



# Copeland Borough Council

Cleator Moor Innovation Quarter

Leconfield Industrial Estate and Adjacent Land

## **Statement of Community Involvement**

June 2022

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**Report title:** Copeland Borough Council

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 This Statement of Community Involvement has been prepared by Avison Young on behalf of Copeland Borough Council ('the applicant') to assist Copeland Borough Council ('CBC' or 'the Council') in its consideration of the accompanying planning application for a mixed-use development at Leconfield Industrial Estate and adjacent land, Cleator Moor, Cumbria ('the Site').
- 1.2 The masterplan proposals will deliver the Cleator Moor Innovation Quarter (CMIQ), which will host the Innovation and Solutions Hub (ISH) enterprise campus. The CMIQ will utilise a business cluster approach to diversify the West Cumbrian economy away from dependency on the Sellafield site by building upon existing knowledge and engineering capabilities in the nuclear and clean energy sectors.
- 1.3 The proposed description of development is as follows:
- "Provision of up to 44,350 sqm (GEA) floorspace for light industrial, general industrial and storage & distribution (Class E(g), B2, B8 uses), Hotel (Class C1) and Student Accommodation (Sui Generis) with ancillary food/beverage (Class E(b)), education and community facility uses (Class F1(a & e)) with internal accesses, parking, service yards, attenuation basins, electricity substations and associated infrastructure, earthworks and landscaping."*
- 1.4 A full description of the development is included within the accompanying Planning Statement. Further information on the development proposals (including details of scale, appearance, massing and their design evolution) is set out within the accompanying Design and Access Statement.
- 1.5 The applicant recognises the importance of quality pre-application engagement. As such, this Statement of Community Involvement sets out the activities undertaken by Avison Young, the applicant and wider project team in engaging with the local community and stakeholders in advance of submission of this planning application to the Council.

## Purpose of this Statement

- 1.6 The consultation process has been designed to complement and supplement the statutory consultation process that will be undertaken by the Council following the submission of this planning application.
- 1.7 This report seeks to outline engagement activities undertaken and the outcome of these activities on the development proposals, including how the feedback provided has assisted in shaping the proposals. This Statement of Community Involvement will:

- Review the current national and local context guiding community and stakeholder engagement in the planning process;
- Outline the adopted consultation strategy which was deemed most appropriate for the proposals when considering the specific context of the Site and project;
- Summarise outcomes of the community and stakeholder engagement activities undertaken with regard to the proposals; and
- Identify how the proposals respond to the feedback provided by the community and stakeholders.

## **Pre-application Engagement with Officers**

- 1.8 The engagement exercises detailed in this Statement are focussed on those with key stakeholders and the local community.
- 1.9 In addition, several meetings with Officers at Copeland Borough Council have been held over the preceding 12 months which have informed the scope, nature, and evolution of the proposals. These discussions have focussed on specific technical, legislative and policy considerations, including the scope of technical survey work and the submission format the planning application.

## **Statement Structure**

- 1.10 This Statement of Community Involvement is structured as follows:
- Chapter 2 – Planning Policy;
  - Chapter 3 – Approach to Community Consultation;
  - Chapter 4 – Summary of Feedback;
  - Chapter 5 – Applicant's Response; and
  - Chapter 6 – Conclusion.

## **Appendices**

- Appendix I: CMIQ webpage hosted on Copeland Borough Council website.
- Appendix II: Press releases in Whitehaven News

- Appendix III: Leaflet drop for November exhibition
- Appendix IV: March exhibition consultation boards
- Appendix V: November exhibition consultation boards
- Appendix VI: November and March consultation surveys
- Appendix VII: November survey responses summary
- Appendix VIII: March survey responses summary

## 2. Planning Policy

- 2.1 Community participation is a key objective in the Government's reform of the planning system, provided for through the National Planning Policy Framework ('the NPPF') and Localism Act 2011. This section provides an overview of national and local policy and additional guidance relating to community involvement in planning.

### National Planning Policy Framework (2021)

- 2.2 Section 4 of the NPPF sets out the requirements and expectations for pre-application engagement by Local Planning Authorities (LPAs) and applicants. The benefits of proactive engagement are outlined at Paragraph 39 which highlights that:

*"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."*

- 2.3 LPAs are required to encourage applicants to engage with the local community before submitting their applications where it could be deemed to be beneficial (Paragraph 40). Paragraph 132 further states that applications which demonstrate early, proactive and effective engagement should be considered more favourably by LPAs than those that cannot.

### Localism Act (2011)

- 2.4 The Localism Act (2011) introduced a statutory requirement for applicants in England to consult with local communities before submitting planning applications for certain types of development. Section 122 of the Act requires an applicant to:

- Publicise the proposed application locally and give a timetable for the consultation;
- Have regard to advice given by the local planning authority about local good practice in undertaking consultation; and
- Take account of the responses to the consultation when submitting the application.

