2038). It is understood that these sites were collated from a number of sources including:

- Copeland Local Plan and Development Policies DPD (2013-2028)
- Copeland Local Plan (2001-2016) Saved Policies
- Local Plan Preferred Options (2015)
- Non-residential Call for Sites (2020)

1.3 The Employment and Opportunity Sites report provided a useful preliminary assessment of these identified sites, including their size, constraints, suitability, availability and current development status. The initial assessment of sites undertaken in this report formed the starting point for this ELAS.

1.4 The Local Plan Preferred Options identifies 12 proposed employment allocations. These are set out in Draft Policies E3PO (Westlakes Science and Technology Park) and E4PO (Employment Sites and Allocations). The latter of these identifies 11 sites for B1, B2 and B8 uses which have been set out within a hierarchy ranging from the largest Strategic Employment Sites, through to large Major Employment Sites, and smaller Local Employment Sites. The majority of these allocations are existing employment sites or represent extensions to existing employment sites, with the exception of the Hensingham Common Strategic Employment Site in Whitehaven which would be a new employment site.

1.5 Appendix G of the Local Plan Preferred Options also identified a number of 'Opportunity Sites' which were proposed in Draft Policy E5PO as being a focus for 'inward investment and regeneration', including employment uses.

b) National Policy Context

1.6 In terms of the national policy context, NPPF (2021) paragraph 82(d) highlights the need for plans to be flexible enough to accommodate needs not anticipated in the plan and allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. NPPF paragraphs 119 and 120(c) promote the effective use of land, and policies should give substantial weight to the value of using suitable brownfield land for identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. It is therefore important that the Local Plan identifies sufficient suitable and deliverable employment land to meet the needs of the Borough throughout the plan period (as will be determined by the findings of the Economic Development Needs Assessment (EDNA) that is being undertaken alongside the ELAS).

1.7 In undertaking employment land availability assessments, National Planning Practice Guidance (NPPG) sets out a recommended approach in paragraphs 001 (ref. 3-001-20190722) to 022 (ref. 3-022-20190722). NPPG recommends that plan-makers "assess a range of different site sizes from small-scale sites to opportunities for large-scale

developments” including “economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above” (NPPG paragraph 009, Reference ID: 3-009-20190722). The NPPG also sets out factors that should be considered when assessing the suitability, availability and achievability of sites for development for housing, economic and other uses (NPPG paragraphs 018, 019 and 020). These factors formed the basis of the site assessments undertaken in this ELAS (see Section 2 of this report) in order that this forms a robust evidence base document that conforms to national policy and guidance.

- 1.8 In undertaking the ELAS, it has also been necessary to take account of the new Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 in which the previously defined B1 uses (offices, research and development, light industrial processes) are now largely subsumed within the new Use Class E (commercial, business and service). Industrial uses (Class B2) and storage and distribution (Class B8) remain largely unaltered, with the exception of B2 industrial uses that can be carried out in a residential area without detriment to the amenity of that area, which now also fall within the new Class E(g). The recommendations set out in this ELAS on the suitability of sites for employment uses are based on this amended Use Classes Order.

c) Purpose of this Assessment

- 1.9 The overarching aim of this ELAS is to provide the Council with an assessment of employment land (Use Classes E (business), B2 and B8, as amended and updated in the new Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) to identify a future supply of land for economic development that is suitable, available and achievable to support the projected needs for the plan period to 2038
- 1.10 This ELAS presents a robust evidence base document that is in conformity with national policy requirements, the findings of which can be used to inform the Publication Draft and final stages of production of the Copeland Local Plan (2021-2038).

d) Structure of this Report

- 1.11 The remainder of this report is structured as follows:
- **Section 2** sets out the methodology that was used and presents a summary of the site assessments, including recommendations on whether sites are considered suitable for employment land allocation.
 - **Section 3** presents an analysis of employment land supply in the context of the findings of the Economic Development Needs Assessment (DLP Planning, May 2021) that has been undertaken alongside this Employment Land Availability Study.
 - **Section 4** sets out the recommended next steps for using the findings of this study to inform the policies within the emerging Local Plan.

