#### Matter 16 Employment Site Allocations

*Issue – Whether the proposed employment allocations and opportunity sites are justified, effective and consistent with national policy?* 

Relevant policies: E3PU; E4PU; E5PU; E6PU

#### Site Selection

- 16.1 Was the methodology used to assess and select the proposed site allocations and opportunity sites appropriate? Were reasonable alternatives considered and tested? Are reasons for selecting the preferred sites and rejecting others clear and where is this set out?
- 16.1.1 Yes. The existing employment allocations in the Copeland Local Plan 2013-2028, together with some Opportunity Sites and sites submitted through the Calls for Sites processes were all subject to an initial high level assessment<sup>1</sup> that supported the Preferred Options consultation to ensure all reasonable alternatives were considered at an early stage. The results of this, together with any alternative sites proposed were then taken forward by the consultants producing the ELAS (EB16).
- 16.1.2 The ELAS assessed 67 sites for their potential as employment land (use classes E (business), B2 and B8) to identify a suitable, available and achievable supply of land for economic development in Copeland.
- 16.1.3 The site assessment process involved a series of stages including landowner identification, desk-based assessment and site visits 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.
- 16.1.4 Of the 67 sites assessed, 17 are considered to be potentially suitable for allocation. These sites, together with the existing employment sites were subject to Sustainability Appraisal and HRA assessments. 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 (office space) 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 (E, B2 and B8).
- 16.1.5 The land identified is sufficient suitable land to meet the needs identified in the EDNA (EB15). However, as more than half of this land is focussed on two strategic sites (Westlakes Science and Technology Park and Leconfield Industrial Estate), and most of the alternative sites that were proposed were not considered suitable in the ELAS, the Council has also

<sup>&</sup>lt;sup>1</sup> <u>https://www.copeland.gov.uk/sites/default/files/attachments/employment\_opportunity.pdf</u>

included existing employment sites which have additional undeveloped areas as Employment Allocations to provide additional land to meet local needs.

16.1.6 This approach has allowed all potential sites to be considered, with the most suitable taken forward as allocations, and additional provision on existing employment sites to provide additional flexibility and choice for local businesses.

Westlakes Science and Technology Park (Policy SP E3PU)

## 16.2 What is the background to the site allocation? How was it identified and which options were considered?

- 16.2.1 The existing Science Park is identified in Policy ER6 of the Copeland Local Plan 2013-2028<sup>2</sup>, with a number of extensions to the site allocated as Employment Allocations via saved policies EMP1 and EMP2. These sites formed the scope to identify the land required for the current Local Plan.
- 16.2.2 The additional allocations were considered through the ELAS (CD16) and also considered for other uses through the SHLAA process in order to determine whether all of the additional expansion land was required and whether it may be more appropriate to deallocate it or propose it for a different use.
- 16.2.3 It was not considered that all of the land would be required for the new Local Plan so the land to the north of the Science Park is no longer proposed as an extension for the Science Park, and it is instead now proposed to be allocated for housing linked to Summergrove (site ref. HSU1)
- 16.3 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction? How much residual land is there for development? Does this site contribute towards the employment land requirement or is it additional to it?
- 16.3.1 The main Westlakes Science and Technology Park is an existing strategic employment site that has had planning permission for more than 20 years, is fully laid out with development plateaus and an estate road throughout the site with a number of remaining plots for future development. It has approximately 6ha of undeveloped land and so is likely to require further allocations to support all of the growth scenario projects identified in the EDNA (EB15) if they were to happen.
- 16.3.2 It is an attractive and popular site with larger companies within the Sellafield supply chain as well as higher education institutions that is developed to a low density with mature planting throughout the site.
- 16.3.3 The extension areas that have been allocated would provide approximately 9.5ha additional land if required (2.5ha and 7ha approx.). Westlakes Science and Technology Park and its

<sup>&</sup>lt;sup>2</sup> https://www.copeland.gov.uk/sites/default/files/attachments/copeland\_local\_plan\_2013\_2028.pdf

Employment extension allocations are part of the employment land package required to meet the needs identified from the growth scenario projects in the EDNA.

## 16.4 What is the basis for the scale and mix of uses proposed? Is this justified? How would an application for ancillary, and in particular town centre uses be assessed?

- 16.4.1 It is anticipated that development will continue to be of a low density across the remainder of the existing Science Park, largely based upon the existing plateaus that have been established. A general continuation of this approach is also expected for the extensions. The detail of how this will be delivered will be outlined in the masterplan.
- 16.4.2 The primary focus for the site is employment uses associated with the Science Park (E(g) and F uses), however it is recognised that due to its location ancillary uses to support the employees will be needed and this is shown in Policy E3PU. The most effective way to provide these uses is for the Science Park as a whole rather than within every building individually.
- 16.4.3 Proposals for ancillary uses would be considered in terms of their need, which should be demonstrated, and their scale and potential impact (i.e. to ensure they do not become a 'destination' in their own right and draw people from other town centres rather than meet the needs of the Science Park).
- 16.5 What are the potential adverse impacts of developing the remaining parts of the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective, particularly with regards to the River Ehen SAC
- 16.5.1 The existing Science Park and extensions allocations are all located within Flood Risk Zone 1, with the SFRA recommending that development could take place subject to the findings of a site specific Flood Risk Assessment.
- 16.5.2 In terms of historic environment, the Heritage Impact Assessment (EB27, page 27) identifies a potential impact of 1, where 'consideration of heritage may be required' for the existing Science Park and smaller extension (ref. Es1b). The larger extension allocation is identified as having a potential impact of 2, where 'attention to heritage will be required' due to its proximity to Scalegill Hall.
- 16.5.3 Further expansion of the site could significantly increase the number of trips and so Travel Plans will need to be produced, or ideally a Travel plan for the whole site to manage the number of trips by private vehicle. In addition to this, improvements will be required to the Science Park's junctions with the A595, together with other measures that are identified in the Transport Improvement Study (EB23) and outlined in paragraph 16.6.3 below.
- 16.5.4 The existing Science Park already has mature planting and significant landscaping around and through the site so the landscape impacts should be relatively low. A similar approach should be investigated for the extension allocations and this will be picked up through the masterplanning process.

16.5.5 The assessment of the site through the HRA process identifies a potential for impacts on the River Ehen SAC water quality. The HRA recommends a project specific HRA that will include a Construction Environment Management Plan (CEMP) to address and manage the risks during construction, and a drainage strategy (covering waste water, sewerage and potentially SuDS) that must be in place before first occupation to mitigate the potential impacts. Further details can be found in the new Appendix H of the Local Plan and the HRA (CD5). This recommendation has been made a requirement in the Local Plan (CD1) via paragraph 7.6.5.

# 16.6 What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?

- 16.6.1 The existing Science Park is fully laid out with the remaining undeveloped plateaus (plots) identified and connected to the site's main road and so they are ready to develop. The site has also been fully landscaped, so only limited infrastructure would be required to develop these plots themselves.
- 16.6.2 The smaller of the extension allocations for the site (ref. ES1b) would represent a rounding off and not require significant infrastructure either. The larger extension allocation (ref ES1c) is less well related to the existing infrastructure and would require investment to provide those connections, but the requirement for this land is likely to be towards the end of the Plan period and can be picked up in more detail through the masterplanning approach that the Council will undertake with the site's owners.
- 16.6.3 Even though there is limited infrastructure requirements needed for the site itself, at least in the short term, its size and the potential scale of additional development it could support means that it has been identified to contribute to a number of wider transport improvements in the Transport Improvement Study (EB23 Section 9) as follows:
  - Provision of an off-road cycle access to the NCN72 from the Science Park
  - A595/New Road Whitehaven junction improvements
  - A595/Inkerman Terrace and A595/Ribton Moorside Whitehaven junction improvements
  - Homewood Road Whitehaven roundabout junction improvements
  - A595/Mirehouse Road Whitehaven junction improvements
  - A595/Crow Park Way (access into the Science Park) improvements
  - Moresby Road/Cleator Moor Road/Main Street Hensingham junction improvements
  - Cleator Moor Road/Overend Road Whitehaven junction improvements
  - A595/Moor Row junction improvement
  - St Bees Road/Mirehouse Road improvements
  - Castle Villas/Main Street Egremont junction improvement
- 16.6.4 It is not intended that development of the Science Park would be required to pay for all of these projects, as the Council will seek alternative sources of funding to deliver them. There

is also the possibility that contributions towards improvements along the A595 could help unlock funding from National Highways.

### 16.7 Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?

- 16.7.1 Yes. The site is owned by BEC, a regeneration company (owned by the Nuclear Decommissioning Authority, Copeland and Allerdale Borough Councils and Cumbria County Council) who has successfully supported and enabled the development of the Science Park to date.
- 16.7.2 Demand for space on the Science Park is generally consistently high for the local market, as the strategic site for the borough, and is the base for a number of Tier 1 and 2 Sellafield supply chain companies as well as Higher Education establishments.

# 16.8 How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?

- 16.8.1 As discussed above, the site is a popular location within Copeland and a strategic site for west Cumbria so the market will play a large part. Historically development has taken place of buildings to meet the needs of an identified end user.
- 16.8.2 The effective delivery of the site will be through the development of a masterplan that will be produced by BEC in collaboration with the Council. BEC have recently approached the Council to start this masterplanning process.

#### 16.9 What is the expected timescale and rate of development and is this realistic?

- 16.9.1 It is expected that development will continue at a relatively steady rate on the existing Science Park throughout the Plan period. This is largely based upon past delivery and demand for the site.
- 16.9.2 The requirement for, and timing of, development on the extension allocations will largely depend on the progress made with the growth scenario projects identified in Section 8 of the EDNA (EB15).

