

St Bees Head Heritage Coast Proposed Extension Consultation

Summary of Responses

March 2019

1 Introduction

This statement sets out how Copeland Borough Council (CBC) undertook a period of consultation in 2019 to seek views on the proposal to extend the St Bees Head Heritage Coast boundary towards Whitehaven. This consultation does not form part of the formal Local Plan preparation process however as the relevant Maritime Local Authority CBC consulted on the proposed extension including any additional land within the defined area (in agreement with Natural England)

In addition to this Statement, a report has been produced detailing responses from each respondent. To protect the identity of individuals each respondent has an ID number.

The consultation event was open for a six- week period held between 7th January and 15th February 2019. To assist consultees a suite of documents was prepared in advance of the consultation event. Documents were available to view on the Council's website, at various libraries throughout the Borough, at the Council's offices at Market Place, Whitehaven and also at the Beacon Museum, Whitehaven. We invited Consultees to complete a questionnaire online or by completing the questionnaire and returning it to the Council by post or emailing to the Strategic Planning Team. The consultation was publicised using the following methods:

- 260 notification letters were posted or emailed to residents, businesses and landowners in Whitehaven located within close proximity to the proposed extension.
- 42 notification letters were posted or emailed to relevant stakeholders, Council members, parish clerks and land owners.
- The consultation was advertised on the Council's website, through social media and the local press.
- The Colourful Coast held a consultation event at the Beacon Hub, Whitehaven on Saturday 9th February 2019. This was an external event, with approximately 30 attendees. Completed questionnaires were emailed over to the Council following the event, responses are summarised within this statement.

2 Summary of number of responses and how they were received

The questionnaire asked for the respondents contact details, capacity in which they were responding and the following four questions:

- Do you support the proposed extension to the St Bees Head Heritage Coast?
- Would you like to see some (or all) of the areas removed from the proposed extension?
- Would you like to see additional land included in the proposed extension to the St Bees Head Heritage Coast?
- Do you have any further comments with regards to the proposed extension of St Bees Head Heritage Coast?

Table 1: Method and Respondent Category

Method of Response				Respondent Type				
Post	Email	Online	Consultation Event	Land Owner	Land Manager	Member of the Public	Business Owner	Other
10	6	43	9	4	2	53	0	9

68 responses were received by the close of the consultation period on 15th February 2019. 66 respondents completed the questionnaire. Respondent (ID1) submitted a report and respondent (ID2) submitted a short email supporting the proposal. Table 1 above summarises, how responses were submitted to the Council and the respondent type. 63% of responses were received via the Council's website through an online questionnaire. 78% of responses were received from members of the public. Zero responses received were identified as being from business owners.

3 Summary of Responses by Question

Question 1: Do you support the proposed extension to the St Bees Head Heritage Coast?

Question 1 required a tick box Yes or No response. 65 consultees supported the proposal. One Landowner (ID 40) made no response although appears to object to the proposal in further comments. Whilst (ID1) supported the proposal subject to assurances that the designation will not preclude appropriate and logical development to support economic growth within the area and that effective management of the area maintains public access. Respondent (ID68) confirmed that 'they could not answer yes due to the way that the question had been worded, although they did support the extension of the site.'

Officers Response to Question 1

Question 1 resulted in a very positive response with 96% of consultees supporting the proposal to extend the St Bees Head Heritage Coast.

As (ID1) response was supportive but subject to assurances it has not been included as a 'Yes' response. However, as Heritage Coasts are protected through the planning system when assessing proposals for development that are in close proximity to a Heritage Coast the role of the Local Planning Authority includes provision that any development in such locations protect and enhance distinctive landscapes and where applicable improve public access to coastal areas. Heritage Coast recognition should therefore not preclude appropriate development and instead ensure that appropriate development is of a higher quality. It is therefore concluded that (ID1) can be assured in this respect. A telephone conversation has been held between an Officer of Copeland BC and (ID68). This conversation clarified that although the proposed extension is supported, there remains outstanding concerns in relation to areas bordering the heritage coast boundary and potential development.