2.0 SITE ASSESSMENTS

2.1 This section sets out the methodology and approach to undertaking the identification and assessment of sites. It also presents a summary of the findings from the individual site assessments. The detailed site assessment proformas are contained in Appendices 2 to 4.

a) Methodology

2.2 A total of 67 sites were assessed through the ELAS. These sites were identified from a variety of sources, including:

- Draft employment sites (identified in Draft Policy E3PO and E4PO of the Preferred Options Local Plan, the majority of which are in existing employment use)
- Draft opportunity sites and areas (identified in Draft Policy E5PO and Appendix G of the Preferred Options Local Plan)
- Other potential employment and opportunity sites identified by the Council and through the Call for Sites process as being potentially suitable and available for employment use

2.3 An overview map showing the locations of all sites assessed can be found in Appendix 1. The majority of the sites are located in the north of the borough, with clusters around Whitehaven, Egremont and along the A595 corridor. In the south of the borough there are a number of sites located in and around Haverigg and Millom.

2.4 The assessment process involved three stages:

i) **Landowner identification and contact**

2.5 Where possible, the Council identified the site landowners using information submitted via Call for Sites and existing available Land Registry records. Where a landowner or landowners were identified, a letter was sent from the Council requesting confirmation of the site's availability for employment allocation and whether they were amenable to follow-up contact from DLP Planning.

2.6 Questionnaires were then issued to landowners that confirmed their sites were available requesting further details, including details of active uses and current site occupiers, current site availability and marketing, recent development activity and planning permissions, ownership, availability and any identified constraints / viability issues. A total of 23 questionnaires were issued to landowners and 20 responses were received.

ii) **Desk-based assessment**

2.7 A desk-based assessment of each site was undertaken. A set of characteristics was agreed with the Council prior to the assessment which were examined and recorded in the assessment. This was based on a range of assessment criteria including:

- Current site uses and occupiers;
- Site suitability considerations and constraints, including relevant planning policy considerations, environmental designations, landscape character etc.; and
- Strategic planning considerations, including regeneration plans, existing and proposed allocations, alignment with strategic objectives etc.

2.8 In addition to these the assessment also considered the following factors which were used (alongside the landowner questionnaire responses) to determine likelihood of the site coming forward for employment uses:

- Has the site been formally identified for employment for at least 10 years?
- Has there been any recent development activity, within the last 5 years? This could

include works on site but also new or revised planning applications/building regulations applications.

- Is the site being actively marketed as an employment site?
- Is the site owned by a developer or another agency known to undertake employment development?
- Is the site in multiple ownership/occupation, or owned by an organisation unlikely to bring it forward for development?
- Is there a valid permission for employment development, likely to meet market requirements? Or for an alternative use?
- Are there any barriers to development coming forward? E.g. access, infrastructure requirements, neighbouring uses?
- Would employment development on this site be viable, without public funding to resolve infrastructure or other on-site constraints?

iii) **Site visits**

- 2.9 The desktop assessment was augmented by physical site surveys of the employment sites under consideration. These site visits took place on 19th – 20th and 29th – 30th May 2021. These site visits enabled us to affirm specific site characteristics such as active use and vacancy, quality, surrounding uses, access, parking and location. For existing sites, these site visits assessed whether the site remains fit for purpose to support employment uses and whether there is any opportunity for intensification or expansion. For proposed and opportunity sites, the visits considered the commercial attractiveness and deliverability of the site and any potential barriers to delivery.

b) **Site Assessment Summary**

- 2.10 All site information gathered during stages (i) to (iii) above is recorded on site proformas agreed with the Council. The proformas provide a comprehensive record of each site, including site photographs and site plan, and justify the suitability of each site for potential future allocation. The final section on each proforma summarises the suitability, availability and deliverability of each site and provides a recommendation on whether the site could be developed to deliver new employment floorspace. These recommendations can be used to inform site allocations within the Local Plan subject to the application of sustainability appraisal and site selection criteria, and will be dependent upon the economic development needs identified in the EDNA.
- 2.11 The following tables summarise the key findings and recommendations for each site. The completed proformas are contained in Appendices 2 to 4.
- 2.12 Rows highlighted in green are sites that are identified as suitable, available and achievable for new employment development (Classes E, B2 and B8). Rows highlighted orange are sites identified as suitable, available and achievable for only certain employment uses, as specified in the table. Town Centre sites identified as suitable for Class E employment use may still come forward as windfall sites even if not allocated as employment sites within the Plan.

i) Draft Employment Sites Summary (see Appendix 2 for completed proformas)

