

**COPELAND LOCAL DEVELOPMENT FRAMEWORK**

**EXAMINATION OF CORE STRATEGY AND DEVELOPMENT  
MANAGEMENT POLICIES**

**BOROUGH COUNCIL  
STATEMENTS:  
MATTER 5**

**ECONOMIC DEVELOPMENT**

**March 2013**



**5.1. Is the Council's approach to planning for the nuclear industry appropriate, flexible and deliverable?**

5.1.1 Planning with regard to the nuclear industry in Copeland has three dimensions.

5.1.2 First, there is **Sellafield**, which currently employs about a third of the Borough's workforce, though this can fluctuate;

- nuclear fuel reprocessing and high/intermediate level waste storage – a continuing operation which has the potential to increase substantially, depending on technological solutions for which there is demand;
- decommissioning, which is operating to a one hundred year programme and will, although the workforce may contract, employ thousands throughout the plan period;
- potential further operations currently under discussion, such as an prototype reactor proposed by Hitachi.
- The Nuclear Decommissioning Authority is also proceeding with the relocation of 'backroom' staff off site; Whitehaven will be a prime location and the first project, at Albion Square, expected to accommodate 1,000 staff, is now on site.

5.1.3 For security reasons the range of activity that can take place on the Sellafield site is increasingly limited. The future growth prospects at Sellafield (described in some detail in the Nuclear Topic paper Doc 6.1) require that there be a supply of land of suitable character and location to accommodate supply chain and other industrial activities ancillary to the operations on site.

5.1.4 New developments at Sellafield may also have implications for the housing market, but in view of the bulk of the workforce already being based in West Cumbria and any contract or short term labour generally overlapping with others who have vacated previous contracts, it is expected that the housing market can cope with any influx of permanent or long term residents resulting from new developments. (Note in this context that the base housing figure of 230 per annum is well above recent market performance.) This approach is supported by the projections analysed in the Projections Paper (Doc 6.6), which predict a muted impact of nuclear change on the labour force and housing demand. (The marginal figure can be obtained by subtracting the nuclear new build scenario in Figure 3.22, page 45, from Figure 3.33 'nuclear investment – nuclear new build plus Sellafield new developments – on page 56; in other words, only a few hundred extra workers.)

5.1.5 Secondly, there is the land adjoining Sellafield to the north is earmarked for the **Moorside nuclear power station**, on which planning work preparatory to a Development Consent Order is proceeding, leading to a construction period lasting from the late years of this decade well into the 2020s, and bringing a construction workforce of up to 5,000, with a permanent workforce of up to 1,000 when the power station is commissioned. The plan cannot and does not make any stipulations about this process, which will happen outwith the mainstream statutory planning system. However, its wider implications, especially on the land supply and on infrastructure, are a legitimate concern - those implications must be

planned for as far as possible. The Council considers it legitimate to take part in the major infrastructure planning process using its spatial planning strategy as a policy base underpinning the Local Impact Report and any representations made, which is why the Core Strategy refers to the development in the way that it does. There have been intensive discussions with representatives of NuGen to make sure that the tone and reach of the Core Strategy is appropriate and lawful.

- 5.1.6 The Moorside development is likely to require land for off-site associated activity, that is, part of the DCO application, or other related activities which might be applied for on behalf of Nugen, or by other companies carrying out work serving the needs of the development. We are aware of the precedent of Hinkley Point C, the DCO for which refers to a total of around 70 hectares for associated development alone – largely made up of off-site assembly and storage, vehicle handling (park and ride, lorry waiting, transshipment) and worker accommodation including training and conference facilities.
- 5.1.7 The impact of the Moorside project on housing provision in the Borough will be threefold:
- a large proportion will be accommodated in temporary ‘campus’ accommodation;
  - others will settle temporarily for varying periods of time, looking for a range of solutions ranging from bed and breakfast or lodging, through rental to those who may settle here in the short term and buy property;
  - the power station workforce is likely to represent a major boost to the resident workforce, living here permanently.
- 5.1.8 This is why the ‘aspirational’ figure of 300 dwellings per annum kicks in during the second quinquennium of the plan period and the housing trajectory peaks in the same period, with a figure raised above first phase levels continuing into the third phase. The overall addition is less than the total anticipated workforce figure because it is expected that a sizeable part of the permanent workforce will be recruited locally, and a proportion will live outside the Borough.
- 5.1.9 Moorside represents the part of the nuclear spectrum most likely to impact on infrastructure. This will be considered during the DCO process. The plan explicitly recognises that (Statement as Section 1.5). The Strategy for Infrastructure identifies solutions for aspects of the Borough’s infrastructure which may come under stress, but only for information, not as a policy position.
- 5.1.10 Third is the **Low Level Waste Repository at Drigg**. In planning terms this, as a waste operation, is primarily under the planning auspices of the County Council. It is a stable operation and, though not without planning implications, not in itself a major strategic concern.
- 5.1.11 **Is this approach appropriate?** The Borough Council believes that it is. Any reference, or plan content relevant, to the DCO process has been carefully drafted to make it clear that we recognise the legal and procedural boundaries involved. The plan has been discussed, constructively and amicably, in detail with representatives of Nugen, whose comments have

