

Matter 6: Employment Land Requirement, Supply and Distribution

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the employment land requirement, supply and distribution of employment.

Relevant Policies: SP Policy E1PU; Table 9; SP E2PU; E7PU

Employment land requirement (Table 9)

6.1 What specific evidence is available to support the employment land requirement of 39.9 ha for the period 2021-2038?

- 6.1.1 There are two main evidence base documents to support the Local Plan's requirement of 39.9ha of employment land and the supply to meet that need, over the period 2021 to 2038. These two documents are the 2021 Economic Development Needs Assessment (EDNA, EB15) and the 2021 Employment Land Availability Assessment (ELAS, EB16).
- 6.1.2 The EDNA provides an assessment of Copeland's economy, investigating the economic potential of the Borough and identifying realistic yet aspirational growth scenarios based on economic forecasts and modelled scenarios for the delivery of future growth. It then assesses the future quantum and type of employment land which will be required in Copeland over the Plan period to support the levels of identified growth. This planned approach to delivering future employment requirements will ensure communities in the Borough have access to jobs and the employment scenarios in this study have considered local needs and growth requirements. The executive summary of the EDNA (pages 6-12) provides an overview of the report.
- 6.1.3 Copeland is identified as a standalone Functional Economic Market Area (FEMA), as it has a high proportion of people living and working in Borough, ONS identify Copeland as a single travel to work area. The main economic links outside of Copeland are to neighbouring Allerdale, because of the employment land close to the administrative boundary, however in general, transport links with the rest of Cumbria are poor.
- 6.1.4 The review of Copeland's commercial property market (paragraph 0.16-0.18) showed that there is a very low (0.72%) industrial vacancy rate in Copeland, with historic net losses of industrial floorspace of 3,623 square metres. However, in the office market, there is a vacancy rate of 8.99%, slightly above the typical rate of 7.5%, with a recent net increase of 4,252 square metres of office space. If the past trends of employment land take up were used to estimate future need, there would be a total need of 9.39ha for 2021-2038.
- 6.1.5 The Economic Baseline and Future Economic Growth, plus Growth Scenarios were also considered, these are covered in detail in response to questions 6.2 and 6.3. The Risks of Brexit and Covid were also covered in the report and are covered in detail in response to question 6.8.
- 6.1.6 The employment land needs for Copeland are based upon job growth in those sectors of the economy which require E or B Class land use to grow, which is covered in detail in response to question 6.5.
- 6.1.7 The ELAS provides an assessment of employment land (use classes E (business), B2 and B8) to identify a suitable, available and achievable supply of land for economic development in Copeland. A total of 67 sites were assessed through the ELAS, coming from 3 main sources; draft employment

allocations, draft opportunity sites and sites identified by the Council from the Call for Sites process, which were potentially suitable and available for employment uses.

- 6.1.8 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. These recommendations were then subject to any further selection criteria by the Council, before sites were proposed as allocations in the emerging LP.
- 6.1.9 Of the 67 sites assessed, 17 are considered to be potentially suitable for allocation. 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).

6.2 What did the analysis of the economic baseline future jobs growth show?

- 6.2.1 The Economic Baseline of the EDNA (EB15 Section 5, pages 32 to 39) sets out the economy is strong in the nuclear and manufacturing sectors and in 2019 the borough had an estimated population of 68,183, supporting 35,900 jobs (BRES 2018). The GVA of Copeland's economy in 2019 was £1,656 million, which accounts of 14% of the total GVA in Cumbria. The GVA per head of population has grown in recent years, a level which is above the average for the rest of Cumbria and the North West, however it is still below the England average.
- 6.2.2 The largest employment sectors, by number of jobs, in Copeland are within Manufacturing (33.4%), Health (11.1%), Construction (6.9%) and the Professional, scientific, and technical services (6.9%). In addition to these three, a comparatively strong sector is Agriculture, Forestry and Fishing.
- 6.2.3 Jobs within the Manufacturing sector are predominantly located at Sellafield, which accounts for 83% of jobs in this sector, the professional, scientific and technical sector, business administrative and support services and the construction sector all have strong links to activities related to Sellafield and it's wider supply chain.
- 6.2.4 Section 7 (pages 58 to 68) of the EDNA (EB15) looked at Future Economic Growth for Copeland to 2038. 3 econometric forecasts; Cambridge Economics (CE), Oxford Econometrics (OE) and Experian were assessed. All three provided different conclusions to job growth in Copeland. This is set out in detail from paragraphs 7.5 to 7.24 of the EDNA, and in further detail through the section. Detailed analysis for the forecasts was carried out, this concluded that an adjustment was necessary for the forecasting of manufacturing jobs. In short, all 3 forecasts showed a decline in jobs, however, analysis showed that close to 100% of jobs in this sector are based at Sellafield. The stakeholder engagement showed that there were no plans for job losses there in foreseeable future, therefore the forecasts were inaccurate. This reduced the jobs losses in manufacturing to 0 (Experian) 900 (CE) and 1,400 (OE) up to 2038 as shown in Table 30. This does not take into consideration Sellafield off-siting, which is considered separately within the growth scenarios.