#### Cleator Moor Innovation Quarter at Leconfield (Policy SP E4PU)

### 16.10 What is the background to the site allocation? How was it identified and which options were considered?

16.10.1 Paragraphs 7.7.1 to 7.7.6 of the Local Plan Publication Draft (CD1) outline the background to the Cleator Moor Innovation Quarter (CMIQ) as a site to deliver the Industrial Solutions Hub (ISH) and business cluster around nuclear and energy specialisms to create a UK Centre of Excellence.

- 16.10.2 The Council's Property department and ISH representatives considered a number of options and sites for delivery in west Cumbria; Leconfield Industrial Estate was considered to be the only site that could deliver the objectives of the business cluster. Its location close to Westlakes Science and Technology Park means that the two sites can provide a complementary offer to meet the different needs of businesses involved in Sellafield's supply chain and the growth scenario projects identified in the EDNA (EB15).
- 16.10.3 It also had the additional benefits of being located within a Key Service Centre in Copeland, and so can rejuvenate an old and under used industrial estate whilst providing high quality jobs and increasing footfall in a town that has a number of deprived wards.
- 16.10.4 In 2021 Leconfield Industrial Estate was brought under public ownership by Copeland Borough Council. The land identified as Associated Growth Area 2 in Policy E4PU is already in Council ownership.
- 16.11 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction? How much residual land is there for development? Does this site contribute towards the employment land requirement or is it additional to it?
- 16.11.1 A significant portion of the site is allocated in the Copeland Local Plan 2013-2028 (saved policies) for different uses. This is broken up as follows:
  - Leconfield Industrial Estate is an existing industrial estate and is allocated as an Employment Opportunity Site (ref. EOS3) in Saved Policy EMP3. An undeveloped part of the site is also and Employment Allocation (ref. E6) in Saved Policy EMP1.
  - Associated Growth Area 2 is the undeveloped portion of Housing Allocation HS8 in Saved Policy HSG2, which is unlikely to come forward for housing due to access issues through Heather Bank estate
  - The south western portion of Associated Growth Area 3 is allocated for Employment (ref. E7) in Saved Policy EMP1. The remainder of Associated Growth Area 3 is unallocated.
- 16.11.2 Recent applications on Leconfield Industrial Estate prior to the Council's ownership have generally been small scale change of use and demolition of redundant buildings.
- 16.11.3 Since the Council has acquired Leconfield Industrial Estate a number of applications have been submitted, and some approved to help enable the reconfiguration of the site. These include:
  - Planning permission to relocate BOC Yard within the site (4/22/2161/0F1) Approved
  - Planning permission for refurbishment of existing buildings (4/22/2211/0F1, 4/22/2211/0F1, 4/22/2212/0F1) Approved
  - Outline planning application to develop a hub building for the Cleator Moor Innovation Quarter (4/22/2184/001) – to be determined

- Outline planning application for the Cleator Moor Innovation Quarter Masterplan (4/22/2308/001) to be determined
- 16.11.4 As the Leconfield Industrial Estate is already in use, and has a number of existing businesses that play an important role for the town, the amount of developable space on the industrial estate amounts to approximately 7.5ha gross. Associated Growth Area 2 is approximately 2ha, and Associated Growth Area 3 could potentially provide up to approximately 10ha of employment land.
- 16.11.5 The land within the Leconfield Industrial Estate contributes to the employment land supply, and Associated Growth Area 2 could contribute towards E(g) uses, but does not currently officially count towards the supply. Associated Growth Area 3 does not count towards the employment land supply.
- 16.12 What status do the Growth areas have? Are they allocated in this Plan? Have they been subject to Sustainability Appraisal and Habitat Regulations Assessment and any other assessments?
- 16.12.1 As a starting point it should be re-emphasised that the focus for employment development is the Leconfield Industrial Estate. The Associated Growth Areas have slightly, and subtly, different roles to support the success of the CMIQ as follows:
  - Area 2 is an allocation in this Local Plan, which can provide accommodation for those using the CMIQ, as well as some business uses that would be acceptable near residential properties. This in effect has changed the focus of the extant allocation to a more beneficial and deliverable use by changing the housing allocation to a different type of accommodation together with small scale business use to support the Leconfield site. Also, it is within the ownership of Copeland Borough Council and is therefore deliverable.
  - Area 3 is not formally allocated as it is not currently required to meet the needs identified in the EDNA. Its purpose is to enable the long term success of the CMIQ if demand and development takes up the remaining space on the Leconfield Industrial Estate. It is also in private ownership and the landowner has not indicated that they wish it to be developed, so it was considered unavailable when assessed in the ELAS (EB16).

As a result the Local Plan identifies Area 3 as part of the CMIQ to enable the area and opportunities to be considered as a whole in any masterplan, as Area 3 could provide space for biodiversity net gain, among other things, to improve the quality of proposals overall on the CMIQ. It could also enable early planting and infrastructure to ensure land is available if the increased demand materialises.

- 16.12.2 As a result of the above, Area 2 has been subject to Sustainability Appraisal, Habitat Regulations Assessment and other assessments as part of the CMIQ, but Area 3 has not had the same level of assessment.
- 16.12.3 It is intended that Area 3 can be reconsidered and formally allocated, if required, at the 5 year review point, unless development monitoring identifies it to be needed sooner.

- 16.13 What is the basis for the scale and mix of uses proposed? Is this justified? How would an application for ancillary, and in particular town centre uses be assessed? How would student accommodation relate to other uses on the site?
- 16.13.1 The mix of uses provides a focus of employment uses (E(g), B2 and B8) on the Leconfield Industrial Estate to retain the focus for the business cluster, together with supporting facilities concentrated within a single hub building at the heart of the site. This location will ensure that they are most accessible for all users of the site and also reduce the risk of competition at the expense of the town centre. The town centre type elements will also be of a small scale to prevent them being competition for Cleator Moor Town Centre.
- 16.13.2 The employment buildings will vary in size across the full spectrum of employment uses to provide appropriate accommodation in a flexible manner for a range of businesses associated with the Sellafield supply chain and growth scenario projects from the EDNA (EB15). This will be represented spatially in an approved masterplan.
- 16.13.3 As discussed in responses to Questions 16.11 and 16.12 Area 2 is currently allocated for housing in the Core Strategy so an accommodation type use is already accepted in that location in principle. The idea behind the student accommodation is to support the functioning of the CMIQ, which will have a strong element of skills sharing and development, and those people may reside permanently in other parts of the UK or abroad and require suitable accommodation close to the CMIQ while in west Cumbria. This would provide a professional and academic environment in a sustainable location close to Cleator Moor town centre.
- 16.14 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?
- 16.14.1 Leconfield Industrial estate is mainly located within Flood Risk Zone 1 and directly adjacent to Flood Zone 3a, with the SFRA recommending that flood risk should be manageable through careful consideration of site layout and design around the flood risk early on in the planning stage. Growth Area 2 is within Flood Risk Zone 1 and the SFRA recommends that development could take place subject to the findings of a detailed Flood Risk Assessment.
- 16.14.2 The south western portion of Associated Growth Area 3 is located within Flood Risk Zone 3b, with the remainder in Flood Zone 1, and the SFRA recommends that flood risk should be manageable through careful consideration of site layout and design around the flood risk early on in the planning stage. The Council would not expect development to take place within the part of the site which is in Flood Risk Zone 3b, and instead it could help support SuDS and/or provide natural and habitat rich space within the overall CMIQ and provide biodiversity net gain on site.
- 16.14.3 In terms of historic environment, the Heritage Impact Assessment (EB27, page 28) identifies a potential impact of 1, where 'consideration of heritage may be required' for Leconfield Industrial Estate and Associated Growth Area 3. The score is zero for Associated Growth Area 2.

- 16.14.4 Leconfield Industrial Estate and Associated Growth Area 2 are generally well related to the settlement with some trees throughout the site and around its edge towards the north, and as such further development should have limited impact on the landscape. Associated Growth Area 3, if developed, would extend the town into the open countryside and would require suitable and well designed screening to mitigate the visual impacts of development and soften the new edge for the town in the north.
- 16.14.5 Redevelopment and intensification of uses on Leconfield Industrial Estate could significantly increase the number of trips and so Travel Plans will need to be produced, or ideally a Travel Plan for the whole site to manage the number of trips by private vehicle. This was assessed by the Transport Improvement Study (EB23) for Leconfield Industrial Estate and Associated Growth Area 2, and the wider improvements required to mitigate the impacts of the CMIQ are outlined in paragraph 16.15.3 below.
- 16.14.6 The assessment of the site through the HRA process identifies a potential for impacts on the River Ehen SAC water quality. The HRA recommends a project specific HRA that will include a Construction Environment Management Plan (CEMP) to address and manage the risks during construction, and a drainage strategy (covering waste water, sewerage and potentially SuDS) that must be in place before first occupation to mitigate the potential impacts. Further details can be found in the new Appendix H of the Local Plan and the HRA (CD5). This recommendation has been made a requirement in the Local Plan (CD1) via paragraph 7.7.15.
- 16.14.7 These matters, along with other planning matters, should be considered through the masterplanning process.
- 16.15 What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?
- 16.15.1 As the site is a brownfield site in a low value area that has had a range of historic uses public funding is required to help remediate and unlock the site's potential, and help develop some of the plots on Leconfield Industrial Estate.
- 16.15.2 The Enterprising Town element of the Cleator Moor Town Fund bid will support the deliver the first phase of the CMIQ, which includes the hub building and supporting the redevelopment of the western side of Leconfield Industrial Estate. A further funding bid has been submitted to the Levelling Up fund to help deliver the remainder of Leconfield Industrial Estate and Associated Growth Area 2.
- 16.15.3 The Transport Improvement Study (EB23 Section 9) identifies a number of wider transport improvements that development of Leconfield Industrial Estate and Growth Area 2 may be required to contribute towards as follows:
  - Provide off-road cycle access to the NCN71 from Leconfield estate
  - New pedestrian refuge near Bowthorn Road to connect to bus stops on Leconfield Street

- A595/Inkerman Terrace Whitehaven junction improvements
- Homewood Road Whitehaven junction improvements
- Moresby Road/Cleator Moor Road/Main Street Hensingham junction improvements
- Cleator Moor Road/Overend Road Whitehaven junction improvements
- A595/Rosehill Whitehaven junction improvements
- A595/Moor Row junction improvements
- 16.15.4 In addition to this, development of Associated Growth Area 3 is likely to require a new access from Bowthorn Road and associated upgrades to the local road network. It may also require further contributions to help mitigate wider impacts identified in the Transport Improvement Study.