almost all been taken on board, and whose representations are not expressed as objections to its content. The Council submits that this demonstrates it to be appropriate.

5.1.12 **Is it flexible and deliverable?** The availability of land above projected demand gives the plan flexibility. There is further flexibility provided by other land possibilities not taken account of in this strategic stage of the plan, such as at Marchon (West Whitehaven, previously allocated in the 2006 Local Plan for a range of potential uses) and at Hensingham Common on the line of the Whitehaven Bypass on the east side of the town. All this land is potentially available for development. The same is true of the housing land supply, the SHLAA (Doc 7.3) demonstrating that there is a potential supply of land in excess of what the Core Strategy seeks.

*Note on the Geological High Level Waste Depository.*

5.2.13 This is a very controversial proposal, and for Allerdale and Copeland Borough Councils it remains on the agenda notwithstanding the County Council's rejection of a continued search. Beyond the reference at ER1B, this plan has not taken account of it for the following reasons:

- we would expect it to be a Nationally Significant Infrastructure Project dealt with via a DCO application;
- no proposal has been made regarding where it would be sited;
- it is not known when it will happen, whether it would be in the Borough, or whether it would happen at all;
- if it did happen, the detailed planning would almost certainly not be within the plan period.

**5.2. Has appropriate regard been had for the role of renewable energy in contributing to economic activity in Copeland?**

5.2.1 Looking at the 'low carbon' spectrum as a whole, Copeland has a substantial contribution to make via nuclear generation, and already does so through the support it provides for nuclear generation elsewhere via fuel reprocessing.

5.2.2 West Cumbria has been a focus of interest for some years for wind generation (onshore and offshore).

5.2.3 NPPF says, at paragraph 97: -

"To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources" and follows this with a list of criteria.

This of course should be read alongside the objective of 'protecting and enhancing valued landscapes' (para. 109).

5.2.4 The evidential background for planning policy governing renewable energy in Cumbria is provided by the ***Renewable Energy Capacity and Deployment Study***, a jointly supported piece of work carried out under the auspices of the County Council (2011, Doc. 6.2). 'Deployment Projections' forecast that 606MW (compared to 295MW already installed or in the 'pipeline' could realistically be deployed in Cumbria by 2030, based on technical capacity, except for wind energy where an assessment of landscape constraints produces a capacity ceiling of 1623MW, out of an estimated 'resource' of 2858MW.

5.2.5 Regarding commercial wind there is a projected deployment of 300MW, (considerably more than the 219MW predicted by a 'UK Renewable Strategy' scenario.)

5.2.6 Most capacity has been identified to be in Allerdale and Eden (70% of the total), reflecting openness of scenery, area outside protected landscapes, and potential for a variety of energy sources to be feasible.

5.2.7 For Copeland the projected capacity was calculated to be 46MW. In general Copeland is judged to have microgeneration capacity roughly in line with its share of the population, which gives a potential yield of up to 48.6 MW (Doc 6.2. pp.102-110) and this is encouraged by Policy DM11, though in practice the ability to deliver that will be compromised by development viability considerations – energy efficiency support by insulation (also encouraged by DM11) is a much more cost effective way of achieving carbon consumption reductions.

5.2.8 Waste-related generation is being pursued as part of the waste plan under the auspices of the County Council. The potential for biomass generation is restricted by landscape considerations and the relative remoteness of the Borough. Small scale hydro generation is restricted in potential by the size of Copeland's rivers, and more so by the proportion of them which are protected habitats.