6.2.5 The conclusions to the analysis of the 3 forecasts is set out in paragraphs 7.55 to 7.60 of the EDNA (EB15). Here the OE forecast was discounted, as it provided a less suitable basis for positive planning, as detailed in Tables 26 and 27 of the EDNA, it showed a more negative outlook to the Copeland Economy across a wider range of sectors, than either CE or Experian. This resulted in two baseline scenarios, accounting for the adjustment to the manufacturing sector and macro-economic factors of Brexit and Covid (see Q 6.8), as set out in the table below.

Table 1: Baseline Scenarios 2021-2038

	Jobs Growth	Growth Rate
CE (manufacturing adjusted)	1,100	0.2%
Experian (manufacturing adjusted)	2,200	0.4%

Source: EDNA Table 31. Baseline Scenarios – Including Adjustments to Manufacturing, 2021-38

6.2.6 This shows that there is an expected baseline job growth in Copeland of between 1,100 and 2,200 between 2021 and 2038. However, as set out in the EDNA there are a series of transformative pipeline projects in Copeland, that need to be considered. If implemented these would have a significant impact on future job growth. This is explored in further detail in response to Q 6.3.

6.3 How were the five growth scenarios arrived at? What would the overall jobs growth be in the Borough for the period 2021-2038 were all five scenarios to come forward, combined with the economic baseline?

6.3.1 The growth scenarios were arrived following review of the key potential growth projects and growth strategies, including nuclear new build at Moorside, the Cumbria Nuclear Prospectus, Copeland Growth Strategy, and a new coal mine in Whitehaven and subsequent discussions with key stakeholders and promoters of these projects (e.g. Sellafield Ltd, EDF, UK-SMR, West Cumbria Mining, Cumbria LEP). Further details are outlined in question 6.4.

6.3.2 Section 8 of the EDNA (EB15), pages 69 to 86, set out the 5 growth scenarios in detail and concludes from paragraph 8.74 onwards the revised level of job growth in Copeland using an adjusted Experian baseline job growth.

6.3.3 Five growth scenarios have been developed which consider future policy interventions, initiatives, and pipeline projects which could see future economic growth in Copeland deviate away from the baseline forecasts. The scenarios considered are:

1. **Sellafield Off-Siting** – Sellafield is currently undergoing a process of rationalising its operational activity on site and relocating existing on-site workers to alternative locations. This will not impact on the number of workers but will impact on the demand for employment land in the borough beyond the Sellafield site. (paragraph 8.5 to 8.18)
2. **Increased capture of Sellafield’s supply chain** – a number of Council and LEP initiatives are aimed at increasing the level of jobs within Sellafield’s supply chain which are retained within Copeland. This scenario considers the impact these might have on job growth and employment land needs. (paragraph 8.19 to 8.36)
3. **Cumbria Clean Energy Park** – considering the employment impacts of the development of an energy hub around the Moorside site. This primarily focusses on the direct and indirect jobs arising during the construction phase of a large scale nuclear power station for the purposes of this study, although it is recognised that other opportunities exist on the Clean Energy Park. (paragraph 8.37 to 8.62)

- 4. **Woodhouse Colliery** – considering the employment impacts of the development of a new coal mine. Considers the direct and indirect jobs during the construction and operational phases. (paragraph 8.63 to 8.68)
- 5. **North Shore development** – this development is tied into the growth of a number of initiatives focussed around the development of a big data campus and/or AI cluster which could see growth beyond that seen historically in Copeland. (paragraph 8.69 to 8.73)

6.3.4 The analysis of each scenario considered a range of data and analysis to better understand the potential impacts and implications of each on economic growth in Copeland. The selection of these projects within the growth scenario was based on the projects which were identified by stakeholders to the Council as the most important to Copeland’s future economy. It was recognised that some of the projects may not come forward within the Plan period. As such each element of the Growth Scenario was provided separately.

6.3.5 The Experian baseline forecast (0.4% job growth) was used as the starting point for the Growth Scenarios (1-5). Cumulatively the job growth scenarios showed a growth of 4,923 jobs between 2021 and 2038. This is broken down for each of the 5 growth scenario projects, as per the table below. Combined this shows an annual rate of growth of 0.7% over the baseline Experian Forecast (0.4%), or a 1.1% level of growth per annum. When compared the previous 10 year period (2011 to 2021) which had a growth rate of 1.0% to 1.4% per annum, the annual 1.1% growth fits within that range and can therefore be considered realistic as levels of this growth have been recently experienced in Copeland.