### 16.16 Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?

- 16.16.1 Leconfield Industrial Estate and Associated Growth Area 2 are in Copeland Council ownership, and funding has been approved to develop the hub and western site of Leconfield (phase 1). Further funding bids have been submitted for the remainder of the Leconfield and Associated Growth Area 2.
- 16.16.2 As such initial development on the core of the site to kick start the business cluster is deliverable. There has been interest from companies wishing to locate on the CMIQ, and this should help with the further funding bid(s).
- 16.16.3 Development of these allocated areas should support the growth scenario projects identified in the EDNA (EB15). If further demand materialises expansion into Associated Growth Area 3 will need to be planned and negotiated. It is understood that this is not in the Council's ownership at this time.

# 16.17 How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?

- 16.17.1 Delivery of the Cleator Moor Innovation Quarter will be led by Copeland Borough Council as landowner. The first phase has funding approved and a further funding bid has been made for phase 2. A coordinated approach to the development of the site, and ensuring required contributions to secure sustainability and mitigate impacts, will be ensured through a rigorous masterplanning process and close engagement between Copeland Borough Council planners and the Council's Property team and their consultants.
- 16.17.2 Further detail about the project management can be made available by the Council's Property team

#### 16.18 What is the expected timescale and rate of development and is this realistic?

16.18.1 The approved funding and further bids should support the effective deliver of Leconfield Industrial estate within 5 years or so if required. The actual delivery rate will depend upon demand from Sellafield supply chain and also decisions relating to the growth scenario projects in the EDNA.

16.18.2 It is likely that any development in Associated Growth Area 3 would not be required until 6 years+.

**Employment Sites and Allocations (SP E5PU)** 

Responses to questions 16.19 to 16.26 for all Employment Sites and Allocations can be found in Matter 16 Appendix A.

**Opportunity Sites (SP E6PU)** 

- 16.27 What status do the opportunity sites have? Are they allocated in this Local Plan? Do they contribute to the employment land requirement and/or the retail requirement?
- 16.27.1 The primary purpose of Opportunity Sites is to help focus regeneration and funding towards key sites, usually within town centres in the borough. It is a long standing approach that has been used in Copeland and elsewhere and has had success in the past with the redevelopment of a number of key sites and buildings. It is intended to keep the list of sites under review, and the Council is considering providing further information about sites as a portfolio of opportunities in Copeland that can be updated and refreshed regularly to help attract investment into the borough.
- 16.27.2 Opportunity Sites have the potential to be redeveloped for a number of different uses to give the flexibility for investors, and also allow them to align to future town centre masterplans as they are produced. Those within and on the edge of town centres can be used to meet any retail needs, and a number could be used to meet employment and particularly E(g) uses, but are not identified solely for either of those particular uses to enable their effective redevelopment and rejuvenation of the town centres. As such they are not part of the formal employment land supply or a retail specific allocation, but can flexibly be developed to meet those requirements.
- 16.27.3 It is hoped they will provide active, commercial type uses on the ground floors and then also provide opportunities for other uses such as residential above where appropriate. Appendix C in the Local Plan Appendices document (CD2) gives an indication of suitable and preferred uses for each site.

Responses to questions 16.28 to 16.35 for all Opportunity Sites can be found in Matter 16 Appendix B.

#### Appendix A

The following tables provide responses to Questions 16.19 to 16.26 for each of the Employment Sites and Allocations identified in the Copeland Local Plan 2021-2038 Publication Draft as follows:

- ES3 Whitehaven Commercial Park, Moresby Parks
- ES4 Sneckyeat Road, Whitehaven
- ES5 Haig Business Park
- ES6 Red Lonning, Whitehaven
- ES7 Bridge End, Egremont
- ES13 Devonshire Road, Millom
- ES12 Mainsgate Road, Millom
- ES8 Furnace Row, Distington
- ES9 Frizington Road, Frizington
- ES11 Haverigg Industrial Estate, Haverigg
- ES14 Seascale Rural Workshops
- ES10 Energy Coast Business Park, Haile

ES3 W	ES3 Whitehaven Commercial Park, Moresby Parks		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Whitehaven Commercial Park is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E2).	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the Whitehaven Commercial Park are shown below.	
		4/21/2565/0F1 – Retrospective Planning Application: "Retention of New Building to be Used as a Workshop and Store and Surfacing of Yard with Concrete"	
		4/20/2369/0F1 -The use of the western part of the site as a storage yard in association with hire of plant and tool equipment (including the use of the building known as 'Unit 2' as a workshop, store and ancillary office with associated staff welfare facilities) (and regularisation of all associated activities and structures on site) (retrospective); •The use of the eastern part of the site as a storage yard in association with hire of non-mechanical equipment, welfare equipment, lifting equipment and some plant and tool equipment and regularisation of all associated activities and structures on site (retrospective); •All existing activities and structures associated with the operation of the sites including fencing, external lighting, wash bay and disposal point (retrospective); •Proposed eastward expansion of the existing eastern storage yard to be used in association with storage and hire of non-mechanical equipment, welfare equipment, lifting equipment and some plant and tool equipment (at present the land designated for the expansion has just been scraped but hard core will have to be laid).	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation, which includes 11ha of undeveloped land is larger than the area identified in the ELAS (1.80ha) because it is likely development will come forward on land in both ownerships as has been shown in the recent applications (despite only one landowner responding to the ELAS consultants).	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of	Whitehaven Commercial Park is an existing employment site with full road infrastructure provided within the site and is partly developed.	

ES3 W	ES3 Whitehaven Commercial Park, Moresby Parks	
	transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>It is situated in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>Potential impacts upon SPA species including Harrier Hen through loss or disturbance to off-site supporting habitats. The site will require project-specific HRA that includes a project-level assessment of the proposed development area and surrounding habitats. Full details are in New Appendix H/HRA) (CBC11).</li> <li>The ELAS (EB16 page 14) suggests that new development, using green infrastructure planning, could help to define the urban edge and preserve a buffer between Whitehaven and sensitive moorland to the east</li> </ul>
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>Whitehaven Commercial Park is an existing employment site which is partly developed.</li> <li>The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site should contribute towards: <ul> <li>Provision of shared use path on Moresby Parks Road</li> <li>Bus stop and shelter on Moresby Parks Road</li> <li>New bus service to Moresby Parks</li> </ul> </li> </ul>
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	<ul> <li>Whitehaven Commercial Park is an existing employment site that is already partly developed, with a mix of mainly SME and local businesses.</li> <li>It is expected that this is likely to continue and it may be a location favoured by businesses relocating (e.g. from Opportunity Sites) or as they outgrow existing premises.</li> <li>The recent applications and developments show that there is interest and the site is still being developed.</li> </ul>
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	Whitehaven Commercial Park is an existing employment site whose infrastructure is largely in place and so further development will be left to the market. It is expected that development plots will be made available at the size required as enquiries are made by businesses wanting to locate there, as has been the case in the past.

ES3 Wh	ES3 Whitehaven Commercial Park, Moresby Parks	
16.26	What is the expected timescale and rate of development and is this realistic?	Whitehaven Commercial Park is an existing employment site that is partly built and we would expect this to continue slowly but steadily during the Plan period.

ES4 Sn	ES4 Sneckyeat Road, Whitehaven		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Sneckyeat Road is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E4).	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the industrial estate are shown below:	
		4/21/2233/0F1: Erection of three business/industrial buildings to provide 12 self-contained units (use classes B2, B8 and Classes E(G)(I), E(G)(II), AND E(G)(III), Car Parking, Access and Associated Works.	
		This approval highlights the continued economic demand for employment space on Sneckyeat Rd.	
		4/20/2441/0F1: Change of use of existing land into a staff car park for the West Cumberland Hospital	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation is historic, and the undeveloped area in the Publication Draft is 1.1ha.	
		Part of this 1.1ha is currently used as a car park for West Cumberland Hospital, and we understand current the lease expires midway through the Plan period. As such it is proposed to maintain the land's status within the Employment Allocation.	
		The Council would be happy to reduce the 'undeveloped' area to 0.35ha to exclude the car park in Policy E5PU, with a view to reviewing its usage, availability and requirement by the hospital at the 5 year review point for the Local Plan.	
16.22	What are the potential adverse impacts of developing the site and how could these be	• Sneckyeat Road is an existing employment site with full road infrastructure provided within the site and is largely developed.	
	mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc.	<ul> <li>It is situated in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> </ul>	

ES4 Sn	54 Sneckyeat Road, Whitehaven		
	Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The Heritage Impact Assessment (EB27 page 28) assesses the potential impact as 2 and that 'attention to heritage will be required'</li> <li>The following ecological surveys are recommended to enable a more detailed assessment of ecological constraints and /or opportunities should this land be proposed for development, to accompany the planning application:</li> <li>Extended Phase 1 Habitat survey of the whole site including production of a habitat map during the optimal survey period from April to September – this will form the basis for any more detailed survey work.</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>The site is an existing employment site which is largely developed and so already has the necessary infrastructure.</li> <li>The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site could contribute towards: <ul> <li>A pedestrian refuge on Homewood Road in proximity to the industrial estate</li> <li>Segregated cycle track on Homewood Road</li> </ul> </li> </ul>	
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Sneckyeat Rd is an existing employment site that is already largely developed and meets the needs of local businesses, and this is expected to continue in the longer term.	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	Sneckyeat Rd is an existing employment site that is popular with local businesses. It has largely been developed and does not need any intervention to deliver the remainder of the site.	
16.26	What is the expected timescale and rate of development and is this realistic?	Sneckyeat Rd is an existing employment site that is already largely developed.	