- 2.5 This section of the Act sends a clear signal as to the Government's requirements regarding community engagement in the planning process.

### Local Planning Policy Guidance

*Revised Copeland Borough Council Statement of Community Involvement (August 2020)*

- 2.6 All local planning authorities must prepare a Statement of Community Involvement as defined by the Planning and Compulsory Purchase Act (2004) and in line with the Town and Country Planning (Local Planning) (England) Regulations (2012). The Council is legally obliged to comply with its Statement of Community Involvement once it is adopted.
- 2.7 The Revised Copeland Statement of Community Involvement is a Local Plan document which sets out the standards the Council will use to achieve meaningful consultation through engaging, informing and involving the community, consultees, stakeholders and other interested parties in a) the preparation, alteration and review of Copeland's Local Plan and b) the consideration of planning applications.
- 2.8 The Revised Statement of Community Involvement identifies the changes in engaging with the community, including those changes in national planning policy, and looks at the influence that the Local Plan has on planning and the roles played by the Borough Council, Cumbria County Council and members of the community in connection with planning matters. Fundamentally, the revised Statement of Community Involvement aims to set down how and when the Council will involve the local community in the planning process along with how this document will continue to be monitored and reviewed over time.
- 2.9 Section 3 of the Revised Statement of Community Involvement sets out how community involvement should take place in the development management process.
- 2.10 Once an application is submitted and validated then the Local Planning Authority is required to undertake a formal period of public consultation, prior to making a decision.
- 2.11 Local Planning Authorities have discretion about how they inform communities and other interested parties about planning applications. This usually comprises a combination of site notices and individual consultation letters, depending on the nature and scale of the development proposed. All planning applications are also published on the Council's website. Article 15 of the Development Management Procedure Order sets out minimum statutory requirements for applications for planning permission. These are summarised in the table below

Type of development	Site notice	Site Notice or Neighbour notification letter	Newspaper or advert	Website
Applications for major development as defined in Article 2 of the Development Management Procedure Order (which are not covered in any other entry).		✓	✓	✓
Applications subject to an Environmental Impact Assessment which are accompanied by an environmental statement.	✓		✓	✓
Applications which do not accord with the development plan in force in the area.	✓		✓	✓
Applications which would affect a right of way to which Part 3 of the Wildlife and Countryside Act 1981 applies	✓		✓	✓
Applications for planning permission not covered in the entries above e.g. non-major development.		✓		✓
Applications for listed building consent where works to the exterior of the building are proposed.	✓		✓	✓
Applications to vary or discharge conditions attached to a listed building consent or involving exterior works to a listed building	✓		✓	✓
Applications for development which would affect the setting of a listed building, or affect the character or appearance of a conservation area.				

2.12 The Local Planning Authority will, when appropriate, consider other methods of local communication to bring applications to the attention of those who are likely to have an interest in the application to provide them with information that would enable them to make relevant representations. These include but are not limited to the following:

- Council newsletters
- Using the Council's social media channels such as Facebook and Twitter
- Using the Council's website
- Using local online newspapers



- Informing local neighbourhood forums and parish/town councils by email
- Informing local community, amenity and environmental groups by email

2.13 The time period for making comments will be set out in the publicity accompanying the planning application. This will be not less than 21 days, or 14 days where a notice is published in a newspaper. To ensure comments are taken into account it is important to make comments before the statutory deadline. Local Planning Authorities may, at their discretion, consider comments that are made after the closing date (but have no obligation to do so).

2.14 Once an LPA has received a planning application it must undertake a period of consultation to give interested parties the opportunity to express their views of the development proposal. Examples of the main types of LPA consultation are set out below:

- Statutory consultees: where there is a requirement set out in law to consult a specific body who are then under a duty to respond and provide advice on the development proposal. Examples of statutory consultees include:
  - Highways Authority
  - Local Lead Flood Authority
  - Parish and Town Councils
- Non-Statutory consultees: In addition to the statutory consultees the local planning authority will need to consider whether there are planning policy reasons to engage other consultees who, whilst not designated in law, are likely to have an interest in a proposed development. Examples of non- statutory consultees include:
  - Emergency services
  - Forestry Commission
  - Copeland Disability Forum/South Copeland Disability Forum