Table 2: Employment Growth Scenarios – Job Growth 2021 to 2038

Project	Employment Growth 2021-38	Increase in Annual Growth Rate
Sellafield Off-Siting	No additional employment, 1,364 relocated	0%
Sellafield Supply Chain	2,762	0.4%
Clean Energy Park	3,123 at peak employment in 2035	0.6% pa to 2035
Woodhouse	1,038	0.2%
AI Campus	327	0.05%
All Growth Scenarios	4,923	0.7%

Source: Replicated EDNA Table 43. Employment Growth – Growth Scenarios 2021-38

6.3.6 It should be noted that a number of the projects require key investment decisions linked to Government decisions or direct Government decisions. Linked to this Woodhouse Colliery was granted planning permission by the Secretary of State in December 2022.

6.4 Are the economic growth assumptions upon which the proposed employment requirement is based deliverable? How do they compare to previous employment growth rates in the Borough?

6.4.1 As set out in response to Q 6.3, the cumulative job growth for scenarios 2021 to 2038, would be at an annual rate of 1.1%. This fits within the range of annual job growth rates experienced in Copeland between 2011 and 2021. Therefore it is realistic that similar rates are achievable over the plan period.

6.4.2 The growth scenarios were all identified as important projects for the future of Copeland's economy. Each scenario was considered in detail using evidence to support the assumptions in job growth made, and these are outlined below:

(1) Sellafield off-siting will occur through the Plan period, however whilst these are not new jobs, they will be in new locations and therefore create demand for new employment floorspace.

(2) Increased local capture of Sellafield's supply chain is an ambition for the Council and the LEP. A detailed study prepared by OE in 2017 set out how this would impact on job growth in Copeland. Growth in the supply chain sectors has been adjusted to reflect the level of growth, for that sector, in 2011 to 2021, this reflects a full economic cycle and the figures can be assumed to be realistic. This all results in an additional increase of 3,300 jobs in the main supply chain, or an annual growth of 0.8%. This level of growth is higher than the adjustment Experian Baseline for those sectors, but lower than the highest rates of 2011 to 2021.

(3) The Cumbria Clean Energy Park is led by two consortiums. EDF have proposed building a new nuclear power station comprising two EPR reactor units at Moorside – which are similar to Hinkley Point and Sizewell C. UK SMR has proposed to develop a SMR, which has an £18m investment by the UK Government. It would also serve as a testing ground for prototype AMRs, which would reuse existing nuclear material from Sellafield. The growth impacts of this scenario were developed by engaging with EDF, the Nuclear Decommissioning Authority, Copeland Borough Council ED officers, the LEP, EKSMR. The National Nuclear Laboratory were invited to contribute, but did not take part. To estimate job growth for the EPR reactors, comparison developments were analysed. For the SMR and AMR technology, as it is without precedent, this is more difficult. So an alternative approach was devised, by using land use requirements for the operation DAC, SMR and AMR developments and using this to identify an indicative number of jobs that could be created. Advice given to the Council was to remain flexible for these land uses and engage with the two consortium as their requirements develop, as to refine the employment needs arising from this particular element of this growth scenario.

(4) In the EDNA the then current planning status of the Woodhouse Colliery was set out. Within the planning application, EIA and further analysis to inform the Secretary of State's decision, details of job growth were given. However, further refinement was necessary as it did not set out how this would impact on the Copeland economy, only the benefit to the UK economy. Of the 2,000 jobs arising, a total of 1,038 jobs would be supported by a fully operational colliery.

(5) The AI Campus scenario is tied to the development of big data campus and or AI clusters which would see growth beyond that historically seen in Copeland. There is some overlap between this scenario and others and this has been considered and excluded from this analysis as far as possible. This would see a total job growth of 327 jobs between 2021 and 2038 in the sectors identified in table 42 of the EDNA (page 84).

6.5 What assumptions have been used to convert employment growth forecasts to future employment land needs? Are these justified?

6.5.1 Section 10 (pages 108 to 121) of the EDNA sets out 3 Labour Demand approaches to calculating employment land needs. This approach is one such approach identified in the PPG. The first 2 labour demand scenarios are the CE and Experian forecasts with the adjustment set out in Section 7 of the EDNA applied. This showed a job growth of 1,100 and 2,200 for the CE and Experian

forecasts respectively. The 3rd Labour Demand scenario, is that summarised in response to Q 6.3 and 6.4 above, this shows a job growth of 4,923.