ES5 Haig Business Park		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Haig Business Park is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E3).
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the business park include: 4/21/2180/0F1: Change of use from employment use to use as a centre by time to change west Cumbria, for a defined 5 year period. 4/19/2382/0F1: Permanent Change of use of mining museum to offices
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. Its scale is limited by the existing historic buildings and form of the site as the site is largely developed to capacity.
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is situated in Flood Risk Zone 1, and the SFRA recommends that detailed consideration of site layout around flood risk will be required</li> <li>The Heritage Impact Assessment (EB27 page 29) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood' due to the proximity to Haig Colliery Scheduled Monument.</li> <li>The site lies in a Small Blue Butterfly Potential Area</li> <li>Potential impacts upon Solway Firth SPA through water quality (in combination ) (New Appendix H/HRA) (CBC11).</li> <li>Requirement for site specific HRA at planning application stage that includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5)</li> </ul>
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	The site is an existing employment site which is largely developed to capacity and as such the required infrastructure is in place. The Transport Improvement Study (EB23 Section 9) identified that further development/intensification of the site could require a contribution towards traffic calming measures along High Road and Woodville Way.

ES5 Ha	ES5 Haig Business Park		
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Haig Business Park is an existing employment site that is already largely developed. Any further development, if feasible, would be small scale and would need to reflect the existing buildings and adjacent Haig Colliery SAM.	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	Haig Business Park is an existing employment site that is already largely developed. No active measures will be taken to further develop the site	
16.26	What is the expected timescale and rate of development and is this realistic?	Haig Business Park is an existing employment site that is already largely developed.	

ES6 Re	ES6 Red Lonning, Whitehaven		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Red Lonning is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E5).	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. There are no outstanding planning applications at this site.	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation is historic, and its scale is limited by the undeveloped area of 0.6ha.	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Red Lonning is an existing employment site with full road infrastructure provided within the site and is largely developed.</li> <li>It is situated in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	Red Lonning is an existing employment site which is partly developed and has no significant infrastructure needs. The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site should contribute towards a bus stop and shelter.	
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Red Lonning is an existing employment site that is already largely developed and it is likely that only one or two developments would be needed to complete the site.	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave it to the market to develop the remainder of the site.	

ES6 Red	d Lonning, Whitehaven	
16.26	What is the expected timescale and rate of development and is this realistic?	Red Lonning is an existing employment site that is already largely developed, so even relatively small scale development could complete the site.

ES7 Br	ES7 Bridge End, Egremont		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Bridge End is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E9 and E10).	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the industrial estate are shown below.	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	4/22/2064/0F1: Replacement of existing jet washes and erection of new jet wash bays The proposed mix of uses is a continuation of the extant usage of the site. The allocation is partly historic, and its scale of 5ha of undeveloped land reflects the desire to support potential opportunities that may arise at Moorside and/or the Clean Energy Park.	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Bridge End is an existing employment site with full road infrastructure provided within the site and is largely developed.</li> <li>It is situated in Flood Risk Zones 1 and 2, with the undeveloped part in Flood Zone 1. The SFRA recommends that detailed consideration of site layout and design around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 30) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'</li> <li>This site may require a Stage 1 habitat survey to ensure sustainable development.</li> <li>Potential impacts upon River Ehen SAC water quality (New Appendix H/HRA) (CBC11)</li> <li>Requirement for site specific HRA at planning application stage that will include a Construction Environmental Management Plan and Drainage Strategy (new appendix H – see modification MI-APP5)</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	Bridge End is an existing employment site which is largely developed, and the undeveloped area represents an extension to the site. Most infrastructure will be available, although a new spine road for the extension area may be required depending on the number and scale of new businesses moving there. The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site should contribute towards:	

ES7 Bridge End, Egremont		
		<ul> <li>Surface improvements on Bridge End as an alternative route to Vale View</li> <li>Signage on Bridge End as an alternative route to Vale View</li> </ul>
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Bridge End is an existing employment site that has already been partly developed. Its proximity to the A595 and Sellafield makes it an attractive location for businesses associated with the Sellafield site. The Council is aware of current interest to develop part of the undeveloped site.
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave the site's development to the market due to its attractive location and limited infrastructure required.
16.26	What is the expected timescale and rate of development and is this realistic?	It is likely that it will take most, if not all, of the Plan period to fully develop the site, and this will be kept under review as major projects at Sellafield and/or the Clean Energy Park could increase demand and accelerate delivery.

ES13 D	ES13 Devonshire Road, Millom		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Devonshire Road is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E13).	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the industrial estate are shown below. 4/21/2423/0F1: Siting of Two Portacabins	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation is historic, and its scale is limited by the undeveloped area of 1.3ha	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Devonshire Road is an existing employment site that is largely developed and it is not expected that the likely scale of development would result in any significant adverse impacts.</li> <li>It is situated in Flood Risk Zone 1 and 3a, with the undeveloped area within Flood Zone 1. The SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The site is within an area of known sites for natterjack toads</li> <li>The site may require a Stage 1 habitat survey to ensure sustainable development.</li> <li>Potential impacts upon National Site Network (NSN) sites through water quality (in combination). Requirement for a project specific HRA which includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (New Appendix H/HRA) (CBC11).</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>Devonshire Road is an existing employment site which is largely developed and so is unlikely to need significant infrastructure.</li> <li>The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site should contribute towards: <ul> <li>Traffic calming measures along Devonshire Road</li> <li>Bus stop and shelter on Devonshire Road</li> <li>New bus service between Millom and Haverigg</li> </ul> </li> </ul>	

ES13 D	ES13 Devonshire Road, Millom		
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Devonshire Road is an existing employment site that is already largely delivered. The key infrastructure is already in place and any future development would either be redevelopment of existing plots or the remaining undeveloped area.	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave the site's development to the market.	
16.26	What is the expected timescale and rate of development and is this realistic?	Devonshire Road is an existing employment site that is already largely delivered and further development could take place any time during the Plan period to support businesses in the south of the borough.	

ES12 N	ES12 Mainsgate Road, Millom	
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Mainsgate Road is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E12).
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the industrial estate are shown below.
		4/21/2121/0F1: Proposed extension to the south side of the ivory building to provide for a new entrance/lobby area, office space and a new staff cafeteria; new external spiral staircase to eastern elevation; new drainage works; provision of an attenuation pond within eastern field.
		4/22/2347/DOC: Discharge of Condition 7 of planning approval 4/21/2121/0F1
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation is historic, and its scale is limited by the undeveloped area of 1.5ha
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Mainsgate Road is an existing employment site with full road infrastructure provided within the site and is largely developed.</li> <li>It is situated in Flood Risk Zone 3a, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 32) assesses the potential impact as 1 and that 'consideration of heritage may be required'</li> <li>The site is within an area of known sites for natterjack toads</li> <li>This site will require a Stage 1 habitat survey to ensure sustainable development.</li> <li>Potential impacts upon National Site Network (NSN) sites through air quality (in combination). No development to take place until a project specific HRA has been undertaken to demonstrate no Likely Significant Effect on the NSN sites through reduced air quality in combination with other projects New Appendix H/HRA) (CBC11)</li> </ul>
		<ul> <li>Potential impacts upon National Site Network (NSN) sites through water quality combination). Requirement for a project specific HRA which includes a Construct</li> </ul>

ES12 Mainsgate Road, Millom		
		Environmental Management Plan and Drainage Strategy at planning application stage (New Appendix H/HRA) (CBC11).
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>Mainsgate Road is an existing employment site which is largely developed and the infrastructure is largely in place, with further development likely to be existing business expansion.</li> <li>The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site should contribute towards: <ul> <li>Traffic calming measures along Mainsgate Road</li> <li>Bus stop and shelter on Devonshire Road/St George's Road</li> <li>New bus service between Millom and Haverigg</li> </ul> </li> </ul>
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Mainsgate Road is an existing employment site that is already largely developed. Further developments there are likely to be delivered by the existing company (CGP Ltd) who may wish to expand their business.
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave development to the market.
16.26	What is the expected timescale and rate of development and is this realistic?	Mainsgate Road is an existing employment site that is already largely developed and the allocation is largely to support the existing business and others in the south of the borough.

ES8 Fu	ES8 Furnace Row, Distington		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Part of the site was in existing business use (as a car showroom) and proposed for allocation as an employment site through the Local Plan production process. While the Council supports this proposed allocation due to its relationship with Lillyhall, it was felt that a larger piece of land may be needed to make the site attractive to a wider range of businesses	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, part of the site is currently an existing business use and was proposed for formal allocation in the Local Plan Recent applications on the site are shown below. 4/21/2341/0F1: Change of Use from a Vehicle Showroom and Workshop (Sui Generis) to Retail (Class E(a))	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the types of uses at Lillyhall. Its scale is to support larger opportunities than would arise by solely allocating the car showroom for redevelopment.	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Furnace Row is considered accessible in the Site Access Assessment (EB24)</li> <li>It is situated in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 31) assesses the potential impact as 1 and that 'consideration of heritage may be required'</li> <li>This site may require a Stage 1 habitat survey to ensure sustainable development.</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	The Site Access Assessment identified the site as being accessible and the TIS identified the provision of footways to the adjacent roundabout and upgrading of the existing A595 Puffin crossing to a TOUCAN as schemes required to support the development of this site. In addition to this, it is considered that any future Transport Assessment should consider the ability of pedestrians to cross (with consideration of likely demand, presence of vulnerable users, traffic speeds, and traffic flows, the B5306 safely in order to access bus stops located on this road approximately 200-400m south west of the proposed site	
16.24	Is the development proposed viable and deliverable within the Plan period? What is the	Part of the site has been developed for commercial use and some or all of the remainder could help support the redevelopment of that site for future commercial/employment uses.	