Site Ref.	Site Name	Settlement	Area (ha)	Is this an existing employment site?	Is the site suitable for employment use?	Is the site confirmed as being available for employment use?	Is the site likely to be deliverable within the plan period?	Is the site suitable, available and achievable for new economic development over the plan period?
E1	Westlakes Science Park	Moor Row	51.5	Yes	Yes	Yes	Yes	Yes – Undeveloped parts of site suitable for Classes E and B2 only
E2	Whitehaven Commercial Park	Whitehaven	12.39	Yes	Yes	Partly available	Uncertain	Yes - only undeveloped parts of site confirmed as available
E3	Haig Business Park	Whitehaven	2.61	Yes	Yes - southern part excluding car park in north of site	No	Uncertain	No – undeveloped parts of site not confirmed as available
E4	Sneckyeat Road	Whitehaven	4.91	Yes	Yes	No	Uncertain	No – undeveloped parts of site not confirmed as available
E6	Leconfield Industrial Estate	Cleator Moor	14.39	Yes	Yes	Yes	Yes	Yes - only undeveloped parts of site confirmed as available
E9	Bridge End	Egremont	12.59	Yes	Yes - subject to consideration of new development on landscape character	Partly available	Yes	Yes - only undeveloped parts of site confirmed as available
E12	Mainsgate Road	Millom	3.45	Yes	Yes - subject to consideration of flood risk, highways and ecological impacts	No	Uncertain	No – undeveloped parts of site not confirmed as available
E13	Devonshire Road	Millom	5.89	Yes	Yes - subject to consideration of highways and ecological impacts	No	Uncertain	No – undeveloped parts of site not confirmed as available
E17	Frizington Road	Frizington	1.56	Yes	Yes - subject to consideration of highways impacts	No	Uncertain	No – undeveloped parts of site not confirmed as available
E21	Seascale Rural Workshops	Seascale	1.41	Yes	Yes	No	Uncertain	No – undeveloped parts of site not confirmed as available
ELA1	Hensingham Common	Whitehaven	33.03	No	Yes - subject to consideration of landscape and highways impacts	No	Uncertain - may be dependent on delivery of Whitehaven Eastern Relief Road	No - site is not confirmed as available

ELA2	Furnace Row	Distington	3.17	Yes (partly)	Yes - western parts of the site only	Yes - western part only	Yes - western part only	Yes - western part only
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ii) **Draft Opportunity Sites and Areas Summary (see Appendix 3 for completed proformas)**

Site Ref.	Site Name	Settlement	Area (ha)	Is this an existing employment site?	Is the site suitable for employment use?	Is the site confirmed as being available for employment use?	Is the site likely to be deliverable within the plan period?	Is the site suitable, available and achievable for new economic development over the plan period?
CL005	Cleator Mills	Cleator	9.88	No	Yes- subject to consideration of potential landscape and heritage impacts	Partly available	Yes - part of site that is available	Yes - only parts confirmed as being available
EEOS1	Land at Chapel Street	Egremont	0.83	Yes (partly)	Yes - Class E	Yes – western part only	Yes	Yes – western part for Class E only due to town centre location
EG054	Chapel Street Car Park	Egremont	0.40	No	Yes - Class E	Yes	Yes	Yes - Class E only due to town centre location
EG064	Former Council Depot, Chapel Street	Egremont	0.26	Yes	Yes – Class E	No	Yes	No – site is not confirmed as available
EG067	Former Red Lion PH, Main Street	Egremont	0.02	No	Yes - Class E	No	Uncertain	No - site is not confirmed as available
WEOS1	Old Dawnfresh Factory Site	Whitehaven	1.24	No	Yes	Yes – eastern part only	Yes	Yes – eastern part only
WEOS2	Jacksons Timber	Whitehaven	0.47	Yes	Yes - subject to consideration of access arrangements	No	Uncertain	No - site is not confirmed as available
WEOS3	Preston St Garage	Whitehaven	0.45	Yes	Yes	No	Uncertain	No - site is not confirmed as available
WEOS4	BT Depot, Preston Street	Whitehaven	0.93	Yes	Yes	No	Uncertain	No - site is not confirmed as available
WEOS5	Land at Ginns	Whitehaven	2.99	No	Yes - subject to consideration of amenity impacts	Yes - western part only	Yes - western part only	Yes - western part only
WEOS6	Land at Coach Road	Whitehaven	0.63	Yes	Yes - subject to consideration of amenity impacts	No	Uncertain	No - site is not confirmed as available
WP005	Meadow View, Coach Road	Whitehaven	5.70	No	Yes - subject to consideration of access and flood risk	No	Uncertain	No - site is not confirmed as available