Question 2: Would you like to see some (or all) of the areas removed from the proposed extension?

Question 2 requested that if respondents considered some or all areas should be removed from the proposed Heritage Coast extension their response should set out why it was considered that areas did not meet aspects of the criteria that defines a Heritage Coast. The criteria had 4 points to inform the consultee that were included in the questionnaire. The 4 points are:

- A. Conserve, protect and enhance the natural beauty of the coastline, their terrestrial, coastal and marine flora and fauna and their heritage features
- B. Encourage and help the public to enjoy, understand and appreciate these areas
- C. Maintain and improve the health of inshore waters affecting Heritage Coasts and their beaches through appropriate environmental management measures
- D. Take account of the needs of agriculture, forestry and fishing and the economic social needs of the small communities on these coasts

Table 2: Breakdown of Responses to Question 2

Do not wish to see any areas removed from the proposed extension	No response	Question not directly responded to but comment made
35	32	1

51% of respondents did not wish to see any areas removed from the proposed extension, 47% of respondents did not respond to Question 2. (ID1) confirmed that the proposed extension would not have any adverse implications on the West Cumbria Mining planning application.

Officers Response to Question 2

Although only 51% of respondents confirmed that, they did not wish to see any areas removed from the proposed extension, no responses were received suggesting that areas should be removed. It is therefore concluded that there is a consensus, for the areas proposed to be included are supported.

Question 3: Would you like to see additional land included in the proposed extension to the St Bees Head Heritage Coast?

Question 3 sought views as to whether additional areas of land should be included in the proposed extension. Using the same format as Question 2, it was requested that additional land inclusion should provide additional data explaining how the proposal met criteria A to D that defines a Heritage Coast.

56 (82%) of respondents either did not respond to Question 3 or confirmed that they did not wish to suggest additional areas of land to be considered for inclusion. 12 (18%) respondents made additional suggestions for areas of land that they considered should be included, however

only 1 respondent (ID11) set out how they considered proposal met criteria A to D that defines a Heritage Coast.

Respondents (ID3 and ID4) provided supporting commentary for the proposed extension. Setting out that 'although the identified Gateway area did not warrant specific inclusion in the defined Heritage Coast, it should play a key role in access, interpretation and generally allowing the people of Copeland to enjoy, utilise and understand the Heritage Coast and the health and recreational benefits and opportunities it provides.'

Respondent (ID68) did not wish to see any additional areas included within the boundary but raised concern that area 8, The Kells Farmland and the Old Rhodia Site not being accounted for within the 'gateway site' area and that further discussion should be held between the two parties in this respect.

Officers Response

A number of proposals were included for additional areas of land and the reasons why respondents considered they were appropriate for inclusion in the Heritage Coast Extension. The proposals and Officers response are in Table 3 on the next page. After consideration of the proposals, the overall conclusion remains there are no additional areas that meet the necessary criteria to be included within the heritage coast designation.

Table 3: Additional Areas Proposed for Inclusion

	Area	Reason	Officers Response
1	Ravenhill Track	This area qualifies on criteria A - as it is an important Heritage feature being the access route to Ravenhill Pit and Salmon Pit. Criteria B - recognising Ravenhill track as a heritage feature helps the public understand and appreciate local industrial heritage.	Ravenhill Track is located within Area 9 'Solway Road Fields' of the Landscape Evaluation Studies of the LUC Study evaluation states: 'The area cannot be described as a coastline of exceptionally fine scenic quality, as it has urban fringe characteristics and a small area of derelict land. It is not recommended that area 9 is included in the Heritage Coast, although it is an important part of the Gateway Area. It is considered that the western boundary of area 9 would form a suitable boundary for the Heritage Coast.' (See page 43 of LUC report) It is however considered that the Gateway could help interpretation and therefore its importance may be reflected in any future interpretation for the Heritage Coast.
2	Areas along the coast should be widened.	Due to coastal erosion, this would allow the path to be widened and protected.	Comment noted, this is a matter outside of this consultation process.
3	Area up to Whitehaven Harbour as identified on the map as the 'Gateway site'	No reason given	The area up to Whitehaven Harbour has been assessed as part of this process, and does not meet criteria to be designated as part of the Heritage Coast Extension. It is however recognised as an important area and has therefore been proposed as a gateway site. No change proposed.
4	Additional land e.g. – the Heritage Gateway site on the map	Understand that criteria is not met but feel the area still needs consideration and some form of protection.	See above response
5	Old Marchon Site	Developed into a park/public space	Comment noted, this is a matter outside of this consultation process.