ES8 Furnace Row, Distington		
	situation in relation to land ownership and developer interest?	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is currently intended to leave delivery to the market and there appears to be interest in the site
16.26	What is the expected timescale and rate of development and is this realistic?	The redevelopment of the car showroom/western portion could be within the first 5 years of the Plan. The remainder could come forward later in the Plan period if required and demand arises.

ES9 Fr	ES9 Frizington Road, Frizington		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Frizington Road is an existing employment site, which is currently allocated in the Copeland Local Plan via Saved Policy EMP1 (site ref. E17).	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with the undeveloped land allocated for employment use. Recent applications on the industrial estate are shown below:	
		4/22/2369/0F1: Extension of existing industrial building to provide mezzanine floor, including raising the overall height of the building by 2 metres (Max)	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation is historic, and its scale is limited by the undeveloped area of 0.8ha	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Frizington Road is an existing employment site with access road infrastructure provided within the site and is largely developed.</li> <li>It is situated in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 31) assesses the potential impact as 1 and that 'consideration of heritage may be required'</li> <li>This site may require a Stage 1 habitat survey to ensure sustainable development.</li> <li>Potential impacts upon River Ehen SAC water quality (New Appendix H/HRA) (CBC11)</li> <li>Requirement for site specific HRA at planning application stage that will include a Construction Environmental Management Plan and Drainage Strategy (new appendix H – see modification MI-APP5)</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>Frizington Road is an existing employment site which is largely developed to capacity, and it is not expected that the likely scale of development would require significant infrastructure. The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site could contribute towards: <ul> <li>Surface improvements on Park Street</li> <li>Footpath surface improvements</li> </ul> </li> </ul>	

ES9 Fri	ES9 Frizington Road, Frizington		
		<ul> <li>Surface improvements on Yeathouse Road</li> <li>Provision of signage on Yeathouse Road</li> </ul>	
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Frizington Road is an existing employment site that is partly developed. Further development could take place during the Plan period.	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is currently intended to largely leave the site's development to the market, as no significant investment is required to develop further plots.	
16.26	What is the expected timescale and rate of development and is this realistic?	<ul> <li>Frizington Road is an existing employment site that is partly developed. It provides for local needs and is likely to take time for developments on the site.</li> <li>With the change in focus at the nearby Leconfield Industrial Estate, which has now become a strategic employment site (the Cleator Moor Innovation Quarter) demand locally for plots and units on this site may increase.</li> </ul>	

ES11 H	ES11 Haverigg Industrial Estate, Haverigg		
16.19 16.20	<ul> <li>What is the background to the site allocation?</li> <li>How was it identified and which options were considered?</li> <li>What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?</li> </ul>	<ul> <li>Haverigg Industrial Estate is an existing employment site.</li> <li>The site is not currently identified in the Local Plan, as historically existing uses were not identified and only the additional undeveloped/cleared land was allocated.</li> <li>As outlined above, the site is currently an existing employment site. Recent applications on the industrial estate are shown below.</li> <li>4/22/2457/0F1: Proposed Erection of Four Self Contained Industrial Units (still to be</li> </ul>	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	validated) The proposed mix of uses is a continuation of the extant usage of the site and is primarily there to support the redevelopment of the site and help promote and protect its employment uses.	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>Haverigg Industrial Estate employment site is largely developed to capacity. It is not expected that any prospective scale of development would result in significant adverse impacts.</li> <li>It is situated in Flood Risk Zone 3a, and the SFRA recommends that detailed consideration of site layout and design around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 31) assesses the potential impact as 1 and that 'consideration of heritage may be required'.</li> <li>The site is in an area with potential for natterjack toads and the site will require phase 1 habitats survey</li> <li>Potential impacts upon National Site Network (NSN) sites through air quality (in combination). No development to take place until a project specific HRA has been undertaken to demonstrate no Likely Significant Effect on the NSN sites through reduced air quality in combination with other projects New Appendix H/HRA) (CBC11)</li> <li>Potential impacts upon National Site Network (NSN) sites through water quality (in combination). Requirement for a project specific HRA which includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (New Appendix H/HRA) (CBC11).</li> </ul>	

ES11 H	ES11 Haverigg Industrial Estate, Haverigg		
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	Haverigg Industrial Estate is an existing employment site which is largely developed to capacity, and it is not expected that the likely scale of development would require significant infrastructure.	
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Its allocation is to help provide a focus for businesses in south Copeland.	
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	Haverigg Industrial Estate is an existing employment site that is already largely delivered and any further developments will be left to the market.	
16.26	What is the expected timescale and rate of development and is this realistic?	Haverigg Industrial Estate is an existing employment site that is already largely delivered. Further development is likely to be small scale, incremental and dependent on the local market.	

ES14 Seascale Rural Workshops		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	Seascale Rural Workshops are an existing employment site and allocation in the Copeland Local Plan via Saved Policy EMP1 (site ref. E21).
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site with undeveloped land allocated for employment use as an extension to the site. There are no recent planning applications at this site.
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site. The allocation is historic, and its scale is limited by the undeveloped area of 0.7ha.?
16.22	<ul> <li>What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc.</li> <li>Would policy safeguards and proposed mitigation be sufficiently effective?</li> </ul>	<ul> <li>Seascale Rural Workshops is fully developed on one side of the access road, and completely undeveloped on the other.</li> <li>It is situated in Flood Risk Zone 1, with the SFRA recommending that development can take place subject a site specific Flood Risk Assessment.</li> <li>The site is in a potential area for natterjack toads and the site will require phase 1 habitats survey</li> </ul>
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	Seascale Rural Workshops are an existing employment site, half of which is developed to capacity, and it is not expected that the likely scale of development would require significant infrastructure to unlock it. The Transport Improvement Study (EB23 Section 9) identified that if the site was fully built out the site should contribute toward s providing a pedestrian crossing on Gosforth Road to footway on east side of the carriageway
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Seascale Rural Workshops are an existing employment site that is already largely delivered together with an allocation of a similar size that is still to be developed. The site's proximity to Sellafield will make it an attractive location for businesses linked to Sellafield's supply chain and existing occupiers who may wish to expand.
16.25	How is it intended to bring the site forward for development? What mechanisms will there be to	It is intended to leave the site's further development to the market as no significant intervention or infrastructure should be required to develop the remainder of the site. The

ES14 Seascale Rural Workshops		
	ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	purpose of the additional allocation is to provide the range and choice if/when the growth projects in and around Sellafield, Moorside, the Clean Energy Park take place.
16.26	What is the expected timescale and rate of development and is this realistic?	This will depend somewhat on decisions around Sellafield, Moorside and the Clean Energy Park.

ES10 E	ES10 Energy Coast Business Park, Haile		
16.19	What is the background to the site allocation? How was it identified and which options were considered?	The Energy Coast Business Park is an existing employment site, which was developed on the site of a former open cast mine and therefore has an open countryside location. Its extents are defined by that former use and the proposed allocation is to formerly recognise the employment use it now provides, while also preventing significant growth and sprawl into the open countryside.	
16.20	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As outlined above, the site is currently an existing employment site. Recent planning applications include: 4/21/9002/0F2: Erection of 2.2m Fencing To Existing Recycling Yard and Adjacent Areas to be used for reclaimed material storage	
		4/19/2255/0F1: (Retrospective) Change of Use of former mine yard for the storage of plant and equipment with fencing to compound	
16.21	What is the basis for the scale and mix of uses proposed? Is this justified?	The proposed mix of uses is a continuation of the extant usage of the site.	
16.22	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The Energy Coast Business Park is an existing employment site with full road infrastructure and is largely developed.</li> <li>It is situated in Flood Risk Zone 1, and the SFRA recommend that development can take place subject a site specific Flood Risk Assessment.</li> </ul>	
16.23	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	Energy Coast Business Park is an existing employment site which is largely developed to capacity. It is not expected that further development would require significant infrastructure.	
16.24	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The Energy Coast Business Park is an existing employment site that is already largely delivered and covers the extents of the former open cast mine.	
ES10 E	ES10 Energy Coast Business Park, Haile		
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16.25	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave any development of this site to the market.	
16.26	What is the expected timescale and rate of development and is this realistic?	The Energy Coast Business Park is an existing employment site that is already largely developed.	