- 5.2.9 Thus, apart from microgeneration, wind energy offers the most potential to meet the Borough's targets.
- 5.2.10 As of March 2011, operational commercial capacity in Copeland amounted to 20 turbines with a capacity of 16.9 megawatts.
- 5.2.11 Proposals currently at scoping or planning application stage (Weddicar Rigg in the Keekle Valley – refused, appeal submitted - and Langthwaite Farm, Wincham Hill and Haverigg Farm in South Copeland) total 53MW capacity.
- 5.2.12 The spirit in which wind turbine applications are dealt with in Copeland should be evaluated with reference to its environment. In particular, we note the stipulation of NPPF that local authorities should “design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts” (our stress). All of our jurisdiction, excepting a narrow coastal strip encompassing Whitehaven town, St Bees and the Head (Heritage Coast) and a coastal strip roughly bounded by the River Keekle, is within five miles of the Lake District National Park. We are thus within the setting of one of the most scenically valued areas in the world, and more than that, the most tranquil and unspoiled part of it.
- 5.2.13 This constrained and sensitive area is already under pressure with three wind farms in operation in the northern area, and another prominent in South Copeland (whose landscape is also impacted upon by wind farms on the opposite side of the Duddon Estuary. To this should be added the impact of offshore wind energy generation, which is visible from St Bees southwards and covers almost the entire of the horizon when viewed from much of the southern coast of the Borough.
- 5.2.14 It is therefore incumbent on the Borough Council to consider wind farm applications, especially on a commercial scale, with great care. Policies ER2 and DM2 reflect this, and represent an application of the principles expressed in the NPPF to local circumstances.
- 5.2.15 They are backed up by a Supplementary Planning Document (Doc. 3.1). This helps to fulfil the NPPF requirement that we should identify “suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources”. It was prepared and adopted jointly by the County Council and all the district councils, excepting Barrow, in 2007. Although its national policy underpinning is now defunct, the principles it expresses, to aid the determination of applications and to guide developers, remain valid and consistent with the NPPF. It contains a checklist of good practice for developers, guidelines for judging cumulative effects, with reference to specific landscape types and criteria for siting, and a landscape assessment identifying landscape capacity for different areas, compared to possible scales of development. This gives clear guidance intended to minimise conflict when developments are proposed. Again, the Borough Council would submit, this demonstrates a willingness to react as positively as possible in sensitive circumstances.

***Note on decentralised supply***

5.2.16 Policy DM11 on sustainable design includes a requirement for energy generating technology on site in developments of 10 or more dwellings or 1000m<sup>2</sup> floorspace. No further stipulation is made, for instance regarding target figures as in the 'Merton rule'. To do so in the context of advice that housing viability is marginal (Doc. 7.3.1) would not be feasible. In the case of commercial development, negotiation on this point in the development management process would focus on lifetime costs and the financial efficiency of buildings with low energy costs. (As an example, the consent for Albion Square includes BREEAM 'Excellent' standard – this is often a selling point in new commercial office developments.)

**5.3. Are there sound reasons for the Council maintaining a surplus of employment land or does this inhibit the introduction of alternative uses which could make more effective and efficient use of such sites?**