Site Ref.	Site Name	Settlement	Area (ha)	Is this an existing employment site?	Is the site suitable for employment use?	Is the site confirmed as being available for employment use?	Is the site likely to be deliverable within the plan period?	Is the site suitable, available and achievable for new economic development over the plan period?
WT019	Marlborough Street	Whitehaven	0.08	Yes (partly)	Yes - Class E	No	Uncertain	No - site is not confirmed as available
WT020	Pow Beck	Whitehaven	12.02	Yes (partly)	Yes - subject to consideration of access (northern part of site) and flood risk	Yes – part of site owned by Council (approx. 4.5ha)	Yes – part of site owned by Council (approx. 4.5ha)	Yes – part of site owned by Council (approx. 4.5ha)
WT021	Cockpit	Whitehaven	0.24	No	Yes - subject to consideration of amenity impacts	Yes	Yes	Yes
WT030	Quay Street Car Park (North)	Whitehaven	0.15	No	Yes - Class E	No	Uncertain	No - site is not confirmed as available
WTC1	Quay Street Car Park (South)	Whitehaven	0.35	No	Yes - Class E	No	Uncertain	No - site is not confirmed as available
WTC2 & WT013	Former Mark House	Whitehaven	0.25	No	Yes - Class E	Yes	Yes	Yes - Class E only due to town centre location
WTC4	Former Bus Depot and Garage	Whitehaven	0.18	No	Yes - Class E	Yes	Yes	Yes - Class E only due to town centre location

iii) Other Potential Employment and Opportunity Sites Summary (see Appendix 4 for completed proformas)

Site Ref.	Site Name	Settlement	Area (ha)	Is this an existing employment site?	Is the site suitable for employment use?	Is the site confirmed as being available for employment use?	Is the site likely to be deliverable within the plan period?	Is the site suitable, available and achievable for new economic development over the plan period?
BE013	Land adjacent Glenholme	Beckermest	1.62	No	No	No	No	No - site is neither suitable nor available
BE019/A	Land West of Holm Forge	Beckermest	6.05	No	No	No	No	No - site is neither suitable nor available
BE025	Beckermest Extension to Energy Coast Business Park	Beckermest	1.08	No	No	No	Uncertain	No - site is neither suitable nor available
BE026	Beckermest Extension to Energy Coast Business Park (2)	Beckermest	1.65	No	No	No	Uncertain	No - site is neither suitable nor available
BI012	Land to the west of A595 Springfield Farm	Bigrigg	3.16	No	No	No	No	No - site is neither suitable nor confirmed as available
BI019	Land to rear (south west) Village Hall	Bigrigg	1.52	No	Yes - subject to consideration of access and replacement open space	No	Uncertain	No - site is not confirmed as available
CM086 (E7) and E7a	Leconfield Extension	Cleator Moor	7.73	No	Yes – subject to consideration of access and flood risk impacts	No	No	No - site is not confirmed as available
DI031	Rear of Central Garage	Distington	1.38	No	No	Yes	No	No - site is not suitable
E6a	Leconfield Industrial Estate Extension (East)	Cleator Moor	5.54	No	Yes - Class E (offices)	No	Uncertain	No - site is not confirmed as available
EG056	Begargill Quarry North	Egremont	11.97	No	No	No	No	No - site is neither suitable nor available
EG057	Begargill Quarry South	Egremont	12.48	No	No	Yes - western part only	No	No - site is not suitable
EG066	Land at Florence Mine	Egremont	2.78	No	No	Yes - western part only	No	No - site is not suitable
ELA3	Red Lonning Industrial Estate	Whitehaven	1.42	Yes	Yes	No	Uncertain	No - site is not confirmed as available