## Appendix **B**

The following tables provide responses to Questions 16.28 to 16.35 for each of the Opportunity Sites identified in the Copeland Local Plan 2021-2038 Publication Draft as follows:

- OWH01 Old Dawnfresh Factory, Whitehaven
- OWH02 Jacksons Timber Yard, Whitehaven
- OWH03 Preston St Garage, Whitehaven
- OWH04 BT Depot, Whitehaven
- OWH05 Land at Ginns, Whitehaven
- OWH06 Land at Coach Road, Whitehaven
- OWH07 Marlborough Street, Whitehaven
- OWH08 Pow Beck, Whitehaven
- OWH09 Car Park Quay Street East, Whitehaven
- OWH10 Quay Street West, Whitehaven
- OWH11 Mark House and Park Nightclub, Whitehaven
- OWH12 Former Bus Garage, Bransty Row, Whitehaven
- OWH13 Marchon South, Whitehaven
- OCLO1 Cleator Mills, Cleator
- OEG01 Chapel Street, Egremont
- OEG02 Former Red Lion PH, Main Street, Egremont
- OEG03 East Road Garage, Egremont
- OMI01 Millom Pier, Millom

OWHO	OWH01 - Old Dawnfresh Factory, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is located on the former Dawnfresh Seafoods factory, and is currently allocated as an Employment Opportunity Site (ref. WEOS1) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.	
		The site has been allocated for a number of years, initially to help the expansion/diversification of that business, and more recently part of it was developed as a boat building and repair facility following planning permission in 2007 resulting in the smaller remaining allocation.	
		The site has most recently been proposed as a multi storey car park as part of BEC's wider North Shore regeneration: <u>https://becnorthshore.com</u> (which could support a parking strategy for the town by reducing the number of cars entering the town centre/one way system, and also enable some existing car parks to be freed up for development).	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As above. The status of Opportunity Site highlights its priority for development and regeneration. Following the closure of the seafood factory the site was proposed to be incorporated into an enlarged Tesco supermarket, by adding it to the exiting superstore's plot. No development took place.	
		Since then the site has gained approval as a temporary car park (4/16/2018/0F1), and has been considered for a multi storey car park which could support a wider parking strategy for Whitehaven.	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site on the edge of the town centre, but with the harbourside location and close to one of the major road accesses into Whitehaven, it could lend itself to a range of uses, including multi storey car park.	
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is located in Flood Risk Zone 1/2, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The site is located within an area of potential for the Small Blue Butterfly and the site will require phase 1 habitats survey</li> </ul>	

OWHO	WH01 - Old Dawnfresh Factory, Whitehaven	
		<ul> <li>The Heritage Impact Assessment (EB27 page 37) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>Access to this part of the harbourside has been improved recently through the completion of Bransty Junction highway remodelling, traffic lights/pedestrian crossings and public realm works: https://discoverbec.com/highways-improvements/. And while there should not be the need for any further significant infrastructure to deliver the site, the Transport Improvement Study (EB23 Section 9) identified the following schemes that this site could contribute towards: <ul> <li>Widen the western footway and extend to integrate with the site</li> <li>Improvements to the A595/New Road junction</li> <li>Improvements to the A595/Inkerman Terrace and A595/Ribton Moorside junctions</li> <li>Improvements to Homewood Road roundabout</li> </ul> </li> <li>(It should be noted that these are based on the site being developed as a 700 space multi storey car park and alternative uses could have very different, and reduced, wider impacts)</li> </ul>
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The site is owned by BEC, who are considering the most appropriate options for this site, with a multi storey car park being proposed as part of a wider 'North Shore' redevelopment, which also incorporates other Opportunity Sites: <u>https://becnorthshore.com</u> It is also an option to help deliver the AI and robotics growth projects identified in the EDNA.
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	As above. BEC are a regeneration company (owned by the Nuclear Decommissioning Authority, Copeland and Allerdale borough councils and Cumbria County Council) who work with end users to develop regeneration projects.

OWH01	- Old Dawnfresh Factory, Whitehaven	
16.35	What is the expected timescale and rate of development and is this realistic?	At present the likely timescale in within the first five years of the Plan period.

OWHO	OWH02 - Jacksons Timber Yard, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. WEOS2) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3. The site is identified as its redevelopment could create improved east/west linkages	
		across the town as well as support uses more suited to a town centre location.	
		It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The site is currently an active business. There have been no recent planning applications related to the site, and any redevelopment would only take place if and when a suitable site in Copeland has been found for the current business to relocate to.	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses, but employment uses may be preferred.	
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is currently an active business with access from Howgill Street.</li> <li>The site is located in Flood Risk Zone 2, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 39) assesses the potential impact as 2 and that 'attention to heritage is required'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> </ul>	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>While there should not be the need for any significant infrastructure to deliver the site, the Transport Improvement Study (EB23 Section 9) identified the following scheme that this site could contribute towards:</li> <li>Provision of off-road segregated cycle infrastructure</li> </ul>	
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	We are aware that there has been developer interest in this site, and it is understood that an option agreement has been discussed in the past.	

OWH02 - Jacksons Timber Yard, Whitehaven		
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave delivery of this site to the market in the short term, as the site is currently in beneficial active use and other sites are a greater priority in the town.
16.35	What is the expected timescale and rate of development and is this realistic?	Longer term site, and its delivery will depend on the existing business relocating elsewhere in the borough.

OWH03 - Preston St Garage, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. WEOS3) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.
		It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The northern portion of the site gained approval for a modular unit associated with Enterprise Rent-a-Car in 2018 (4/18/2281/0F1) which has been developed.
		The southern portion includes a number of existing businesses and has not had any recent planning applications.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses, but employment uses would be preferred.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation,	The site can be accessed directly from Preston Street. The site is located in Flood Risk Zone 1, and the SFRA recommends that development
	landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation	can take place subject a site specific Flood Risk Assessment.
	be sufficiently effective?	The Heritage Impact Assessment (EB27 page 41) assesses the potential impact as 2 and that 'attention to heritage is required'.
		This site may require a Stage 1 habitat assessment to ensure sustainable development.
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>While there should not be the need for any significant infrastructure to deliver the site, the Transport Improvement Study (EB23 Section 9) identified the following scheme that this site could contribute towards:         <ul> <li>Provision of off-road segregated cycle infrastructure</li> </ul> </li> </ul>

OWHO	OWH03 - Preston St Garage, Whitehaven		
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Development could take place during the Plan period, but it is currently not a priority site among the Opportunity Sites.	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave delivery of this site to the market in the short term, as the site is currently in beneficial active use and other sites are a greater priority in the town.	
16.35	What is the expected timescale and rate of development and is this realistic?	Longer term site, and its delivery will depend on the existing business relocating elsewhere in the borough.	

OWHO	OWH04 - BT Depot, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. WEOS4) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3. It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The site is currently in active use and there has been little recent planning history. The only recent approval was to demolish an existing building on part of the site to create a private car park (4/19/2383/0F1).	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses, but employment uses would be preferred.	
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is currently in active use with access from Preston Street and also the potential to access from Cart Road.</li> <li>The site is located in Flood Risk Zone 1, and the SFRA recommends that development can take place subject to suitable consultation with the Local Planning Authority and the Lead Local Flood Authority'.</li> <li>The Heritage Impact Assessment (EB27 page 39) assesses the potential impact as 2 and that 'attention to heritage is required'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> </ul>	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>While there should not be the need for any significant infrastructure to deliver the site, the Transport Improvement Study (EB23 Section 9) identified the following scheme that this site could contribute towards:</li> <li>Provision of off-road segregated cycle infrastructure</li> </ul>	
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Development could take place during the Plan period, but it is currently not a priority site among the Opportunity Sites.	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to	It is intended to leave delivery of this site to the market in the short term, as the site is currently in beneficial active use and other sites are a greater priority in the town.	

OWH04 - BT Depot, Whitehaven		
	ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	
16.35	What is the expected timescale and rate of development and is this realistic?	Longer term site, and its delivery will depend on the existing business relocating elsewhere in the borough.

OWHO	OWH05 - Land at Ginns, Whitehaven	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. WEOS5) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.
		It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	As it is such a large site there is a complex and varied planning history. A portion of the site is made up of private residential properties.
		The whole site was subject to a planning application in 2006 for a superstore with petrol filling station (4/06/2686), which was withdrawn in 2008.
		The northern portion of the site has approval as a temporary car park (4/17/2248/0F1 and 4/21/2474/0F1)
		Part of the site which was a former Council depot gained planning permission for a temporary car park in 2019 (4/19/2120/0F1) and very recently an application has been submitted for 41 dwellings (4/22/2466/0F1) on the south eastern portion of the site.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses and due to its size could support a mix of uses, including employment. It also has the potential to support a convenience retail development to meet the needs identified in the Retail Study (EB17 and EB18).
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed from both Preston Street and Coach Road.</li> <li>The site is mainly located in Flood Risk Zone 1, although the frontage along Coach Road lies within 3a, and the SFRA recommends that detailed consideration of site layout and design around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 42) assesses the potential impact as 2 and that 'attention to heritage is required'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> </ul>

OWHO	OWH05 - Land at Ginns, Whitehaven		
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to unlock the site. The site is currently in a number of different ownerships and as a result some elements may come forward at different times for different uses.	
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	the applications and enquiries demonstrate interest that should deliver at least part of the site in the shorter term	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave deliver to the market.	
16.35	What is the expected timescale and rate of development and is this realistic?	Development is expected to take place throughout the Plan period.	

OWH0	OWH06 - Land at Coach Road, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. WEOS6) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The only recent planning permission relates to a change of use from storage for a timber merchant to a Crossfit gym (4/17/2083/0F1) which has taken place.	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses.	
16.31	<ul> <li>What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?</li> </ul>	The site can be accessed from Coach Road via Woodstock Lane. The site is mainly located in Flood Risk Zone 3a, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment. This site may require a Stage 1 habitat assessment to ensure sustainable development.	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site, and the main issue that will need to be considered is the flood risk.	
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The site is in the ownership of a developer, who implemented the current use, and may wish to provide alternative/additional uses in the future.	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave development to the market.	
16.35	What is the expected timescale and rate of development and is this realistic?	The site may or may not have further redevelopment during the Plan period.	

OWHO	OWH07 - Marlborough Street, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site was identified as a development opportunity in the Whitehaven Town Centre and Harbourside Supplementary Planning Document and has also been considered through the SHLAA process. Part of the site is an existing business which would need to be relocated if the site is to be comprehensively redeveloped.	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	There is no recent planning history for the site.	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre and harbourside it is suitable for a range of potential uses, with preference for active ground floor uses to help generate footfall.	
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed directly from Marlborough Street.</li> <li>The site is located in Flood Risk Zone 3a, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 43) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>Potential impacts upon Solway Firth SPA through water quality (in combination) (New Appendix H/HRA) (CBC11).</li> <li>Requirement for site specific HRA at planning application stage that includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5)</li> </ul>	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site.	
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Development could take place during the Plan period, but it is currently not a priority site among the Opportunity Sites.	