6.5.2 The method to convert jobs into land requirements, is set out in Figure 44, page 111 of the EDNA. This shows an 8 step process to modelling employment land needs. Table 90, page 111, sets out the detail of these 8 steps, which are:

1. Total Employment Figure (growth)
2. Establish Full Time / Part Time Ratios
3. Identify Use Classes for each sector
4. Identify employment densities for those sectors
5. The plot ratios for development sites
6. Translate Net requirements to Gross requirements
7. Allow for a margin of flexibility
8. Giving a final total land need, broken down into E and B2/B8 use classes

6.5.3 The stages in Table 60 identify the wider evidence bases and justification for the assumptions used to arrive at the total land requirements for labour demand. In summary, this includes, BRES data, analysis of pre-Covid working trends, sectoral analysis using SIC4 BRES data, HCA Employment Density Guide 3rd edition, accounting for expected losses based on past trend data supplied by the Council, allowing for a margin of flexibility based on 5 years worth of past completion trend data. This is then translated into employment use classes.

6.5.4 Summarised within Tables 68, 69 and 70, the 3 labour demand scenarios have total land requirements of 1.5 ha (CE), 12.00 ha (Experian) and 27.9 ha (Cumulative total for Growth Scenarios). This would result in 39.9 ha when adding Experian and the Cumulative Growth scenarios together. No additional flexibility is included in the Growth Scenario option, as flexibility has already been factored into the CE and Experian baselines.

6.6 Forecasts based on past completion trends show an employment land requirement of 9.39 ha for the Plan period, compared to the proposed requirement of 39.9 ha. Bearing in mind past completion trends, is the proposed requirement of 39.9 ha realistic and deliverable?

6.6.1 As set out in response to Q 6.3 and 6.4, the proposed requirement of 39.9ha is based on the Growth Scenarios Labour Demand scenario. The inclusion of the 5 separate scenarios within this are robustly justified within the EDNA.

6.6.2 Paragraphs 81 to 85 of the NPPF set out how the Government is committed to supporting the economy stating that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*.

6.6.3 Paragraph 82 The NPPF goes on to state that policies set out within Local Plans should:

- a) *“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

*c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”*

6.6.4 Therefore, based upon the evidence within the EDNA the use of the past completion trend would not be justified. Firstly it is lower than the baseline level of forecasting and secondly it does not reflect business trends and wider stakeholder feedback on the economy of Copeland. The sectoral analysis and stakeholder engagement identified that future developments within Copeland would have an impact upon job growth. It is therefore justified, based on the evidence, to take a labour demand approach which reflects the growth scenarios identified through stakeholder engagement.

6.6.5 The response to Question 6.4 considers whether this is realistic and deliverable. However, attention should be drawn again to the NPPF, paragraph 81.

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴², and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

6.7 What is the basis for the proposed flexibility margin of 5 years of completion data?

6.7.1 As set out in response to Q 6.5, a margin of flexibility has been allowed for. Paragraph 82 of the NPPF requires policies to be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changes in economic circumstances.

6.7.2 Adding in a margin for flexibility reflects the following factors:

- To allow greater flexibility to support changing business needs;
- To provide a choice of sites to facilitate competition in the property market;
- To provide flexibility to allow for any delays in individual sites coming forward;
- The potential error margin associated with the forecasting process.

6.7.3 The size of the margin of flexibility depends on the location and local drivers of demand. Generally, a margin of between 2 and 5 years’ worth of completions is usually considered reasonable. One of the key findings of the stakeholder engagement is that a high level of flexibility of supply is required in order to be in a position to respond to emerging needs of both indigenous businesses and to continue to attract inward investment opportunities. Accordingly, we have calculated the margin of flexibility based on 5 years’ worth of completions.