Site Ref.	Site Name	Settlement	Area (ha)	Is this an existing employment site?	Is the site suitable for employment use?	Is the site confirmed as being available for employment use?	Is the site likely to be deliverable within the plan period?	Is the site suitable, available and achievable for new economic development over the plan period?
ELA4	Beckermert Industrial Estate	Beckermert	7.58	Yes	Yes	No	Uncertain	No - site is not confirmed as available
ELA5	Haverigg Industrial Estate	Haverigg	2.67	Yes	Yes - subject to consideration of flood risk	No	Uncertain	No - site is not confirmed as available
ELA6	North of Former Marchon	Whitehaven	19.86	No	Yes - subject to consideration of landscape and amenity impacts	No	Uncertain	No - site is not confirmed as available
ELA7	East Road Garage	Egremont	0.62	Yes	Yes - subject to consideration of access arrangements	Yes	Yes	Yes
ELA8	Old Prospect Works	Distington	2.09	Yes	Yes	No	Uncertain	No - site is not confirmed as available
ELA9	Chapel Row Goods Yard	Rowrah	1.50	Yes	Yes	No	Uncertain	No - site is not confirmed as available
ELA10	Whitehaven AD Sites	Whitehaven	73.49	No	No	No	No	No - site is neither suitable nor available
HA005	Land east of Moor Moss Lane	Haverigg	7.64	No	No	No	No	No - site is neither suitable nor available
KI009	Kirkland House Farm	Kirkland	1.53	No	No	Yes	No	No - site is not suitable
MI029	Foundry Road Garage, King Street	Millom	0.77	Yes	No	No	No	No - site is not suitable for further development
MI039	Mainsgate Road	Millom	3.24	Yes (partly)	Yes - Class E, subject to consideration of flood risk	No	Uncertain	No - site is not confirmed as available
MI042	Millom Pier	Millom	3.10	No	Yes - subject to consideration of environmental designations and flood risk	No	Uncertain	No - site is not confirmed as available
MO013	Land Adjacent Moor Row and Westlakes	Moor Row	2.7	No	Yes – Classes E and B2 only, together with site MO030	Yes	Yes	Yes - site suitable for Classes E and B2 only
MO028	Land to Southwest of Summergrove	Moor Row	8.54	No	Yes - subject to consideration of access arrangements	No	No	No - site is not available for employment use
MO029	Scalegill Hall Farm	Moor Row	1.52	No	No	No	No	No - site is neither suitable nor available
MO030	Land Adjacent to Scalegill	Moor Row	7	No	Yes – Classes E and B2 only, together with site MO013	Yes	Yes	Yes – site suitable for Classes E and B2 only

Site Ref.	Site Name	Settlement	Area (ha)	Is this an existing employment site?	Is the site suitable for employment use?	Is the site confirmed as being available for employment use?	Is the site likely to be deliverable within the plan period?	Is the site suitable, available and achievable for new economic development over the plan period?
SE027	Land adjacent Seascale Workshop	Seascale	2.74	No	Yes	No	Uncertain	No - site is not confirmed as available
SE029	Land at Yottenfews, north of CNC Dog training facility (Sellafield)	Sellafield	1.57	No	No	Yes	Yes	No – site is not suitable
TO001	Land North of Cop Lane	Thornhill	7.43	No	No	Yes	No	No - site is not suitable
WE013	Moresby Parks Road	Whitehaven	0.60	No	Yes	No	Uncertain	No - site is not confirmed as available
WE032	Land at West Cumberland Hospital & Snekyeat Road	Whitehaven	4.28	No	No	No	No	No - site is neither suitable nor available
WE041	Land off Snekyeat Road	Whitehaven	2.05	No	No	No	No	No - site is neither suitable nor available
WH021	Red Lonning	Whitehaven	0.58	Yes	Yes	Yes - eastern part only	Uncertain	Yes - eastern part only

3.0 EMPLOYMENT LAND SUPPLY AND DEMAND ANALYSIS

3.1 This section of the ELAS considers our findings on the supply of sites across the Borough against the employment land needs set out in the Economic Development Needs Assessment (EDNA). It will identify if there is a sufficient potential supply of employment land allocations to meet future needs and whether the potential allocations satisfy the qualitative demands on the market.

a) Summary of EDNA

3.2 The Economic Demand and Needs Assessment for Copeland Borough Council (2021) identifies the future employment needs across Copeland for the period covering 2021 to 2038. The EDNA identifies two total employment land needs, based on the Cambridge Econometrics and Experian forecasts and then identifies additional employment land needs through a growth scenario which is comprised of five separate elements.

3.3 In addition to the quantitative analysis, a range of stakeholder interviews have been undertaken as part of the EDNA process in order to provide a qualitative assessment of Copeland's economic and employment land needs.

i) Quantitative

3.4 The calculation of the total employment land need and the growth scenario is set out in detail within section 10 of the EDNA. Table 1 below summarises the employment land needs and growth scenario.

Table 1. Total Employment Land Needs (ha) – 2021-38

Employment Need	B1a/b	B1c/B2	B8	Total
CE	3.6	-5.9	3.7	1.5
Experian	2.7	5.2	4.1	12.0
Sellafield Off-Siting	3.2	1.9	0.1	5.2
Sellafield Supply Chain	2.5	3.2	5.3	11.0
Clean Energy Park*	0.9	3.7	2.9	7.5
Woodhouse Colliery	0.3	1.3	1.3	2.8
AI Campus	0.9	0.4	0.1	1.4
Growth Scenario Total	7.8	10.5	9.7	27.9

Source: Copeland Borough Council EDNA 2021

3.5 The figures set out in Table 1 above, include an allowance to update and replace existing stock and allow for a margin of flexibility.