OWHO	OWH07 - Marlborough Street, Whitehaven	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave delivery of this site to the market in the short term, as the site is currently in beneficial active use and other sites are a greater priority in the town.
16.35	What is the expected timescale and rate of development and is this realistic?	Longer term site, and its delivery will depend on the existing business relocating elsewhere in the borough.

OWHO	OWH08 - Pow Beck, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. EOS2) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.	
		The site currently has a number of uses clustered in the north and along Meadow View, as well as a large radio transmitter.	
		It was proposed as an Associated Development site to support the construction workforce associated with developing Moorside nuclear power station when NuGeneration Ltd were developing their project. This would have brought t into an effective short term use during construction while leaving a positive legacy for the town once construction had ended and it was no longer required to house the construction workers.	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	There are no recent relevant planning applications or permissions.	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	This is a complex site, and its primary role would be to support the delivery of a major (Nationally Significant Infrastructure Project) development. See response to 16.28 above for further details.	
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed directly from Coach Road via Pottery Road.</li> <li>The site is located in Flood Risk Zone 2 and 3a, and the SFRA recommends considering withdrawal (if development cannot be directed away from areas of risk). The work undertaken by Nugeneration Ltd suggested this could be achieved, but is only really likely to be possible through the comprehensive development of the site such as for a workers accommodation Associated Development site. Therefore the site's proposed retention as an Opportunity Site is primarily to support the delivery of a major (Nationally Significant Infrastructure Project) development, if required.</li> <li>The Heritage Impact Assessment (EB27 page 41) assesses the potential impact as 1 and that 'consideration of heritage may be required'.</li> </ul>	

OWHO	OWH08 - Pow Beck, Whitehaven		
		This site may require a Stage 1 habitat assessment to ensure sustainable development.	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>This is a complex site and will need to consider many issues including, topography, flood risk and drainage, relocating existing businesses if required, and the radio transmitter. This is why its role to support a NSIP type project is the only likely way the site will come forward, or be required for development at this time.</li> <li>In addition, the Transport Improvement Study (EB23 Section 9) also identifies contributions towards: <ul> <li>Junction improvements at Preston Street/Coach Road</li> <li>Improvements to Meadow View</li> </ul> </li> </ul>	
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Yes, to support any major NSIP Associated Development.	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	An NSIP developer	
16.35	What is the expected timescale and rate of development and is this realistic?	Development is dependent on Government decisions re Moorside.	

OWHO	9 - Car Park Quay Street East, Whitehaven	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site was considered through the SHLAA process.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The site is currently a car par and has no recent planning history.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre and harbourside it is suitable for a range of potential uses, with preference for active ground floor uses to help generate footfall.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is located in Flood Risk Zone 3a, and the SFRA recommends that detailed consideration of site layout and design around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 48) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>The site is located in a Small Blue Butterfly potential area and a phase 1 habitat assessment will be required</li> <li>Potential impacts upon Solway Firth SPA through water quality (in combination) (New Appendix H/HRA) (CBC11).</li> <li>Requirement for site specific HRA at planning application stage that includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5)</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site.
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Development could take place during the Plan period, but it is currently not a priority site among the Opportunity Sites.
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to	It is intended to leave delivery of this site to the market in the short term, as the site is currently in beneficial active use and other sites are a greater priority in the town.

OWH09 - Car Park Quay Street East, Whitehaven		
	ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	
16.35	What is the expected timescale and rate of development and is this realistic?	Longer term site, and its delivery will depend on the existing business relocating elsewhere in the borough.

OWH1	OWH10 - Quay Street West, Whitehaven		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as a Town Centre Opportunity Site (ref. WTC1) in the Copeland Local Plan 2013-2028, as part of saved policy TCN12. It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The site is currently a car par and has no recent planning history.	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre and harbourside it is suitable for a range of potential uses, with preference for active ground floor uses to help generate footfall.	
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is located in Flood Risk Zone 3a, and the SFRA recommends that detailed consideration of site layout and design around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 49) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>The site is located in a Small Blue Butterfly Potential Area and will require a phase 1 habitats assessment</li> <li>Potential impacts upon Solway Firth SPA through water quality (in combination) (New Appendix H/HRA) (CBC11).</li> <li>Requirement for site specific HRA at planning application stage that includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5)</li> </ul>	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site.	

OWH1	OWH10 - Quay Street West, Whitehaven		
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Development could take place during the Plan period, but it is currently not a priority site among the Opportunity Sites.	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave delivery of this site to the market in the short term, as the site is currently in beneficial active use and other sites are a greater priority in the town.	
16.35	What is the expected timescale and rate of development and is this realistic?	Longer term site, and its delivery will depend on the existing business relocating elsewhere in the borough.	

OWH1	OWH11 - Mark House and Park Nightclub, Whitehaven	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as a Town Centre Opportunity Site (ref. WTC2) in the Copeland Local Plan 2013-2028, as part of saved policy TCN12. It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The site gained permission for demolition of the former Mark House building and creation of a temporary car park (4/15/2526/0F1).
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre and harbourside it is suitable for a range of potential uses, with preference for active ground floor uses to help generate footfall.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed directly from Strand Street.</li> <li>The site is located in Flood Risk Zone 2, with half of the site also in 3a, and the SFRA recommends that detailed consideration of site design and layout around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 53) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>Potential impacts upon Solway Firth SPA through water quality (in combination) (New Appendix H/HRA) (CBC11).</li> <li>Requirement for site specific HRA at planning application stage that includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5)</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There are no significant infrastructure costs required to unlock the site.

OWH1	OWH11 - Mark House and Park Nightclub, Whitehaven		
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	BEC own the site and are in discussions with potential end users	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	BEC are a regeneration company (owned by the Nuclear Decommissioning Authority, Copeland and Allerdale borough councils and Cumbria County Council) who work with end users to develop regeneration projects.	
16.35	What is the expected timescale and rate of development and is this realistic?	At present the likely timescale in within the first five years of the Plan period.	

OWH1	OWH12 - Former Bus Garage, Bransty Row, Whitehaven	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as a Town Centre Opportunity Site (ref. WTC4) in the Copeland Local Plan 2013-2028, as part of saved policy TCN12. It also features in the Whitehaven Town Centre and Harbourside Supplementary Planning Document, which provides some development guidelines for any future proposals.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	An outline application for a hotel (4/16/2241/001) was made and subsequently withdrawn in 2017. Prior to that there had been outline permission for 62 apartments and commercial use on the ground floor in 2009.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed from North Shore Road.</li> <li>The site is located in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 57) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>Potential impacts upon Solway Firth SPA through water quality (in combination) (New Appendix H/HRA) (CBC11).</li> <li>Requirement for site specific HRA at planning application stage that includes a Construction Environmental Management Plan and Drainage Strategy at planning application stage (new appendix H – see modification MI-APP5)</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site, but it is a prominent gateway site for the town so careful design and scale/massing will be very important.
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	BEC own the site and are in discussions with potential end users

OWH1	OWH12 - Former Bus Garage, Bransty Row, Whitehaven	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	BEC are a regeneration company (owned by the Nuclear Decommissioning Authority, Copeland and Allerdale borough councils and Cumbria County Council) who work with end users to develop regeneration projects.
16.35	What is the expected timescale and rate of development and is this realistic?	At present the likely timescale in within the first five years of the Plan period.

OWH1	OWH13 - Marchon South, Whitehaven	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The whole of the former Marchon factory site is currently allocated as an Employment Opportunity Site (ref. EOS1) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.
		The site was the focus of a Supplementary Planning Document (West Whitehaven SPD) which reached Issues and Options stage in 2013.
		Work on this ceased when West Cumbria Mining became interested in the southern portion of the site. They submitted a planning application in 2017 (ref. 4/17/9007) for a new coal mine 'Woodhouse Colliery'. The northern section of the former Marchon site is a proposed housing allocation in the Plan (HWH5).
		Following the delays in a decision on the coal mine from the Secretary of State the Council decided to include the southern section as an Opportunity Site to ensure there was a focus on a productive and positive future for the site if planning permission was refused.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	Planning permission for the Woodhouse Colliery was granted by the Secretary of State in December 2022.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	Initial thoughts were outlined in the West Whitehaven Issues and Options paper, but this was superseded following interest in the coal mine. At present it is still assumed that West Cumbria Mining's proposals are deliverable and will be developed now approval has been granted. If the mine does not proceed a review of options and potential uses would need to take place, including integrating with housing on the northern portion of the Marchon site allocation (HWH5).
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk	The issues are identified in planning application 4/17/9007, although they extent of impacts etc. would change and vary depending on any future proposal (if the mine does not proceed).