6.7.4 Paragraphs 6.77 to 6.81 of the EDNA (EB15) consider the level of past completions in Copeland in detail.

6.8 How have other factors been taken into account? What do they show?

- 6.8.1 Factors which have been taken into consideration to reach the above outputs for land requirements, have been the economic impacts of Brexit and Covid-19 and considering how working patterns may alter following Covid-19. This is explored in further detail in Section 9 of the EDNA, pages 87 to 107.
- 6.8.2 Whilst the 3 econometric forecasts within the EDNA incorporate the implications of Brexit into their approach, there is no certainty over several aspects, including: UK trade deal with the EU, changes to EU migration and UK / EU trade of goods. Table 45 of EDNA sets out CE long term economic assumptions and impacts of Brexit by broad sector. The table identifies sectors with no impact and then ranging from mild, moderate and pronounced impacts. This is then translated to the Copeland experience in Table 46 identify which sectors are at a low, medium and high level of risk. It is concluded that the majority of existing jobs in Copeland were not at high risk due to any negative consequences of Brexit, as set out in Tables 47 and 48, therefore no adjustment was necessary for the EDNA. Wider stakeholder engagement did not identify Brexit as being a risk.
- 6.8.3 A similar exercise for Covid-19 economic impacts was also carried out, and concluded that there were few jobs at risk due to Covid-19, as set out in Tables 53 and 54 on page 99 of the EDNA.
- 6.8.4 Covid-19 brought about a large shift in the number of people working from home. This change in working practice could have a significant impact on the quantum of employment space required to support existing and future jobs growth. Paragraphs 9.45 to 9.78 explore how this may change over Copeland and what the impact may be on the need for land. This identified that it would be unlikely for the peak home-working levels of Covid-19 to be reached in Copeland by 2038 and that most office based business would return to a mix of working styles. This however would still require companies to retain an office base, which would inevitably change to suit more flexible styles of working. The implications of this are factored into the demand for employment land, as set out in paragraphs 10.12 to 10.19. The effect of this is to discount a proportion of workers from the analysis of employment land needs which in turn would reduce the floorspace required to facilitate a smaller number of jobs coming into the work place. This does not reduce the level of job growth, just the assumptions when modelling floorspace and land requirements. The higher levels of homeworking, per sector, that are forecast to be reached by 2038 are set out in Table 62, page 115.
- 6.9 In overall terms, is the employment requirement of 39.9 ha for the Plan period justified? Is there a basis to arrive at an alternative figure and if so what?**

- 6.9.1 As set out in responses to Questions 6.1 to 6.8 the employment needs of 39.9ha are justified in order to support growth and the potential from major developments in the borough. There is evidence to support lower levels of need, based only on the baseline econometric forecasting from CE and Experian, however neither of these forecasts would meet the requirements of paragraphs 81 and 82 of the NPPF.

Employment Land Supply

6.10 What is the estimated total supply of employment land in the Plan period overall? Do opportunity sites contribute to meeting the requirement or are they an additional source of supply?

- 6.10.1 The estimated total supply of employment land allocated over the plan period is approximately 48ha. This is comprised of:

- 6.4ha remaining at Westlakes Science and Technology Park
- 9.7ha on the two extension allocations to Westlakes Science and Technology Park (2.7ha and 7ha)
- 7.5ha of remaining land on Leconfield Industrial Estate
- 2ha on CMIQ Associated Growth Area 2 (which represents the land identified and currently in Copeland Council's ownership)
(Note: CMIQ Associated Growth Area 3 does not currently form part of the employment land supply)
- The remaining 22.4ha on the sites allocated in Policy H5PU

6.10.2 Some of the Opportunity Sites could contribute towards meeting the requirement, but the allocated employment sites should more than meet that need, and they are therefore considered an additional source of supply. The Opportunity Sites could come forward for a range of uses, including employment purposes, but are not guaranteed to come forward in any particular form or at all during the plan period.

6.11 What is the total supply of employment land (ha) from the following sources:

- Net completions since 2021 (base date of the Plan)**
- Sites under-construction**
- Planning permissions**
- Other commitments**
- Residual land on existing employment sites**
- Proposed employment land allocations for E(g), B2 and B8 uses**
- Westlakes and CMIQ**
- Opportunity sites**

- 587m² for "Redevelopment start up incubator hub with associated food & beverage",
- 1,734m² on three schemes (please see Appendix A for further details)
- Please see Appendix B for details
- None
- 22.4ha of undeveloped in employment allocations
- 48ha (comprising the figures from e) above and g) below
- Residual: Westlakes – 16.1ha. CMIQ (Areas 1 and 2) - 9.5ha.
- None specifically, but the Opportunity Sites identified as suitable for employment use in the ELAs could provide approximately 11.5ha of additional capacity, but in a number of cases employment may not be the preferred use even if it were suitable.

6.12 How will the sectoral employment land requirements set out in Economic Development Needs Assessment (EDNA) (2021) be met?

6.12.1 Four of the five scenarios within the Growth Scenario are very locationally specific and are linked to key project sites (such as Moorside or Woodhouse Colliery) and the key employment sites in the borough (i.e. Westlakes Science and Technology Park, Cleator Moor Innovation Quarter) and the main towns. The fifth scenario is Sellafield Supply Chain, which is not locational specific. Beyond these scenarios, no specific qualitative or locational recommendations were made in the EDNA. However, within the Commercial Market Signals (Section 6 of EDNA) the key economic locations were identified in the Borough. Most economic development is located to the North West of the borough with the A595 corridor from Calder Bridge, being the most attractive location for

commercial activity. Stakeholders identified a range of locations and particular reasons why this corridor in Copeland was particularly attractive, but principally it is due to the location of, and access to, Sellafield, Whitehaven, Cleator Moor, Westlakes Science and Technology Park and Lillyhall (in Allerdale) to the A595.