- 5.3.1 This issue is discussed in *Topic Paper 1* (Doc 1.6.1), especially Section 5, which includes an analysis based on *the Employment Land Review Update* (Doc 6.4). Doc 6.4 updates an earlier study (Doc 6.3, 2008, see below). It concludes that, in view of the potential for increased demand resulting from nuclear sector developments and their supply chain and other 'spin offs', it is sensible to maintain a supply of employment land which allows the flexibility to respond to that.
- 5.3.2 The conclusion (1.6.1 page 18), is that in Copeland's circumstances, with major development and concomitant 'spin off' development in prospect, it is sensible to regard the 'surplus' as a flexibility allowance. One should note that this allowance is after possible designation of two sites for alternative uses, one (Pow Beck) covered by an adopted Supplementary Planning Document (Doc 3.2), and possible 'de-allocation' of a further six sites. A decision on the status of, these, and possible alternative uses, will be made during the production of the Site Allocation DPD.
- 5.3.3 The *West Cumbria Employment Land and Premises Study* (ELPS, 2008, Doc 6.3) was undertaken by DTZ for Copeland and Allerdale jointly. The ELPS analysed every site in the West Cumbria supply and subjected them to a 'traffic light' analysis based on market attractiveness (pages 37/38). Fifteen of the 'red' sites are in Copeland. Of these, four – Jackson's Yard, Preston Street and Albion Square – are at the southern end of Whitehaven, with two now under development as the Albion Square offices, and the others offering potential for a range of uses appropriate to edge-of-centre location, as set out in the Energy Coast Master Plan and Core Strategy Whitehaven Locality section. Four more – Market Square (Cleator Moor), Devonshire Road and Mainsgate (Millom), and Cross Lane (Seascale) - are retained for reasons of 'local sustainability'. The remainder are recommended to be offered for alternative use, to be taken forward via 'de-allocation' in the site allocation process.
- 5.3.4 The Employment Land Review (ELR, 2012, Doc 6.4) was carried out by GVA as part of the Economic Blueprint production, to update the ELPS in the light of the changed macroeconomic situation. It endorses the conclusions of the ELPS with minor changes arising from the increased firmness of nuclear sector demand, recommending that Beckermat Industrial Estate no longer be considered for de-allocation and that Ginns Depot be allocated for B1a development. Overall the ELR notes that there is a surplus particularly of 'B2' land (Figure 7.3, page 77). However, it does not recommend de-allocation, rather a range of measures to increase the market attractiveness of sites.
- 5.3.5 Thus the supply has been reviewed, as the NPPF recommends. Both these studies endorse the desirability of maintaining a supply in excess of historic take-up rates, in order for West Cumbria to be able to respond to demand which is expected to arise from projected nuclear sector developments.



- 5.3.6 The Borough Council is not aware of any evidence which suggests there are more effective or efficient potential uses of any significant component of its current employment supply. Much of that supply is on existing employment locations (which does not in itself rule out alternative use; for example, the Leconfield Industrial Estate in Cleator Moor is under consideration in the SHLAA). Most of the supply is in beneficial locations in, on the edge of or close to the towns or Sellafield.
- 5.3.7 When considering the likelihood of this approach hindering development for alternative uses, the following factors might be taken into account:
- I. the SHLAA (Doc 7.3) indicates that there is a potential supply of suitable and available residential land which is more than sufficient to meet anticipated need and fulfil spatial strategy objectives;
  - II. there is a lack of interest from residential developers in identified, beneficially-located sites, let alone in sites which are not identified as housing land;
  - III. other than Leconfield, we are not aware of interest from developers interested in using allocated employment land for non-industrial uses.
- 5.3.8 This does not rule out the introduction of alternative uses. Applications for those will be treated on their merits in line with NPPF paragraph 22. This Council is not in the business of turning away unnecessarily any investment which will create jobs or improve its housing offer. Additionally, Policy ER4C mandates the site allocation process to identify sites which may be better suited to other uses.
- 5.3.9 The other directly relevant policy is, for development management purposes, DM3, which the Council submits is likewise compatible with NPPF para. 22 (see discussion under Issues 11.2 and 11.3).

**5.4. Should there be more recognition of heritage and tourism considerations in the Council's approach to economic development?**

