

Appendix 4: Detailed Responses to the Consultation for the St Bees Head Proposed Heritage Coast Extension

ID	Respondent Type	Do you support the proposed extension?	Would you like to see some or all areas removed?	Would you like to see additional areas included?	Further Comments
1	Other (please specify)				<p>CUMBRIA COUNTY COUNCIL'S RESPONSE PROPOSED EXTENSION TO ST BEES HEAD HERITAGE COAST</p> <p>1.0 INTRODUCTION</p> <p>1.1 Heritage Coasts were established to conserve the best stretches of undeveloped coast in England. Heritage Coast were established to:</p> <ul style="list-style-type: none"> • Conserve, protect and enhance the natural beauty of the coastline; their terrestrial, coastal and marine fauna and flora; and their heritage features; • Encourage and help the public to enjoy, understand and appreciate these areas; • Maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures; • Take account of the needs of agriculture forestry and fishing and the economic and social needs of small communities on these coasts. <p>1.2 St Bees Head is the only Heritage Coast in the North West of England. The current St Bees Heritage Coast was defined in 1992 and is 6km in length. The current proposal would extend the St Bees Heritage Coast northwards towards Whitehaven.</p> <p>1.3 Cumbria County Council is a member of the steering group that is overseeing the St Bees Head Heritage Coast extension.</p> <p>2.0 THE RELATIONSHIP BETWEEN THE DEVELOPMENT PLAN AND THE HERITAGE COAST EXTENSION</p> <p>2.1 The draft Copeland Local Plan 2017 – 2035 is at an early stage of its preparation (there was a consultation on Issues and Options in October – November 2017). If following this consultation on the proposed area becomes part of the St Bees Heritage Coast, the next iteration of the draft Copeland Local Plan would need to take account of the area's new heritage coast designation.</p> <p>2.2 The Cumbria Minerals and Waste Local Plan 2015 – 2030 was adopted in September 2017. As such it precedes the proposed extension to the St Bees Heritage Coast. The extension, if confirmed, would be a material consideration in the determination of waste and mineral planning applications. Indeed, the fact that the proposed extension has been recognised as being of sufficient quality to become part Heritage Coast is, in itself, a material consideration although the weight that can be attached to it is less than if it was formally designated.</p> <p>3.0 CUMBRIA COUNTY COUNCIL'S COMMENTS</p> <p>3.1 Cumbria County Council's detailed response focuses on matters related to its role as Strategic Waste and Mineral Authority; Highway and Lead Local Flood Authority and service and infrastructure provider.</p> <p>3.2 The proposed extension is adjacent to a Minerals Safeguarding Area for Brick Clay. However it is considered that this would not cause implications for the proposed extension to the Heritage Coast designation as extraction along this coastline would already be considered environmentally sensitive in terms of visual and ecological impact.</p> <p>3.3 The proposed extension to the St Bees Heritage Coast is close to the redline application site area for the West Cumbria Mining planning application (PA ref: 4179007). The application seek permission for the mining and processing of metallurgical (coking) coal from underneath an onshore area of 302 hectares. The application site already follows some of the coastline located within the existing St Bees Heritage Coast designation. The only feature of the planning application which is within the proposed extension is a drainage pipe which is planned to run down the cliffs.</p> <p>3.4 It is noted that between the WCM planning application site and the proposed extension to the St Bees Heritage Coast there is a proposed new housing estate and significant landscape mounding which creates a separation between both areas.</p> <p>3.5 It is considered that there will be no adverse implications on the proposed extension to the St Bees Heritage Coast on the West Cumbria Mining planning application.</p> <p>3.6 Cumbria Coastal Strategy</p> <p>3.7 Cumbria County Council is working with the Cumbria Coast Protection Authorities and the Environment Agency to develop a strategy for the future management of the coast from Arnside to the Scottish Border. The Cumbria Coastal Strategy forms a key step in setting out future approach to managing risks relating to coastal flooding and erosion along the coastline over the next century. It will feed into the preparation of local planning authorities' development plans.</p> <p>3.8 The Cumbria Coastal</p>

Strategy builds upon the policies set out in the North West Shoreline Management Plan, which was adopted in 2010 and will decide on the best approaches to carry out these policies. More information about the development of the Cumbria Coastal Strategy can be found at: <http://www.cumbria.gov.uk/ccs>.