- 6.12.2 Cleator Moor and in particular Leconfield Industrial Estate was identified as a key location for future industrial development. The site has now been acquired by Copeland Borough Council and it is proposed that this will deliver the Industrial Solutions Hub (ISH) and an Energy Business Cluster in the borough (further details are in Matter 16; Questions 16.10-16.18). Westlakes Science and Technology Park is unique to the borough and would continue to act as the prime location for high-end engineering firms linked to the Sellafield supply chain and other growth scenario projects. Whitehaven would be the principal location for new office space development in the Borough.
- 6.12.3 The demand for employment land to the south is considered to be very limited to a very local market. Most employment is taken at Sellafield, or the wider supply chain to the north, or to Barrow in Furness which borders Copeland to the south.
- 6.12.4 The EDNA (EB15) outlines that non-office employment space is in high demand within Copeland; this is particularly true in the south of the borough, albeit other market signals highlight the demand for employment space along the A595 corridor. The Copeland Local Plan will secure these sectoral needs by ensuring the protection of extant employment land, flexible usage on employment allocations, and it will hasten the delivery of B2 and B8 land on the strategic site of Leconfield. Policy E7PU also provides protection to extant employment land from inappropriate redevelopment and changes of use.

6.13 Would the proposed employment land allocations fully meet the proposed requirement? If not, what is the extent of the shortfall?

- 6.13.1 The Copeland Local Plan has allocated approximately 50ha of employment land over the plan period. The EDNA (EB15) outlines that, to secure economic growth in accordance with the realisation of growth scenarios, it is necessary to allocate 39.9ha of employment land. Consequently, the Copeland Local Plan has provided a surplus of 10ha of employment land over what is required. This allows the Plan to support the approach of providing a high degree of flexibility regarding employment land to ensure economic development and growth.
- 6.13.2 If these allocations failed to come forward, although such a scenario is unlikely as most of the allocated land is residual within existing employment sites, the economic needs of the borough could be met through the delivery of opportunity sites. In total, the opportunity sites provide an additional 31.5ha of stopgap employment land; although, it should be noted that not all of this figure would be appropriate for employment usage.

6.14 Would the planned supply provide sufficient flexibility? How does the planned supply relate to past take-up rates?

- 6.14.1 The EDNA (EB15), identifies a very low vacancy rate in B2 and B8 floorspace in paragraph 6.56, which is expressive of insufficient flexibility of available floorspace. It goes on in Table 23 to outline the employment land needs based on past completion trends using completions from 2014 to 2020, which identifies a need of 9.39ha based on these past trends.

- 6.14.2 By providing sufficient land to meet the current forecast need from the growth scenarios, which is significantly higher than previous delivery rates, as well as retaining the existing employment sites as a focus for investment there should be sufficient range and choice for different sectors of the market to meet their needs across the borough. Retaining the existing employment sites across the borough as Employment Allocations should also offset the fact the a large proportion of the allocated employment land would otherwise be concentrated on two strategic sites (Westlakes Science and Technology Park and Leconfield/Cleator Moor Innovation Quarter).
- 6.14.3 In addition, the response provided in relation to Question 6.7 highlights the methodology and rationale that should guarantee sufficient flexibility in relation to flexibility of economic land.

6.15 Is Main Modification MA-LP56 necessary in the interests of soundness?

- 6.15.1 The Council believes Policy E5PU in the Publication Draft (CD1) to be sound and the proposed modification does not change that. However, this modification (MA-LP56) provides increased legibility for the policy and the Local Plan that it informs. In particular, the addition of the ELAS references for the employment allocations ensures that the Local Plan can be used efficiently in conjunction with the supporting evidence base, and especially the site profiles which can be a useful tool for investors and decision makers.

Economic Growth (Strategic Policy E1PU)

6.16 Does Policy E1PU provide an appropriate strategic framework for economic growth? Is the policy justified, effective and consistent with national policy?

- 6.16.1 Policy E1PU provides a positive framework and holistic strategic overview of the Local Plan's approach to economic growth in Copeland, and clearly articulates what the Plan promotes to support this growth. The criteria have been provided with local and regional specificity in regard to the economic opportunity that are present within Copeland and West Cumbria as part of a plan-led approach.
- 6.16.2 It provides a basis for the detailed policy framework in the remainder of the chapter, and particularly supports Chapter 6 of the NPPF, which outlines that Local Plans ought to plan in a manner that facilitates and encourages economic growth, which *"... is particularly important where Britain can be a global leader in driving innovation"* (Paragraph 81), and with *"special references to clusters or networks of knowledge and data-driven, creative or high technology industries"* (Paragraph 83), as well as the rural economy.

Location of Employment (Strategic Policy E2PU)

6.17 Is the proposed type and scale of development proposed in each of the settlement groups consistent with the development strategy?