### 3. Approach to Community and Stakeholder Consultation

- 3.1 The Applicant has been committed to engaging with the community and stakeholders in developing the CMIQ proposals, in acknowledgement of the value that thorough and effective engagement can add to planning applications. The project team have worked with key stakeholders and local residents on this basis.
- 3.2 In ensuring effective community and stakeholder engagement, the following aims were set:
- Inform local stakeholders and the surrounding community of the intention to develop the Site;
  - Understand the experience of the community at the Site and in the surrounding area;
  - Allow active engagement with the design process so that the final proposals could be improved; and
  - Generate consultee and stakeholder support for the proposals and achieve conflict resolution prior to submission.
- 3.3 This section outlines how the above aims were achieved through a targeted process of engagement

#### **Community and Stakeholder Engagement Strategy**

- 3.4 The applicant has undertaken extended consultation with the local community and key stakeholders, including:
- Key political representatives (including Ward Councillors and the Borough Mayor);
  - Immediate site neighbours (including residents and businesses); and
  - The wider community.

#### **Consultation Format – Website and in-Person Exhibition**

- 3.5 Due to the evolving guidance surrounding the COVID-19 pandemic, it was determined that the public consultation exercises for the CMIQ proposals should be undertaken via a combination of in-person and online events; as it would not be responsible to hold only an in-person event given the present climate and associated health and safety issues. In this manner the applicant has sought to be as inclusive as possible both in the provision of consultation information and in obtaining feedback from the local community.

- 3.6 A dedicated CMIQ page was launched on the Copeland Borough Council website<sup>1</sup> to facilitate public consultation on the proposals. The webpage was live from 16 November 2021, and it is intended to remain live and be updated regularly as the CMIQ proposals progress. The website page provides an overview of the proposals, access to the consultation boards, other visuals, press releases and links to other websites where further information could be reached and a link to online surveys. Therefore, ensuring that all information presented at the exhibitions was available to all if they couldn't attend or preferred not to attend the exhibitions. A screenshot of the CMIQ webpage is provided at Appendix I.
- 3.7 A drop-in exhibition was considered the most appropriate format as it allows people to attend at a time that suits them, and to allow attendees to discuss the proposals and any specific questions with project team members. Initially a single drop-in exhibition was planned but following feedback during the event it was agreed that a second drop-in exhibition would be held to provide further information and clarity on the works involved in the proposed first development phase and also to provide response to feedback received to the first consultation round.
- 3.8 Two, two-day consultation exhibitions were held. The first exhibition was held at the former Cleator Moor Town Council Offices, Cleator Moor on:
- Wednesday 24 November 2021, 11:00-17:00
  - Thursday 25 November 2021, 14:00-18:30
- 3.9 The second exhibition was held at the Civic Hall, Cleator Moor on:
- Tuesday 15 March 2022, 12:00-20:00
  - Wednesday 16 March 2022, 10:00-17:00
- 3.10 The dates and times of the exhibitions were chosen to maximise attendance allowing for people to attend during and after work hours and outside of weekends and school holiday periods. The venues were chosen as they are in the centre of Cleator Moor so would be easily located but were still in proximity to the application site and residential areas of the town. Both venues are also fully accessible to enable maximised attendance by people of all ages and abilities. Between five and seven members of the project team were on hand at each in-person exhibition to answer questions.

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<sup>1</sup> <https://www.copeland.gov.uk/cmiq>

## Consultation Format – Members Briefing

3.11 A Member's briefing was held on 14 March 2022 via Microsoft Teams. All Cleator Moor Town Council Members and Borough Council Members were given a presentation of the proposals which included the following:

- Background and context to the Leconfield site;
- Overview of the CMIQ proposals;
- Detailed descriptions and explanations of the individual components of the CMIQ proposals; and
- Explanation of the benefits and outcomes of the scheme.

3.12 Following the presentation Members were given the opportunity to ask questions to the project team with subsequent individual briefings offered to those that felt that would be helpful for them.

## Advertising the In-person Exhibitions

3.13 For both exhibitions the details of the proposed dates and times were publicised on the dedicated CMIQ webpage and were accompanied by press releases in the local newspaper the Whitehaven News one week prior to the events on Wednesday 17 November 2021 and Wednesday 9 March 2022. Copies of the news articles are provided at Appendix II.

3.14 In addition, for the first event a leaflet drop to 700 residential properties in the town was undertaken. Copies of the leaflet and distribution area are included at Appendix III.

## Consultation Materials

3.15 The information provided at the first in-person exhibition focussed on introducing extent of the CMIQ proposals and explaining how features of the site had influenced the development parameters. At the second in-person exhibition the information provided narrowed down on what works were specifically proposed to take place in the first phase of the development and also provided the project team's responses to key topics and questions raised in the first consultation round.