- 5.4.1 In looking at the plan's approach to tourism and heritage, there are background factors that should be taken into account.
- 5.4.2 Firstly, the economy of Copeland is focused on a sector which is highly skilled and generally well paid. Whilst the economic development strategy in the 'Blueprint' is intended to foster diversification and is certainly not inimical to tourism, the prime direction of the regeneration strategy is to stress the potential for activity that capitalises and builds on the skill base associated with the nuclear sector. Business development may have spin off effects on the tourism sector, but alternatively, nuclear-focused growth might squeeze it out or even deter it.
- 5.4.3 Secondly, Copeland's heritage and potential, whilst valuable and very real, is inevitably overshadowed by the Lake District. That we are marketed under the banner of the 'Western Lakes' is hardly surprising. Whitehaven can certainly complement the Lake District, as the annual Festival shows, but the very attraction of the western lakes is that they are the most tranquil sector of the Lake District (and most of the existing resources are in the jurisdiction of the National Park).
- 5.4.4 It is therefore sensible to take an incremental and/or opportunistic approach in this sphere.
- 5.4.5 The plan includes the four Tourism Opportunity Sites (as originally designated by the 2006 Local Plan) at Lowca to the north of Whitehaven, Whitehaven Coastal Fringe, Hodbarrow by Millom and the Ehen/Keekle valleys in the countryside of the northern part of the Borough. The first three of these already have some degree of developer interest, which is likely to be of relatively low intensity in keeping with their coastal surroundings. (There is already caravan and chalet accommodation at Hodbarrow.) The Ehen and Keekle valleys have potential for development of outdoor activity complementary to the Lake District, and there is promoter interest in an 'extreme sports' centre in the Ehen valley near Cleator Moor.
- 5.4.6 Otherwise policy ER10 is generally permissive, with a stress on the towns in keeping with the spatial strategy, but also admitting development whose rationale requires rural location.
- 5.4.7 Not all of Copeland's built heritage, though of course we value it in its own right, ranks as enough of a draw to make a significant impact on economic development. The big asset is Whitehaven, and Policy ER8, backed up by the Town Centre and Harbourside SPD (Doc 3.3), is intended to make it possible to capitalise increasingly on its special qualities and the successful harbour regeneration, by providing a strategy to nurture and develop the aspects that make it attractive. Otherwise, the borough outwith the National Park does not offer any obvious avenues for a transformational change in its tourist and heritage 'offer', and the Borough Council considers it sensible to maintain a policy approach which will look to nurture the sector and encourage incremental growth. Cumbria Tourism supports this approach, although its response to the published plan (Representation S126) was couched in terms of general support.

## **5.5. Is sufficient direction provided in policies ER8, ER9 and ER10?**

- 5.5.1 The role of **policies ER8 and ER9** is to apply the higher level principles of ER7, which refers to the settlement hierarchy, to the specific character of different settlement within the hierarchy.
- 5.5.2 The reference to the settlement hierarchy continues the strand initiated by the spatial development strategy expressed in policy ST2 and the supporting text in Figure 3.2, which sets the scene as to how ST2 should apply to retail and services, employment and housing development in the different types of settlement.
- 5.5.3 Whitehaven stands out from the rest by virtue of its size, its importance as a destination for a variety of purposes, and the special character of its central area. Policy ER8 consequently sets out a full range of development which the Council supports as being what the town needs, is capable of attracting and is likely to benefit from in a way which builds on its character and attractiveness. It would not be feasible for a Core Strategy policy to cover this issue comprehensively, and the policy refers to the production of a supporting Supplementary Planning Document. (The SPD has now been adopted – Doc. 3.3.)
- 5.5.4 In policy ER9 the approach is less comprehensive and this represents a flexibility consistent with the architectural character of the three smaller towns (or key service centres) being less celebrated than that of Whitehaven, their smaller size and their more loosely defined centres. Again, this policy should be read in the context of ST2 and Figure 3.2, which gives a more comprehensive picture of how these settlements should evolve.
- 5.5.5 For Local Centres and other places where there are shops and services, ER9B is intended to be permissive.
- 5.5.6 So the Borough Council submits that the level of direction provided is sufficient at each level in the hierarchy to which it relates, for the following reasons.
- 5.5.7 Firstly, ST2, as the starting point for the spatial strategy, identifies the hierarchy and explains how each settlement fits into that, with a general picture in Figure 3.2 of the nature of development appropriate to each.
- 5.5.8 Secondly, policies ER8 and ER9 take that further as regards retail/town centre uses that should be acceptable in each type of settlement, within the overall aim that Whitehaven and the Key Service Centres should be the main focus for development but that the vitality of smaller places should also be supported.
- 5.5.9 Thirdly, it can be seen that for Whitehaven there is a need to be prescriptive given the special qualities of the place, whilst in the smaller settlements it is appropriate for policy to be more open and permissive, rather than directive, within the framework of the spatial development strategy.