- 6.17.1 The scale and type of development is broadly consistent with the development strategy as the table setting this out builds upon the hierarchy and strategy developed in Policy DS3, and most of the larger employment sites are located in the borough's main towns.

- 6.17.2 It is also however, written in such a way to recognise the historic location of employment sites, some of which do not neatly fit with the current settlement hierarchy in the Local Plan. These sites are Westlakes Science and Technology Park, which although close to Whitehaven is not technically settlement based, and Whitehaven Commercial Park which is located close to Whitehaven (in Moresby Parks).
- 6.17.3 The ELAS (EB16) tested 67 sites, which represented all potentially suitable and available options from existing sources and Calls for Sites, and the Council has broadly allocated employment land based on this evidence. Throughout the process the ELAS found there were limited opportunities in Whitehaven that could be allocated as new employment land for Whitehaven, with the main source being modest undeveloped sections of historic employment sites which are largely built-out.
- 6.17.3 Consequently, while the employment allocations do not perfectly align with the development strategy identified in Policy DS3, this is a necessary deviation that reflects the material constraints of development in Copeland. The recognition of employment allocations, within the policy is designed to maintain a planned approach which keeps a focus in the wider Whitehaven area.
- 6.18 Does the policy provide an effective framework to guide employment development to the most appropriate locations? Is the policy justified, effective and consistent with national policy?**
- 6.18.1 Policy E2PU builds upon the settlement hierarchy established in Strategic Policy DS3, and provides greater detail and clarity about the scale and types of employment developments that would be suitable in the different tiers in the hierarchy. It also recognises the role of existing employment sites, which may not completely fit within the new settlement hierarchy (such as Westlakes Science and Technology Park).
- 6.18.2 The NPPF outlines that an essential function of a Local Plan is to provide an effective framework to guide employment development to the most sustainable and appropriate locations¹. Policy E2PU provides a clear and efficient means through which the Copeland Local Plan will secure this. This policy has been informed by the Settlement Hierarchy and Development Strategy Paper (EB1) and Village Services Surveys (EB2), along with other site specific documents such as the ELAS (EB16), Strategic Flood Risk Assessment (EB3) and Settlement Landscape Character Assessment (EB35-EB37).
- 6.18.3 The policy also outlines potential impacts that would need to be considered and mitigation provided to enable that development to take place.

Safeguarding of Employment Sites (Policy E7PU)

- 6.19 Does Policy E7PU provide an effective framework to safeguard employment sites? Is the policy justified, effective and consistent with national policy?**
- 6.19.1 Policy E7PU seeks to safeguard land which is currently used for, has permission for or is allocated for, employment land uses, as defined in the policy wording. The Council considers this policy to be an effective approach to maintain a supply of employment land to meet identified needs. This recognises that the proposed employment allocations are to meet needs across the Plan period, and therefore may only be needed later in the Plan period, rather than immediately.

¹ NPPF (2021) Paragraphs 82 and 83.

- 6.19.2 The NPPF sets out at paragraph 81: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth.”*
- 6.19.3 The proposed policy will help ensure that these conditions are present in Copeland, without certainty in policy, investment can suffer. Therefore, by providing certainty over the future of employment land, through this policy, businesses should be confident to invest.
- 6.19.4 As set out in previous answers to this matter, Copeland has an ambitious but realistic employment need requirement and to achieve this, the land needs to be available throughout the plan period. It is the aim of this policy to ensure that availability.

6.20 Is proposed Main Modification MA-LP57 required in the interests of soundness?

- 6.20.1 Yes, the proposed modification provides greater clarity and precision to introduce the policy criteria which ensure that employment land is provided sufficient protection throughout the Plan period to meet future needs and support the growth scenario projects. This requirement is necessary in accordance with the principle of sustainable development in the NPPF.

Appendix A: Commencements

4/21/0067/3

Construction of 3No. Industrial Units

Swales Construction, Haverigg Industrial Estate, Cumbria, LA18 4NG

127m²

4/20/0098/3

Extension to existing factory

Tornado Wire Ltd, Devonshire Road Industrial Estate, Devonshire Road, Millom, LA18 4JS