3.16 At the first exhibition event, five colour boards (at size A0) were presented, providing the following information (available at Appendix IV):

- Board 1: Welcome and introduction to CMIQ, Industrial Solutions Hub and overview of the site
- Board 2: Site constraints and opportunities

- Board 3: Design development and proposed development parameters
- Board 4: Proposed masterplan
- Board 5: Colour rendered masterplan image

3.17 At the second exhibition event, nine colour boards (at size A0) were presented, providing the following information (available at Appendix V):

- Board 1: Welcome and introduction to Enterprising Town Deal funding, Industrial Solutions Hub and phase 1 proposals plan
- Board 2: Introduction to Hub building
- Board 3: Introduction to Hub building concept and use
- Board 4: Introduction to Hub building illustrative images of external
- Board 5: CMIQ proposed development parameters
- Board 6: Development timeline and key outputs
- Board 7: Masterplan
- Boards 8 and 9: Responses to key questions and topics from the first round including rendered visualisations.

3.18 All boards were made available to view on the CMIQ webpage one week prior to the consultation event and remained viewable until the subsequent consultation event.

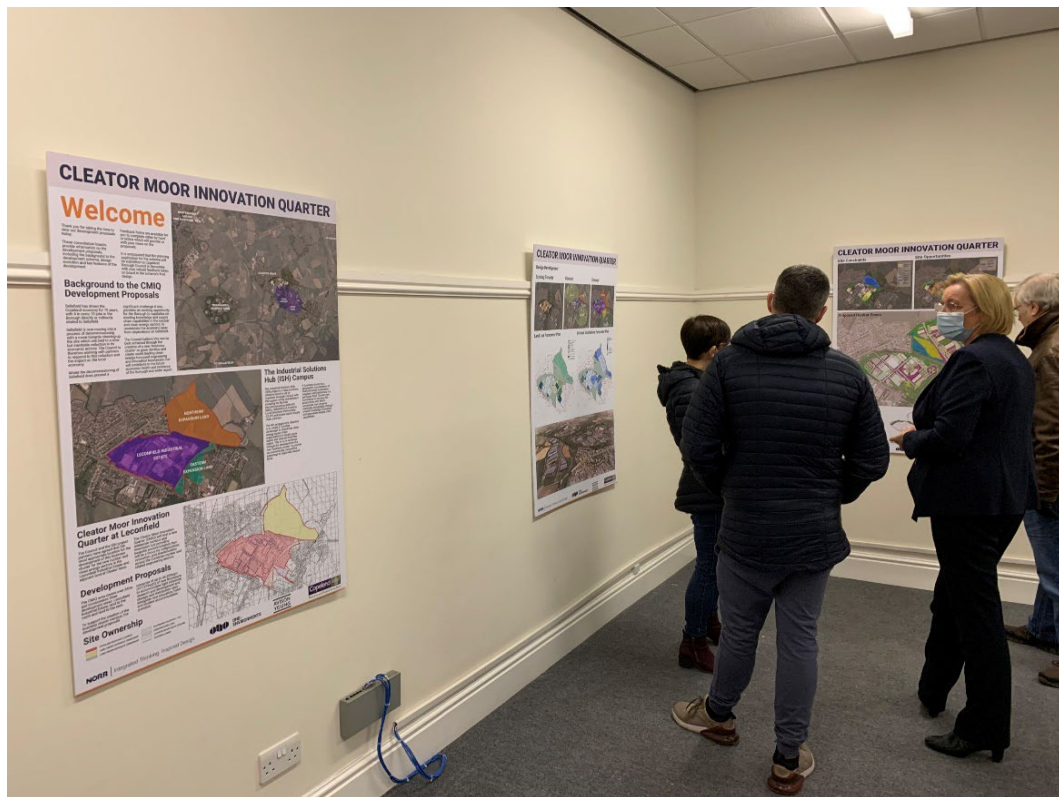


Figure 1: November in-person consultation exhibition



Figure 2: March in-person consultation exhibition

## Consultation Responses

- 3.19 All feedback received was recorded either online via Survey Monkey, or in written-form at the in-person exhibitions held, and key topics of discussions held between project team members at the event. Feedback received was forwarded to the wider project team for consideration in the next design iteration of the proposals.
- 3.20 Copies of the feedback form available online and in hard copies at the in-person events in November and March are provided at Appendix VI. The feedback form for the first consultation round focussed more generally on the CMIQ development proposals whilst the second asked for specific opinions on key features of the proposed first development phases.
- 3.21 The next section of this Report provides an overview of the consultation feedback received via the feedback survey and verbal feedback during the in-person exhibitions.

## 4. Summary of Feedback

- 4.1 Set out below is a summary of feedback received during the consultation exercises. Where possible and feasible, this feedback has been utilised in the preparation of the final planning application documents.
- 4.2 Feedback to the consultations was provided through the following means,:
- Feedback provided at the in-person consultation events; and
  - Feedback provided via the online survey form.