St Bees Head Heritage Coast Proposed Extension Summary of Responses

6	Maybe to Parton	No reason given	Comment noted, this is a matter outside of this consultation process.
7	Include all greenfield areas with the exception of the old Marchon site	No reason given	<p>Four areas of greenfield land have been assessed by LUC.</p> <p>6. Sandwith Farmland – Evaluation ‘The Western part of the Sandwith Farmland can be described as a coastline of exceptionally fine scenic quality, as it has a strong relationship with the sea. The remainder of the farmland, whilst having some scenic qualities, does not have a functional relationship with the coast. It is recommended that the two westernmost fields along the edge of area 6 be included within the Heritage Coast (See LUC Report page 3)</p> <p>8. Kells Farmland –Evaluation – ‘A substantial part of the Kells Farmland can be described as a coastline of exceptionally fine scenic quality, particularly the arable fields on the west side of the Wagon way footpath which are connected to the sea, both visually and through experiential qualities. Fields to the east of the footpath have stronger urban fringe characteristics. It is recommended that the fields west of the Wagon way footpath should be included; it is recommended that the boundary should follow the existing Wagon way footpath along the back of the housing in Kells. This boundary would also allow the whole area of arable fields to be effectively managed for Heritage Coast objectives. (see LUC Report page 41)</p> <p>9. Solway Road Fields – Evaluation – ‘The area cannot be described as a coastline of exceptionally fine scenic quality, as it has urban fringe characteristics and a small area of</p>

St Bees Head Heritage Coast Proposed Extension Summary of Responses

			<p>derelict land. It is not recommended that area 9 is included in the Heritage Coast, although it is an important part of the Gateway Area. It is considered that the western boundary of area 9 would form a suitable boundary for the Heritage Coast.' (See page 43 of LUC report)</p> <p>10. Haig Cliff Top Fields and Haig Pit – Evaluation - Overall the area cannot be described as a coastline of exceptionally fine scenic quality. It is located in proximity to the urban fringe and is partially developed. The majority of the area should not be included in the Heritage Coast, although it is a Key Gateway Point. It is considered that the hard surfaced footpath (a public right of way) which runs parallel to the coastal strip would form a suitable boundary for the Heritage Coast, as the fence line to its west is temporary in nature. This would warrant the inclusion of part of area 10, on the west side of the footpath. (See LUC report page 47)</p> <p>No change proposed.</p>
8	As much of the land surrounding the coastal area	No reason given	See above response
9	Field behind St Marys School and opposite field	As they are part of the old mine tracks and are next to the coastal path to Whitehaven	The field behind St Mary's School falls with area 8. Kells Farmland –Evaluation – 'A substantial part of the Kells Farmland can be described as a coastline of exceptionally fine scenic quality, particularly the arable fields on the west side of the Wagon way footpath which are connected to the sea, both visually and through experiential qualities. Fields to the east of the footpath have stronger urban fringe characteristics. It is recommended that the fields west of