620m²

4/21/0258/3

New Warehouse

Slacks, Borwick Rails, Millom, Cumbria, LA18 4JU

987m²

Appendix B: Permissions since April 2021

Ref	Date	Settlement	Address	Proposal	Use	Floorspace Change (m ²)
4/21/2083/0F1	21/04/2021	Distington	LAWSONS TRAINING CENTRE LTD, WHINBANK FARM	ERECTION OF EXTENSION OF EXISTING COVERED TRAINING AREA BUILDING	TRAINING CENTRE	+707
4/20/2230/0F1	30/04/2021	Whitehaven	LAND AT SNECKYEAT INDUSTRIAL ESTATE, HENSHNGHMAN	ERECTION OF TWO BUILDINGS TO PROVIDE NINE SELF CONTAINED INDUSTRIAL/COMMERCIAL UNITS TO BE USED IN A VARIETY OF B1, B2 & B3 USES, CAR PARKING, ACCESS AND ASSOCIATED WORKS	B1 OFFICE	+1,004
4/21/2121/0F1	17/05/2021	Millom	C P G LTD. MAINSGATE ROAD	PROPOSED EXTENSION OF THE SOUTH SIDE OF THE IVORY BUILDING TO PROVIDE FOR A NEW ENTRANCE/LOBBY AREA, OFFICE SPACE AND A NEW STAFF CAFETIRIA; NEW EXTERNAL SPIRAL STAIRCASE TO EASTERN ELEVATION; DRAINAGE WORKS, PROVISION OF AN ATTENILTATION POND WITHIN EASTERN FIELD	B1 OFFICE	+278
4/21/2231/0F1	01/09/2021	Whitehaven	HEWDEN PLANT HIRE, MEADOW ROAD	CHANGE OF USE OF CONTRACTORS PLANT HIRE DEPOT TO BUILDERS MERCHANTS (SUIT GENERIS) WITH ASSOCIATED OPERATIONAL DEVELOPMENT OF DEMOLITIONS AND ALTERATIONS	B2	-970

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Ref	Date	Settlement	Address	Proposal	Use	Floorspace Change (m ²)
4/21/2231/0F1	01/09/2021	Whitehaven	HEWDEN PLANT HIRE, MEADOW ROAD	CHANGE OF USE OF CONTRACTORS PLANT HIRE DEPOT TO BUILDERS MERCHANTS (SUI GENERIS) WITH ASSOCIATED OPERATIONAL DEVELOPMENT OF DEMOLITIONS AND ALTERATIONS	Sui Generis	+970
4/21/2233/0F1	05/10/2021	Whitehaven	SNEAKYET INDUSTRIAL ESTATE	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	B2, B8 and Classes E(g)(i), E(g)(II) and E(g)(iii)	+2,052
4/21/2365/0F1	24/11/2021	Whitehaven	6-8 DUKE STREET	ALTERATIONS/REFURBISHMENT AND CHANGE OF USE OF A CAVANT FORMER WHITTLES FURNITURE STORE TO FORM A COMMUNITY DIGITAL HUB AND CAFÉ INCLUDING THE CREATION OF A ROOF TERRACE	B1OFFICE	+678
4/21/2174/0F1	17/06/2021	Whitehaven	70 LOWTHER STREET	PRIOR APPROVAL FOR CHANGE OF USE FROM B1(a) OFFICES TO C3 RESIDENTIAL AT FIRST AND SECOND FLOOR LEVELS TO PROVIDE EIGHT CONTAINED FLATS	B1OFFICE	-235
4/21/2423/0F1	18/03/2022	Millom	UNIT 3, DEVONSHIRE ROAD INDUSTRIAL ESTATE	SITING OF TWO PORTACABINS	Sui Generis	+60

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Ref	Date	Settlement	Address	Proposal	Use	Floorspace Change (m ²)
4/21/2160/0F1	03/07/2021	Whitehaven	CUMBRIA STEELSTOCK LTD, WILLIAM PIT ROAD	ALLOW FLEXIBLE USES WITHIN CLASSES B2 (GENERAL INDUSTRIAL); AND/OR B8 (STORAGE/DISTRIBUTION) AND E(G(II AND III)) (COMMERCIAL, BUISNESS AND SERVICE)	E(g(ii) and E(g(iii))	+1,872
4/22/2121/0F1	25-May-22	Cleator	Unit 1a, The Flaxworks, Cleator	Change of use from office space to sui generis (dog training studio)	Office	-216
4/22/2121/0F1	25-May-22	Cleator	Unit 1a, The Flaxworks, Cleator	Change of use from office space to sui generis (dog training studio)	Sui Generis	+216
4/22/2146/0F1	31-May-22	Ponsonby	Newmill Farm, Ponsonby	Change Of Use From An Agricultural Storage Unit To A Car Repair Workshop (Retrospective)		+300
4/22/2213/0F1	06-Jul-22	Cleator Moor	20a-B Leconfield Industrial Estate, Cleator Moor	Works To Refurbish Existing Industrial Unit	B1c	+10
4/22/2161/0F1	04-Aug-22	Cleator Moor	Land At Leconfield Industrial Estate, Cleator Moor	Use of land as storage and distribution centre (class b8) for gas bottles together with the siting of two single storey prefabricated cabins for administrative use	B8	+60