### Attendance and Responses

- 4.3 Approximately 75 people in total attended the two-day exhibition held in November 2021. The online Survey Monkey link remained live for one week after the event. On Friday 3rd December, (when the survey closed) 1,205 responses were recorded. The feedback form contained a mixture of closed and open questions; including areas for respondents to expand upon their answers and provide additional context to their responses.
- 4.4 Approximately 100 people in total attended the two-day exhibition held in March 2022. The online Survey Monkey link remained live until Friday 18th March 2022, a total of 61 survey responses were recorded. The feedback form comprised primarily of closed response answers but also included an open comment box at the end for any specific comments to be made.
- 4.5 In addition, key areas of discussion with members of the project team during the in-person events were recorded.
- 4.6 Key discussion topics, queries and issues raised by attendees and survey respondents have been analysed, categorised, and are summarised below.
- 4.7 In addition, the quantitative results of the surveys are included at Appendix VII (November survey) and Appendix VIII (March survey).

### Key Feedback Topics

- 4.8 Following analysis and coding of the survey responses and verbal feedback received during the exhibition the following key topics have been identified; please note that these are not listed in any specific order:



- *Loss of greenfield/farmland* – A key area of concern expressed via survey respondents and in-person attendees was the resultant loss of greenfield/ farmland, specifically referencing Area 3, to accommodate industrial development. Several respondents cited discrepancy with national planning policy which prioritised reuse of brown field/previously developed land first.
- *Alternative locations for the development* - often made in conjunction with the above point and specifically in reference to the proposals for Area 3, many respondents and attendees questioned why underutilised/vacant industrial space elsewhere in the Borough could not be used as alternative, 'more appropriate' location to accommodate the proposed industrial units. Cleator Moor was considered unsuitable for the scale of the proposals due to proximity of residential properties, congested road network and physical location in a rural area of the Borough.
- *Evidence of Need* – several people questioned the need for the proposals, in particular with reference to the proposed scale of the development.
- *Ecological Impact* – predominantly made with reference to Area 3, the potential negative impact on local wildlife through the loss of habitat, vegetation and disruption during construction and operational phases was a frequently cited concern.
- *Loss of Views* - specifically in reference to the proposals for Area 3, a number of respondents and attendees expressed concerns over the loss of open views towards the Fells currently enjoyed from their homes.
- *Design and scale of proposed units* - often made in conjunction with the above point and specifically in reference to the proposals for Area 3, a number of respondents and attendees expressed concerns over proposed build heights and impact these will have on views from adjacent homes.
- *Impact on residential amenity* - specifically in reference to the proposals for Area 3 and related to the above points was the potential negative impact on adjacent residential properties in terms of loss of views, noise and air quality impact.
- *Traffic and Road Safety* – a key area of concern is the potential impact that the proposals will have on the safe and efficient operation of the surrounding road network resulting from increased overall traffic and frequency of use by HGVs. Bowthorn Road, the existing roundabout access junction at Leconfield Street and Birks Road were identified as key areas of concern and potential accident hotspots.

- *Support for redevelopment of Leconfield Industrial Estate:* - overall support was shown by survey respondents and attendees to the exhibitions towards the redevelopment and improvement of the existing Leconfield Industrial Estate. Many commented on its current poor state of repair, its unattractiveness and antisocial activities on the site (graffiti, fly tipping etc.). Its rejuvenation was generally seen as a positive intervention for the town.
- *Skills/Local Employment Disparity* – Questions were raised regarding how local employment would/could be bolstered by the proposals given the disparity between specialised engineering businesses and Cleator Moor residents skills and education attainment. Several respondents suggested the need for education and training elements to the proposals to counteract this. Similarly, several respondents requested clarity on anticipated job creation to ‘justify’ the loss of greenfield land.
- *Cleator Moor regeneration* – Related to the above, several respondents queried how the proposals would/could assist in the regeneration of the town centre, several suggestions were made that money be directed from the proposals towards physical improvement of the town centre as an alternative proposal.
- *Maintenance of Green Spaces* – Several people raised queried the long-term maintenance programme for the landscaping and areas of open space. Several attendees highlighted the footpath to the rear of the Bowthorn Road allotments as being inaccessible due to poor maintenance. Similarly, questions were raised over the accessibility and maintenance of footpaths in the open space in Area 3 given that it is marshy land, prone to surface flooding.
- *Compulsory Purchase Order* – a number of people questioned the rationale for Copeland Borough Council progressing a Compulsory Purchase Order (CPO) to acquire Area 3.
- *Loss of Allotments* – Several attendees were concerned over potential loss of the informal allotment gardens on Bowthorn Road and Birks Road.
- *Public Art and Local Heritage* – Several people requested that pieces of public art be included across the site and that features of local heritage importance on the site be retained and highlighted to illustrate Cleator Moor’s industrial past.
- *Outdoor furniture* – A number of people requested the inclusion of seating opportunities, outdoor fitness equipment and children’s play within the landscape design.