*(Note: we accepted the objections made by representors that ER9(A(i)) appeared to be inconsistent with national policy, and that ER9B appeared to be more restrictive than it*

*should be. Neither of these inferences were intended to be drawn, and we consider that the proposed minor modifications - Doc. 1.4, changes 19 and 20 - set that straight.)*

- 5.5.10 The theme of tourism dealt with in **policy ER10** is related, because the policy of encouraging most development in the towns still applies, but different, because it has to be accepted that the nature of tourism means that it is sometimes appropriate for development to go to 'unsustainable' locations simply because the attraction is where it is.
- 5.5.11 So, whilst the policy refers back to the settlement hierarchy (ER10B), the remainder of it sets out factors covering the Borough as a whole:
- reference to development complementary to the Lake District range of attractions and facilities (ER10A);
  - identification of specific areas where tourism development will be encouraged (and the Council is supporting in these locations uses such as caravan/chalet sites and the proposed 'extreme sports' centre, which would struggle to find a home in the National Park (C);
  - support for quality developments (D);
  - supporting developments which fit into and develop a network of resources (E);
  - co-operation with other key agencies (F).
- 5.5.12 The policy therefore refers to the Borough's existing position as a tourism provider and sets out a range of requirements which are clearly based on what it is suitable and feasible to encourage and promote. The level of direction in the policy is less than might be seen in an area of heavy pressure for development in the sector, but we feel that this approach is suitable for Copeland's circumstances.
- 5.5.13 Finally it can be noted that this approach is consistent with the Cumbria Tourism Strategy (Doc. 6.10), and that Cumbria Tourism supports the policy. (Representation S126, Doc 1.3 page 84). We would refer to the following Tourism Strategy objectives:
- improved infrastructure for the visitor economy (section O2) – ER10E refers;
  - activity to be based on the principles of sustainable development (O2) – ER10B refers;
  - more visitors ... especially along the coastal area (O3) ER10C puts forward suitable coastal locations;
  - develop the tourism industry in ways which do not detract from Cumbria's landscape (O4) – not a specific theme of ER10 but the promotion of tourism in areas fringing the National Park is a means of reducing pressure on its landscape.

**5.6. Will the proposed distribution of employment land help to encourage more sustainable lifestyles?**

- 5.6.1 The distribution of employment land is carried forward from pre-existing plans; what is proposed is that it be continued with, being fit for its purpose.

***The current distribution***

- 5.6.2 The most concise mapping of the supply is in the Employment Land Review (Doc. 6.4, pp. 15-18). These illustrate that employment land is mostly in or adjacent to settlements, and most of that is serving the main towns. Smaller or outlying sites are often on land left over from previous mining or mine-related activity, such as at Rowrah, Frizington or Moresby Parks. These are all in or close to settlements, albeit not the towns. The example most remote from settlements is the Beckermeth Industrial Estate, which is, however, well located with respect to Sellafield and is already used by businesses serving it.
- 5.6.3 The big exception to this is Westlakes Science and Technology Park. This is located, as are most modern business parks in this country, for access from the strategic road network. However, we are persuaded that in view of the size and nature of the Park, if a retrospective sequential test were operated, it would be difficult to imagine a preferable location being found. Westlakes is within walking distance of the southern parts of Whitehaven and on the district's most viable bus corridor. It would be easy to improve sustainable access by setting up shuttle buses between related locations (such as Albion Square and Sellafield), the main railway station and the 'transport hub', or park and ride facility, proposed at Corkickle.

***Could a more sustainable distribution be proposed?***

- 5.6.4 Copeland being a rural district with limited public transport penetration, the options for a more sustainable distribution would, under any realistic circumstances, be limited.
- 5.6.5 As it is, the Borough Council submits that the distribution we have is sustainable as can be reasonably expected, most sites being in settlements and/or on main public transport routes. Looking at the map, Whitehaven Commercial Park (at Moresby Parks) might be an exception; but the Council's opinion is that this merited retention in view of its being the most appropriately configured site we have for general industrial use, worthy of retention as a resource usable for nuclear new build-related business, and close to the line of the Whitehaven Eastern Bypass (reproduced on the Whitehaven Proposals Map in the 2006 Local Plan, Doc. 3.5).
- 5.6.6 Sellafield should also be considered. The Borough and County Councils are working with the site operators and managers to develop a more sustainable framework for the operation of the site. This involves the project to move backroom staff into sustainable locations, primarily Albion Square but also other potential sites in Whitehaven and Workington, along with enhanced public transport and a park and ride system to bring staff in by bus or train. This programme will have far more benefits in terms of carbon savings than anything likely to be achievable by relocating the existing supply (even if suitable locations could be found).

5.6.7 Our conclusion is that the distribution we have may not be altogether ideal, but is not so unsustainable that it requires radical action, particularly as topography and public transport resources make it unlikely that a better pattern of provision could be devised.