3.6 The allowance to update and replace, is calculated by looking at the recent trend of losses of B Class employment land to alternative (non-B Class) uses and using this to forecast expected future losses of employment land.

3.7 The EDNA identifies that flexibility of supply is key in Copeland so that sufficient quanta and range of sites are available to support business growth and inward investment opportunities. Therefore, we have included a margin of flexibility equivalent to 5 years' worth of completions data.

ii) Qualitative

3.8 Section 6 of the EDNA sets out the qualitative demands on employment land in detail. In summary, the locational requirements of the market in Copeland are:

- a) Vast majority of the demand for new employment space is in the north of the borough and only a small level of demand in the south at Millom, which could be satisfied in Barrow if space is not available.
- b) Copeland's economic geography is focussed in the north-west of the borough, with the A595 corridor from Calderbridge northwards being considered the most attractive locations for commercial activity, and hence the locations in greatest demand for employment space. The most important factor affecting the commercial attractiveness of employment sites is proximity and access to the A595.
- c) Whitehaven, Cleator Moor, Westlakes Science and Technology Park and Sellafield were all identified as the main existing centres of employment in the borough.
- d) Whitehaven is the largest town centre in Copeland and the largest retail and leisure destination. It is also home to a significant quantum of office space and the focus of several regeneration projects. Albion Square has been the largest and most prominent office development in recent years which now provides accommodation for around 600-700 office workers, all of which has been taken up by Sellafield in support of their programme of off-siting.
- e) Cleator Moor was highlighted as a key employment location given its existing concentration of industrial uses and proximity to both Sellafield and Westlakes Science Park. However, the town is located further from the A595 than other settlements and road access via residential areas lessens its commercial attractiveness. Nonetheless, it remains one of the most attractive employment locations within Copeland, primarily because it has lower levels of rent than Westlakes Science and Technology Park. Leconfield Industrial Estate has recently been acquired by the Council and is being promoted as an energy business cluster location, stimulated by interest from businesses within this sector.
- f) Westlakes Science Park provides a very different employment offer to anything else in the borough, providing a premium business park focussed around high-end engineering firms strongly linked to the Sellafield supply chain. The park provides a very high quality environment and premises and is home to a significant number of national and international engineering companies. Occupancy rates are good, however there has been little in the way of recent development at the site although there remains scope for further expansion. However, this will most likely only be suitable for further expansion of similar high-end engineering and similar uses relating to Sellafield and related industries, and will not be suitable to support a wide range general employment uses.
- g) Respondents reported that currently there is a need for smaller industrial and workshop units across Copeland. There have been a number of examples in recent years of larger occupiers vacating large premises which are unable to be relet as a single space, but instead of subdivision into several smaller units, the units have been subject to change of use to a non-employment use instead and the employment use lost.
- h) It is currently difficult to find smaller workshop space in Copeland which caters for the smaller local business needs. There is currently an undersupply of industrial space and as a result businesses are looking towards Lillyhall to meet their requirements.
- i) Enquires for smaller industrial units are currently outstripping demand. Most in demand are small lock-up units with roller shutters and yardspace which provide

overnight parking. This includes demand from traditional industrial users such as manufacturing, and construction, but also creative arts and printing.

- j) There is also a lack of larger space for these companies to move into as they grow (beyond around 40-50 employees in size). Several examples were cited of businesses of this size having to move out of Copeland to Lillyhall in order to support their expansion requirements.
- k) For the office sector, respondents report that there is not an undersupply of office space as there is for industrial floorspace. The most significant factor affecting Copeland's office supply is the volume of take-up of office space by Sellafield Ltd. This process has been cited as a key dynamic for Copeland's office market in recent years. The majority of new office space coming onto the market, particularly that of any size, has been taken up by Sellafield.
- l) Conversely, in order to secure the most cost-effective use of public funds, Sellafield are required to find the most cost-effective solutions to meeting their accommodation requirements which means their priority is to look towards public estate property, then towards the rental market, and lastly towards commissioning new office space.

b) Suitable, available and achievable employment sites identified in the ELAS

- 3.9 This ELAS assessed 67 potential sites for new employment development, out of which 17 are considered to be suitable, available and achievable for delivering new employment development within the plan period. This includes sites that are currently undeveloped as well as existing employment sites where there is capacity for new employment development. These are listed in Table 2 below.
- 3.10 There is a total of 39.31ha of deliverable (suitable, available and achievable) employment land in Copeland. For sites which would be preferable or suitable only for Class E uses there is a total of 0.82ha. Land at Westlakes Science Park, Land Adjacent to Moor Row and Westlakes, and Land Adjacent to Scalegill are identified as suitable only for Class E or Class B2 uses (16.07ha). The remaining sites (22.42ha) are identified as being suitable for all employment use classes.