- *Land Ownership* – Several attendees questioned Copeland Borough Council's ownership of land at Bowthorn Road (proposed for off-carriageway parking), highlighting it's use as a community garden. Several attendees also referenced a covenant restricting its development.
- *Impartiality* – Several people queried the ability of the Council to act as both local planning authority and planning applicant in determining the application.

## 5. Applicant's Response to Feedback

- 5.1 Comments and suggestions regarding the proposals for the Cleator Moor Innovation Quarter have been recorded and considered, enabling key themes and commonalities across feedback provided to be identified. Wherever possible, the comments and suggestions received have fed into the final application submission. It is however important to note that not all concerns can be overcome through the consultation process.

### Themes Identified and Applicant's Responses

#### Need for the development and its location in Cleator Moor

- 5.2 Copeland Borough is heavily dependent on Sellafield and the nuclear sector with 6 in every 10 jobs in the Borough linked to Sellafield. As Sellafield has entered a process of decommissioning the Borough is facing a challenging economic future, with Cleator Moor identified as likely to be particularly significantly affected.
- 5.3 The Industrial Solutions Hub (ISH) Programme is a response to this challenge. It seeks to improve the town of Cleator Moor, the borough of Copeland and the region of West Cumbria through the creation of new employment opportunities for all by re-orienting the economy away from dependence on Sellafield and maximising export potential. It aims to promote West Cumbria as a home to world leading centres of excellence and capability in nuclear and related sectors, whilst at the same delivering significant local community and economic benefits.
- 5.4 The ISH programme's key objective is to incentivise clean energy supply chain organisations to locate, grow, export, and diversify from West Cumbria. This is to be achieved through the development of a high-quality enterprise campus that will host a new business cluster for nuclear and related engineering sectors. Following an extensive search and review of potential locations across the Borough, the appropriate location for this new enterprise campus/nuclear and clean energy cluster has been identified as Leconfield Industrial Estate and adjacent land at Cleator Moor. This process has been led through the preparation of the Council's new Local Plan which proposed to allocate the land for development.
- 5.5 Cleator Moor and Leconfield Industrial Estate were chosen for several factors:
- Leconfield Industrial Estate is in ownership of Copeland Borough Council, thereby removing a number of potential obstacles to the delivery of the campus/business cluster.

- Leconfield Industrial Estate already has permission for a range of light industrial uses to take place on the site and is a suitable size to kick-start the high-quality campus/business cluster vision.
- Cleator Moor is strategically located in proximity to established specialist nuclear centres of Sellafield, Westlakes and Moorside.
- The potential to develop adjacent land which is allocated in the adopted Local Plan for development and is also in the Council's ownership (Area 2) for future Phase 2 expansion. Land to the north of Leconfield Industrial Estate (Area 3) which is allocated for employment uses in the emerging Local Plan also presents an opportunity for future Phase 3 expansion should business demand require it.
- The CMIQ development proposals will significantly improve the built quality of the existing Industrial Estate which is currently in need of investment.
- Leconfield Industrial Estate is located centrally within Cleator Moor close to the town centre with the potential of existing pedestrian and cycle connections to be strengthened and improved. Its proximity to the town centre allows for maximised regeneration and revitalisation benefits resulting from an increased workforce located in the town.
- The proposals also include a strong education and training element, being located within the town allows for maximised encouragement for residents to take up new training and employment opportunities.

5.6 In considering the location of the campus/cluster other industrial sites in the borough were assessed but were not considered appropriate for a range of considerations including their size, existing tenancies, expansion potential to accommodate forecast levels of growth and importantly the ability to tie in improvements for communities. By locating the campus/cluster in Cleator Moor multiple synergies can be made between diversifying and growing the West Cumbrian economy, the physical regeneration of Cleator Moor and the upskilling of its residents.

### **Greenfield development**

5.7 The development is proposed to be delivered on a phased approach with the redevelopment and improvement of the existing Leconfield Industrial Estate to be prioritised, only once this is nearing completion, and if sufficient market demand can be demonstrated will Areas 2 and then 3 be considered for development. This is referred to as the "Leconfield First" principle.