OWH1	OWH13 - Marchon South, Whitehaven	
	etc. Would policy safeguards and proposed mitigation be sufficiently effective?	
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	These are considered in planning application 4/17/9007.
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	At present it is still assumed that West Cumbria Mining's proposals are deliverable and will be developed now approval has been granted.
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	West Cumbria Mining's implementation of planning application ref. 4/17/9007.
16.35	What is the expected timescale and rate of development and is this realistic?	As outlined in planning application ref. 4/17/9007. It will take a number of years before the site is operational as it will take time to discharge all the necessary conditions and develop the site

OCLO1	OCLO1 - Cleator Mills, Cleator		
16.28	What is the background to the site allocation? How was it identified and which options were considered?	<ul> <li>The site is in three main parts: <ul> <li>An historic mill building which has been empty and unused for many years but has historic value and value to the local community. Other associated and adjacent buildings have been demolished in the past 5 years.</li> <li>A former Kangol factory, and subsequently factory shop outlet, which ceased trading approximately 10 years ago and has been demolished.</li> <li>A greenfield element which is currently allocated as an Employment Allocation (ref. E8) in the Copeland Local Plan 2013-2028, as part of saved policy EMP1. This allocation was to enable further development associated with Kangol when it was in operation.</li> </ul> </li> <li>In addition to this a piece of land currently outside the settlement boundary, but directly adjacent to the mill building, has also been included after it was proposed through the SHLAA process.</li> <li>The three main parts of the site were the subject of planning applications in 2014 which would have redeveloped the whole site and brought an element of housing onto the Employment allocation. These were approved by the Council, but issues around improving flood defences and the potential impact on the River Ehen SAC/SSSI meant that development has not taken place.</li> <li>Due to the planning history and complex nature of the site and its delivery, as well as three different landowners, the Council believes the most pragmatic way to make best use of the space is to bring all of these parcels of land together and consider the opportunities, impacts, infrastructure, design etc. as a whole rather than the piecemeal approach which has been unsuccessful to date.</li> </ul>	
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	In addition to the above, relevant planning history includes: 4/14/2192/0F1 CONVERSION OF FORMER MILL TO PROVIDE OFFICE ACCOMMODATION (USE CLASS B1) AND CAFE/RESTAURANT	

OCLO1	DCLO1 - Cleator Mills, Cleator	
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?         What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>4/14/2480/001 OUTLINE APPLICATION FOR THE ERECTION OF OFFICES (USE CLASS B1)</li> <li>4/18/2312/0F1 CREATION OF 600 SPACE CAR PARK</li> <li>4/14/2190/001 OUTLINE APPLICATION FOR ERECTION OF 79 DWELLINGS AND</li> <li>ASSOCIATED INFRASTRUCTURE/LANDSCAPING</li> <li>4/20/2472/0F1 RESIDENTIAL DEVELOPMENT FOR 115 DWELLINGS</li> <li>The planning history of the site suggests it can support a range of uses as part of a mixed development, and the Opportunity Site status should provide a framework to help their effective delivery.</li> <li>The site already benefits from an access off the A5086, and the Site Access Assessment (EB24) identified an additional location for a separate access for any residential development within the site.</li> <li>The site is located in Flood Risk Zone 3a, and the SFRA recommends that an Exception Test is required. The Council is commissioning a Level 2 SFRA for this site to better understand the implications and opportunities for different developments and how things can best be brought together.</li> <li>The Heritage Impact Assessment (EB27 page 33) assesses the potential impact as 2 and that 'attention to heritage is required'.</li> <li>This is may require a Stage 1 habitat assessment to ensure sustainable development.</li> <li>Potential impacts upon River Ehen SAC water quality (New Appendix H/HRA) (CBC11)</li> <li>Requirement for site specific HRA at planning application stage that will include a Construction Environmental Management Plan and Drainage Strategy (new</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to	appendix H – see modification MI-APP5) There should not be a need for any significant infrastructure to access the site, with the main issues and costs being managing flood risk, improving flood defences and

OCLO1	OCLO1 - Cleator Mills, Cleator	
	development including those from nearby land uses/proposed developments? How could these be addressed?	<ul> <li>developing the site in a sensitive way that does not damage, but enhances the environmental qualities of the River Ehen SAC/SSSI.</li> <li>The current condition of the historic mill building, with this being the main focus for supporting development here, is also a key consideration.</li> <li>The Transport Improvement Study (EB23 Section 9) also identifies contributions towards surfacing improvements of footpath FP403013 as a result of developing the site.</li> </ul>
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The level of developer interest suggests the site could be viable for redevelopment.
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	Development may come forward through the market, but if not a comprehensive development brief/masterplan once the flooding and environmental impacts are better understood could help a business case for infrastructure funding to unlock the site.
16.35	What is the expected timescale and rate of development and is this realistic?	Probably medium term – ten years

OEG01	- Chapel Street, Egremont	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The site is currently allocated as an Employment Opportunity Site (ref. EEOS1) in the Copeland Local Plan 2013-2028, as part of saved policy EMP3.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The site's status in the Local Plan is explained in questions 16.28 above. And there are no recent relevant applications on this site.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed directly from Chapel Street.</li> <li>The site is located in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 34) assesses the potential impact as 2 and that 'attention to heritage is required'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> <li>Potential impacts upon River Ehen SAC water quality (New Appendix H/HRA) (CBC11)</li> <li>Requirement for site specific HRA at planning application stage that will include a Construction Environmental Management Plan and Drainage Strategy (new appendix H – see modification MI-APP5)</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site.
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	Copeland Borough Council owns part of the site (the car park) and there have been some enquiries about developing the site.

OEG01	OEG01 - Chapel Street, Egremont	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to largely leave development of the site to the market in the short term. The former Red Lion site is a greater priority for Egremont in the short term due to its prominence on Main Street.
16.35	What is the expected timescale and rate of development and is this realistic?	Likely to be medium term – ten years

OEG02	OEG02 - Former Red Lion PH, Main Street, Egremont	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	The former Red Lion public house and hotel was a prominent historic building on the main street of Egremont. After several years of being unoccupied the structure became unsafe and the building was recently demolished leaving a prominent vacant plot on the main street through the town. Identification as an Opportunity Site will help to give the focus, and guidance etc. to support the effective redevelopment of a key site for the town.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	The planning history all precedes the demolition of the building.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	As a site close to the edge of the town centre it is suitable for a range of potential uses.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed directly from Main Street and there is a car park to the rear of the site which is owned by the Council.</li> <li>The site is located in Flood Risk Zone 1, and the SFRA recommends that development can take place subject to suitable consultation with the Local Planning Authority and Lead Local Flood Authority.</li> <li>The Heritage Impact Assessment (EB27 page 34) assesses the potential impact as 4 and that 'accommodation for heritage is a likelihood'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site.
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The site is owned by Copeland Borough Council, who in partnership with BEC are developing a business case for funding to bring forward development on the site.

OEG02	OEG02 - Former Red Lion PH, Main Street, Egremont	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	BEC are a regeneration company (owned by the Nuclear Decommissioning Authority, Copeland and Allerdale borough councils and Cumbria County Council) who work with end users to develop regeneration projects.
16.35	What is the expected timescale and rate of development and is this realistic?	At present the likely timescale in within the first five years of the Plan period.

OEG03	- East Road Garage, Egremont	
16.28	What is the background to the site allocation? How was it identified and which options were considered?	This is a brownfield site in a very visible and prominent location from the A595 that would benefit from the additional focus and guidance that Opportunity Site status can bring.
16.29	What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?	There is no recent planning history, and the previous history was associated with the business at East Road Garage.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	Commercial and employment uses would be preferred on this site, but residential may be appropriate due to neighbouring properties on Wyndham Place
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site can be accessed directly from East Road or possibly Wyndham Place.</li> <li>The site is located in Flood Risk Zone 1, and the SFRA recommends that development can take place subject a site specific Flood Risk Assessment.</li> <li>The Heritage Impact Assessment (EB27 page 36) assesses the potential impact as 2 and that 'attention to heritage is required'.</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> <li>Potential impacts upon River Ehen SAC water quality (New Appendix H/HRA) (CBC11)</li> <li>Requirement for site specific HRA at planning application stage that will include a Construction Environmental Management Plan and Drainage Strategy (new appendix H – see modification MI-APP5)</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site. The previous use as a petrol filling station will require remediation of the site.
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The site is in a prominent location just off a major junction of the A595 and should be attractive to the market.

OEG03	OEG03 - East Road Garage, Egremont	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to largely leave development of the site to the market in the short term. The former Red Lion site is a greater priority for Egremont in the short term due to its prominence on Main Street.
16.35	What is the expected timescale and rate of development and is this realistic?	Likely to be short to medium term

OMI01 - Millom Pier, Millom		
16.28 16.29	<ul> <li>What is the background to the site allocation? How was it identified and which options were considered?</li> <li>What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?</li> </ul>	The site is currently allocated as an Employment Allocation (ref. E11) in the Copeland Local Plan 2013-2028, as part of saved policy EMP1. The site's status in the Local Plan is described above and there are no recent planning applications.
16.30	What is the basis for the scale and mix of uses proposed? Is this justified?	The site appears to be under utilised so it is considered that expanding the range of potential uses to include things like leisure uses could increase activity on the site, especially if Millom Town Fund projects such as the Iron Line are successful.
16.31	What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk etc. Would policy safeguards and proposed mitigation be sufficiently effective?	<ul> <li>The site is located in Flood Risk Zone 1, with a small element also in 3a, and the SFRA recommends that detailed consideration of site layout and design around flood risk will be required.</li> <li>The Heritage Impact Assessment (EB27 page 36) assesses the potential impact as 1 and that 'consideration of heritage may be required'.</li> <li>The site is located in an area known for natterjack toads and a phase 1 habitats assessment</li> <li>This site may require a Stage 1 habitat assessment to ensure sustainable development.</li> <li>Potential impacts upon National Site Network (NSN) sites through Coastal Squeeze (in combination) (New Appendix H/HRA) (CBC11)</li> <li>Requirement for project-specific HRA of the proposed development area and surrounding habitats to assess the likely loss of habitat through coastal squeeze, taking account of other plans and projects (new appendix H – see modification MI-APP5)</li> </ul>
16.32	What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How could these be addressed?	There should not be the need for any significant infrastructure to deliver the site.

OMI01 - Millom Pier, Millom			
16.33	Is the development proposed viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?	The widening of potential uses by changing the site to an Opportunity Site may stimulate further interest.	
16.34	How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?	It is intended to leave development to the market.	
16.35	What is the expected timescale and rate of development and is this realistic?	Further development may not happen in the Plan period, and that would be okay as the land is not required to (even though it could) meet employment needs	