Table 2. Suitable, Available and Achievable Employment Sites

Site Ref.	Site Name	Settlement	Total Site Area (ha)	Developable Area (approx. ha)	Potential Use Classes
E2	Whitehaven Commercial Park	Whitehaven	12.39	1.80	All use classes
WEOS5	Land at Ginns	Whitehaven	2.99	2.41	All use classes
WT021	Cockpit	Whitehaven	0.24	0.24	All use classes
WTC2 & WT013	Former Mark House	Whitehaven	0.25	0.25	Class E Only
WTC4	Former Bus Depot and Garage	Whitehaven	0.18	0.18	Class E Only
WH021	Red Lonning	Whitehaven	0.58	0.20	All use classes
WEOS1	Old Dawnfresh Factory Site	Whitehaven	1.24	0.65	All use classes
WT020	Pow Beck	Whitehaven	12.02	4.50	All use classes
E9	Bridge End	Egremont	12.59	2.83	All use classes
EEOS1	Land at Chapel Street	Egremont	0.83	0.40	Class E Only
ELA7	East Road Garage	Egremont	0.62	0.62	All use classes
E6	Leconfield Industrial Estate	Cleator Moor	14.39	6.07	All use classes
CL005	Cleator Mills	Cleator	9.88	2.21	All use classes
ELA2	Furnace Row	Distington	3.17	0.89	All use classes
E1	Westlakes Science Park	Moor Row	51.50	6.37	Classes E and B2 Only
MO013	Land Adjacent Moor Row and Westlakes	Moor Row	2.70	2.70	Classes E and B2 Only
MO030	Land Adjacent to Scalegill	Moor Row	7.00	7.00	Classes E and B2 Only
Total Developable Employment Land (Ha)				39.31	
Class E only				0.82	
Class E / B2 only				16.07	
All use employment classes				22.42	

c) Meeting the quantitative needs set out in the EDNA

- 3.11 Based on the highest B1a/b need assessment of 3.6ha, plus the Growth Scenario need of 7.8ha, giving a total of 11.4ha, there is potentially a shortfall in excess of 10ha of land suitable for E class uses. This shortfall is exacerbated when B1c/B2 requirements are also factored in by an additional 15.7ha (based on Experian and total growth scenario), giving a total shortfall of 10.21ha. However this analysis is based solely on sites which are only suitable for E class and/or B2 class uses, and there is a further 22.42ha of potential employment land available still.
- 3.12 If that 22.42ha was used to meet the B1a/b B1c/B2 (predominantly E use class) shortfall of 10.21ha, there would be 12.12ha remaining to meet B8 needs of 13.8ha (9.7ha Growth Scenario Total + 4.1ha Experian), which would leave a shortfall of approximately 1.68ha of land for B8 uses.
- 3.13 In simple terms, with a cumulative highest need of 39.9ha for all employment land uses set against a potential future supply of 39.31ha of employment land, there is a shortfall of 0.59ha across Copeland.
- 3.14 Whilst this could be considered as a 'highest growth scenario', as the assessment is considered against the highest of the need assessment and factoring in all the Growth Scenarios, a failure to identify sufficient employment land to meet needs will have a significant impact upon economic growth in Copeland.

d) Meeting the qualitative needs set out in the EDNA

- 3.15 As set out in draft policy DS2PO, Whitehaven is the principal settlement and therefore most new development should be located here. However, it is clear from the potential supply, there

is only 4ha of employment land available. A similar lack of sites is also the case in Egremont, although it has a slightly higher supply than Whitehaven. Whilst at Cleator Moor, it can facilitate the expansion of the Leconfield Industrial Estate. Despite being a Key Service Centre, the qualitative research highlighted there was little demand beyond local in this settlement, unsurprisingly there are no potential sites for allocation identified in Millom in the ELAS.

- 3.16 The main area of demand not picked up through the quantitative and 'by settlement' analysis of stakeholder responses is the demand for more space at Westlakes Science Park, which is adjacent to the settlement of Moor Row. Moor Row has the highest potential supply of all the settlements (16.07ha).