- 5.8 With regards to Area 2, whilst this is currently vacant open grassed land it has been identified in the Copeland Local Plan since 2006 for residential development. As such the principle of its development has been long established as acceptable.
- 5.9 With regards to Area 3, the western portion of this land is currently allocated in the adopted Local Plan for Copeland (Policy EMP1) with the entirety of Area 3 proposed to be allocated for employment uses in the emerging Local Plan (Policy E4PU). The land will only come forward if sufficient market evidence of need can be demonstrated and that a range of technical considerations can be satisfied, including drainage, traffic impact, ecology impact, landscape impact, noise impact etc. Only once these can be shown to be acceptable will the development of the site come forward. Whilst it is acknowledged that the development does represent greenfield development this is not unacceptable in planning terms. A range of considerations are required to be balanced in determining the merits of development proposals including weighing the benefits of the proposals, such as potential economic impact through increased job creation against other considerations such as the loss of farmland.
- 5.10 The indicative proposals for Area 3 include extensive provision of new publicly accessible open space which will also include habitat improvements, maximised retention of hedgerows, increased landscape planting and introduction of green/brown roofs to minimise impact on local wildlife and encourage a greater range and number of species present.

### **Visual impact**

- 5.11 It is acknowledged that the development proposals will change views from various locations, in particular the development of Area 3 which at present comprises of agricultural fields. However careful consideration has been paid to ensuring that the level of this change is acceptable and will not result in significant landscape and visual impacts and that the development can be as visually unobtrusive as feasibly possible.
- 5.12 To inform potential build height parameters across the proposals a Landscape and Visual Impact Assessment (LVIA) and a Residential Visual Amenity Assessment (RVAA) have been undertaken by a chartered Landscape Architect and forms part of the application submission. As part of these assessments a range of computer-modelled images of the proposed development from various viewpoints around the town have been created. The viewpoints were chosen in conjunction with the Planning Officers at Copeland Council.
- 5.13 These modelled views show that whilst there will be a change to some views the impact is not considered severe, with the build heights not interrupting the undulation of the surrounding fells and

from many viewpoints existing and proposed planting of trees and shrubs effectively screen the development from view.

- 5.14 Furthermore, appropriate build materials, façade colours and orientation of the buildings at the subsequent design stage will also have a significant role to play in minimising the visibility of the development. By identifying acceptable building materials palette, colour treatments and through appropriate landscape planting, including green roofs, the visual impact of the development can be softened and filtered. These measures can all be secured and can be secured as part of the planning permission.
- 5.15 It is also highlighted that the planning application is only seeking permission for height parameters which represent a maximum building envelope, to enable flexibility to adapt final building design to the end occupier's requirements. It is likely that future buildings may be smaller (height and footprint) than indicatively shown on the illustrative masterplan.

### **Impact on residential amenity**

- 5.16 Noise and Air Quality surveys have been taken across the site to establish the current baseline and understand the potential impact the proposed uses could have on existing residential properties through potential operations and through increased traffic.
- 5.17 These studies have shown that the proposals will not have a significant effect on the existing baseline in terms of noise or air quality. Notwithstanding this, a range of proposed mitigation measures are identified including the provision of acoustic bunds/fencing, recommended restricted delivery hours etc. to ensure residential amenity is protected. As designs for individual development plots come forward and end operators are known these measures will be considered and implemented where required. A legal requirement to apply mitigation measures can be secured through the planning permission.

### **Impact on local wildlife**

- 5.18 A full suite of surveys and assessments have been undertaken to understand what animals and plants are present on the site and their value. These surveys have greatly informed the development proposals by ensuring that areas of highest value remain free of development.
- 5.19 A range of ecological mitigation measures are proposed to be accommodated within the development including:
- the introduction of green and brown roofs;

- provision of bat and bird boxes;
- extensive planting of native species of trees, shrubs and flowers planting;
- creation of new wetland habitat; and
- where appropriate, enhancement of existing high value habitats.

5.20 The aim of these measures is to increase the range and number of species present on the site. A team of chartered ecologists is part of the CMIQ project team who will work with Council ecologists to ensure appropriate works and species planting are provided on the site to maximise the attractiveness to local wildlife.

5.21 With specific regard to Area 3 the intention is to maximise the retention of areas of high value and features, such as hedgerows and the creation/enhancement of new habitats on the site to minimise ecological impact.

5.22 During construction phases a range of protective measures will be put in place, and secured through the planning permission, to ensure impact on existing wildlife and habitats is minimised.

### **Traffic impact**

5.23 Following agreement with the County Council Highways department, an extensive survey of the local road network has been undertaken to establish the current baseline traffic levels for the area. Following this a computer model is being created based on the number of anticipated journeys from the proposed CMIQ development – cars and HGV's – to understand the impact of this additional traffic on existing junction arrangements. The model also considers other permitted schemes underway in the borough. This model will show if any highways or junction improvements are required because of the proposals.