St Bees Head Heritage Coast Proposed Extension Summary of Responses

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10	Land around Haig Pit and down to Whitehaven Harbour	No reason given	<p>The land around Haig Pit falls within area 10 – Haig Cliff Top Fields and Haig Pit - Evaluation - Overall the area cannot be described as a coastline of exceptionally fine scenic quality. It is located in proximity to the urban fringe and is partially developed. The majority of the area should not be included in the Heritage Coast, although it is a Key Gateway Point. It is considered that the hard surfaced footpath (a public right of way) which runs parallel to the coastal strip would form a suitable boundary for the Heritage Coast, as the fence line to its west is temporary in nature. This would warrant the inclusion of part of area 10, on the west side of the footpath. (See LUC report page 47)</p> <p>Area 5 - Whitehaven Harbour – Overall Whitehaven Harbour cannot be described as ‘a coastline of exceptionally fine scenic quality’ as it has been man-modified and natural elements are limited to a narrow strip along the shore. It is not recommended that area 5 be included within the Heritage Coast, although it is a Key Gateway Point to the scenic coast. It is considered</p>

St Bees Head Heritage Coast Proposed Extension Summary of Responses

			<p>That the Headland at Tom Hurd Rock forms a suitable boundary for the Heritage Coast, although the boundary would ideally follow a visible feature on the ground. (See LUC report page 33)</p> <p>No change proposed.</p>
11	Include full coast from St Bees to Whitehaven Harbour	No reason given	<p>The St Bees Heritage Coast has been reviewed, to give consideration for the case to extend it northwards towards Whitehaven. The LUC report provides detailed analysis 11 study areas evaluating each area in terms of appropriateness to be included within the St Bees Head Heritage Designation. (See LUC report)</p> <p>No change proposed.</p>
12	Consider places like Drigg Dunes, and other areas south of St Bees and the coast around Lowca	No reason given	<p>Comment noted, this is a matter outside of this consultation process.</p>

Question 4: Do you have any further comments with regards to the proposed extension of St Bees Head Heritage Coast?

Question 4 was an open question seeking additional comments on the proposed extension.

Table 4: Breakdown of Responses to Question 4

No Comment	Support	Other Comments
23	30	15

44% of respondents provided additional comments of support for the proposal, 34% of respondents made no further comment and 22% of respondents provided additional comments. A summary of comments split into six categories are below:

Support for the proposed extension of St Bees Head Heritage Coast

- Organisations and individuals including (ID 2, 3, 4 and 8) were supportive of the proposal and considered that it could bring benefits to Copeland. One member of the public (ID59) commented that; 'I think it would be very positive for the area. The beauty and ecology of the area is often overlooked and this status would address that.' Another (ID15) suggested that 'without these types of initiatives there will be a dwindling of conservation and monitoring of this precious coastline.'

Comments with regards to the potential residential development on the former Marchon site.

- 8 members of the public raised concern with regards to the potential for a residential development of up to 600 homes, matters raised included the 'Persimmon development proposals are much too near the coast,' and the potential effects to coastal erosion and the wilderness.
- (ID 3 and 4) raised concern that 'residential development may have implications for the future of the arable fields at Old Kells, that the fields are a key component of the extension area and of vital importance in maintaining the integrity, setting and unspoilt nature of the entire Heritage Coast area (Existing and Proposed)

Comments relating to the West Cumbria Mining's planning application.

- (ID1) confirmed that 'the proposed extension would not have any adverse implications on the West Cumbria Mining's planning application.'

Access

- (ID6) welcomed the proposal as long as it takes into consideration people with disabilities where increased access is proposed for the public.

Wildlife

- Two members of the public (ID 21 and 22) raised awareness of the local wildlife habitat that used the area as a feeding and breeding ground.

Other Comments

- A landowner (ID 40) raised concern that Copeland BC had not previously promoted the designation, so wondered why the proposal is now being considered, and that wind turbines should be approved.
- A second landowner (ID48) commented that ‘For any improvements to any parts of the coastline firstly the environment agency must remove the permit that grants united utilities to discharge raw sewerage into beck bottom in Hensingham which then flows into Whitehaven harbour.’