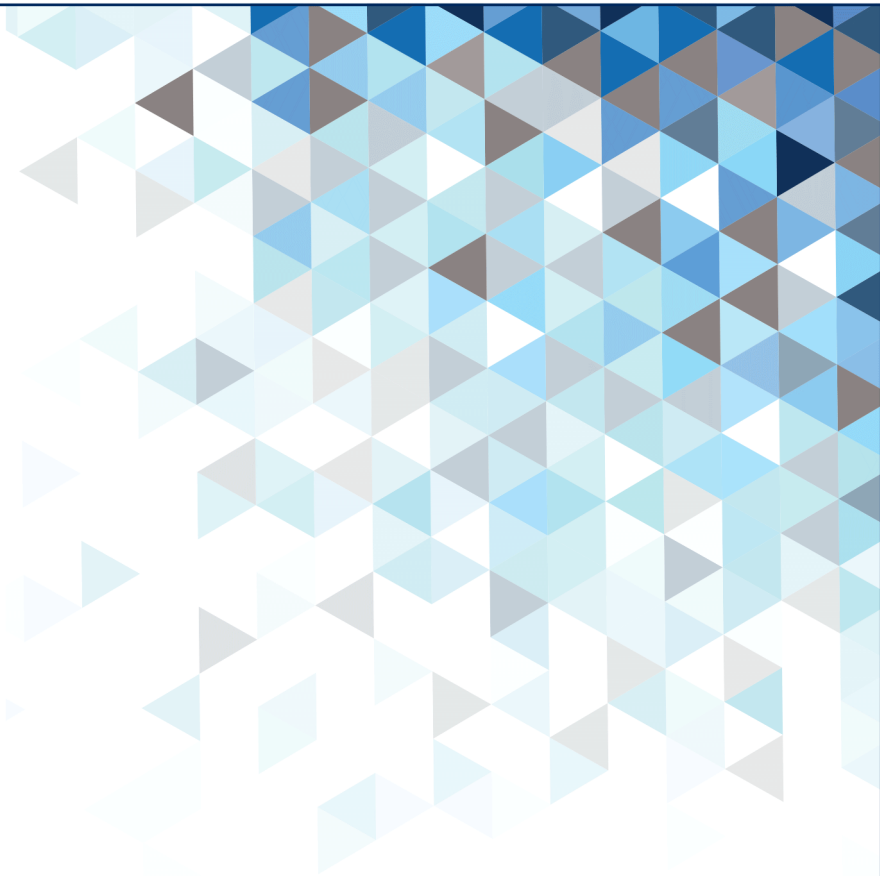
e) Overall Commentary

- 3.17 There is an overall shortfall of potential employment land within Copeland Borough of approximately 0.59ha, should the highest growth scenario be taken by the Council. If only a selection, or none of the growth scenario components form part of the Local Plan, the shortfall could decrease or no longer exist.
- 3.18 Assuming the Council do wish to take the highest growth scenario then more land for employment uses is required. The key areas for more employment growth, based on the stakeholder feedback and market analysis would be at settlements and locations in the north of the Borough, along, or within easy access of the A595 (Whitehaven, Egremont and Cleator Moor).
- 3.19 The additional 16.07ha within or adjoining Westlakes Science Park should satisfy that specific market demand and will contribute to the overall employment land requirements.

4.0 NEXT STEPS

4.1 The recommended next steps for taking forward the findings of this ELAS are as follows:

- Take forward the potential employment sites, through any further assessment / Sustainability Appraisal process to determine their suitability for employment land allocation;
- Review employment policies;
- Identify Westlakes Science Park within the settlement hierarchy with particular reference to meeting employment need;
- Re-engage with sites identified as unsuitable solely on availability, to seek to identify these as suitable, available and achievable employment land; and
- Consider the potential to safeguard employment land for use beyond the Local Plan period around Westlakes Science Park and Cleator Moor as these are key locations identified through stakeholder engagement and are likely to continue to play an important role beyond the plan period.

**BEDFORD****Planning / SDD / SPRU**bedford@dlpconsultants.co.uk**BRISTOL****Planning / SDD / SPRU**bristol@dlpconsultants.co.uk**EAST MIDLANDS****Planning/ SDD**nottingham@dlpconsultants.co.uk**LEEDS****Planning**leeds@dlpconsultants.co.uk**LONDON****Planning**london@dlpconsultants.co.uk**MILTON KEYNES****Planning**miltonkeynes@dlpconsultants.co.uk**RUGBY****Planning**rugby.enquiries@dlpconsultants.co.uk**SHEFFIELD****Planning/ SDD / SPRU**sheffield@dlpconsultants.co.uk**RTPI**

Chartered Town Planner

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