5.24 Any improvements required will be agreed with the County Council Highways Department and their funding and delivery will be secured by legal agreement to ensure the works are delivered.

### **Jobs created**

5.25 It is anticipated that on completion the CMIQ campus/cluster will accommodate around 700 jobs, the majority of which will be new to the town and the borough. These will be across a range of roles and positions from apprenticeships to highly skilled managerial positions and across full time, part time and shift work.



- 5.26 The ISH programme includes a strong training element to ensure that the Borough's workforce is ready and equipped with the skills and knowledge required to fill future job opportunities. A key feature of the CMIQ campus is the 'Hub building'. This building will be the focal point for the campus providing flexible accommodation including education and training space. It is intended that specialist training will take place here to equip local people of all ages, backgrounds and education attainment with the skills and knowledge to enter the workforce and succeed in future opportunities.
- 5.27 Furthermore, in the short-term, during the construction phases training and apprenticeship opportunities will be provided in building and construction roles which will be offered on a locals-first basis and can be secured as part of the planning permission.

### **Public realm and green spaces**

- 5.28 The proposals seek to significantly improve the quality of the site through a landscape strategy that includes extensive new tree, shrub and flower planting and a network of new and improved footpath and cycle connections connecting with different areas of the town. This will improve the look and feel of area and provide outside areas for people to relax and enjoy.
- 5.29 It is proposed that in these areas seating will be provided and public art and information boards celebrating Cleator Moor's industrial heritage will be accommodated and can be secured as part of the planning permission.
- 5.30 With regards to maintenance of the green areas, a central aim of the proposals is the transformation of the existing Leconfield Industrial Estate into a high-quality landscape-led campus. The CMIQ site will be a welcoming and pleasant place to work in and also provide open areas for people to enjoy the long-term maintenance of the landscaped areas. It is anticipated that the delivery, management and maintenance of the areas of open space and landscape will be secured through the planning permission.

### **Compulsory Purchase Order (CPO)**

- 5.31 To secure the potential expansion of the CMIQ to meet the identified forecast growth and market demand, Copeland Borough Council are investigating the option of a Compulsory Purchase Order route with regards to Area 3.
- 5.32 The CPO process is separate to the planning application process and the grant of planning permission will not trigger the approval of the CPO. The CPO will be considered by an independent Inspector appointed by the Secretary of State.

### **Miscellaneous comments**

- 5.33 The proposals will not impact on the continued use of allotment gardens.
- 5.34 Area 3 comprises of greenfield land, in that it has not been subject to previous development, it is not "Green Belt" land which has a particular legal status.
- 5.35 The development proposals contain no residential elements (i.e., Class C3 dwelling house).
- 5.36 Copeland Borough Council have confirmed ownership of land along Bowthorn Road, any potential for covenants will be considered by the Council's legal team.
- 5.37 Regarding comments surrounding probity of Copeland Borough Council acting as applicant and Local Planning Authority, there are safeguards in place to ensure transparency in the decision making process. Local authorities must advertise and consult on their own applications in the same way as any other application. They cannot be determined by a committee, sub-committee or officer of the authority concerned for the management of any land or buildings to which the application relates. And like any other planning application, local authorities' own applications must be decided in accordance with the development plan unless material considerations indicate otherwise and authorities must take account of relevant planning objections made by residents.

## 6. Summary and Conclusion

6.1 The applicant has undertaken an extended consultation exercise that has included the following:

- Press releases;
- Hosted development webpage on Copeland Council's website; and
- Two 2-day in-person exhibitions where details of the proposals were presented, and members of the project team were on hand to answer questions and queries.

6.2 These are in addition to the extensive pre-application engagement undertaken with Officers at Copeland Council over a number of months that have led to various refinements to the development proposals.

6.3 Ten key themes were identified following analysis of the feedback and commentary provided to the consultation exercises undertaken, these being:

- Need for the development
- Greenfield development
- Visual impact
- Impact on residential amenity
- Impact on local wildlife
- Traffic
- Jobs created
- Public realm and green spaces
- CPO
- Miscellaneous comments

6.4 The applicant has taken the concerns and comments provided into consideration and incorporated them into the final development proposals, where feasible (see accompanying Design and Access Statement for further information).

- 6.5 Most concerns raised related to scale of the proposals and its need, specifically directed towards Area 3. The redevelopment of the existing Leconfield Industrial Estate and development of Area 2 was largely supported and welcomed.
- 6.6 As discussed above Area 3 represents the third phase of the development and will only come forward if there is demonstrable level of market demand and can be shown to be technically deliverable without unacceptable harm.
- 6.7 In summary, the applicant considers that pre-application engagement with the local community and stakeholders has been timely, meaningful and effective; in accordance with local and national planning policy requirements.

## Contact details

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