3.9 The draft strategy documents (Options proforma 11e1 St Bees to Whitehaven, and the Engagement Summary report) make reference to the St Bees Heritage Coast extension proposals.

3.10 The key risk to this section of coastline is erosion. At the northern end of the frontage, spoil material from historical industry in the area has historically been dumped in front of the cliffs, forming new artificial but unconsolidated low cliffs, pushing the shoreline seawards. This activity ceased in the 1930's and the shoreline has experienced retreat since this time.

3.11 The coastline features a number of scheduled monuments and listed structures. The scheduled monument of the Barrowmouth gypsum and alabaster mine at Saltom Bay is located along the steeply sloping cliffs and includes the remains of buildings, levels spoil heaps, enclosure and an incline plane. It is the only example in north west England of this age of mine. Further north, along the base of the cliffs is Saltom coal pit Scheduled Monument, which includes the remains of the first (and oldest surviving) undersea coal mine in northwest England. It is considered one of the most important mining archaeology sites in the country.

3.12 Between St Bees Head and Saltom Pit, the current Shoreline Management Plan (SMP) policy along that frontage is for 'No Active Intervention'. Continued erosion maintains the geological, environmental and landscape value of the coast. The Coastal Strategy recommends that this policy doesn't change.

3.13 At Saltom Pit, the current SMP policy along this frontage is to 'Hold the Line' through maintaining defences and undertaking localised cliff stabilisation until technically difficult or not affordable to do so. It is accepted that should defences fail, they should not be replaced and the policy would change to 'No Active Intervention'.

3.14 The draft strategy documents advise a number of future actions, including in reference to the current footpaths that cross the cliff top - these need to be monitored, with assessments recommended following high precipitation events and storm periods to ensure risk to users is minimised. The England Coast Path, although set back from the coastal edge, may be at risk from cliff slippage and ground movements.

3.15 Between Saltom Pit and Whitehaven, the current SMP policy is to 'No Active Intervention'. The policy maintains a naturally functioning coast, and there would be unlikely to be justification for long term defence.

3.16 For Whitehaven South Beach the current SMP policy is for 'No Active Intervention', which allows existing defences to continue to fail, but recognises the need to monitor the long term risk of breach of the southern harbour arm and the possible need for additional works to this structure. An additional issue here is the nature of the waste into which the cliffs are cut and any potential contamination issues, as well as the rate of erosion of this material.

3.17 Countryside Access 3.17 As highlighted above, there are a number of existing public rights of way within the area of the proposed extension to the St. Bees Heritage Coast. These public rights of way need to be recognised and protected on the legal definitive lines. The County Council's Countryside Access team will continue to work with the Colourful Coast Project and landowners to improve public access in the Heritage Coast area.

4.0 CONCLUSION 4.1 Whilst Cumbria County Council recognise that the proposed extension to the St Bees Heritage Coast will bring recognition of the quality of the coastal area, and in so doing, generate better opportunities for grant funding, its support is 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.

ID	Respondent Type	Do you support the proposed extension?	Would you like to see some or all areas removed?	Would you like to see additional areas included?	Further Comments
2	Land manager	Yes			<p>We welcome the intention to extend the boundary to incorporate further important historic assets, including the Haig Colliery, Saltom Coal Pit and Barrowmouth gypsum and alabaster mine Scheduled Ancient Monuments. The northern boundary will also be adjacent to the Grade II Jonathan Swift House and Whitehaven Town Centre Conservation Area. Whilst these key sites are scheduled, the remains of mining and associated activity are almost continuous along the coast from Barrowmouth to Whitehaven, and these remains are often significant as evidence of past employment and economic systems. We therefore particularly welcome the opportunities that the Heritage Coast designation will bring for conserving and enhancing the historic environment, and improving understanding of its heritage assets. The supporting documentation helpfully describes these, and the opportunities for further analysis as part of a comprehensive management plan.</p>
3	Land owner	Yes	No	<p>The National Trust is very supportive of the proposed boundary extension, which has been assessed against appropriate criteria. We would also draw attention to the identified 'Gateway' area. Whilst we agree that this area does not warrant specific inclusion in the defined Heritage Coast itself, it nonetheless plays 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. We would wish to ensure that the important functions provided by the Gateway area are recognised therefore, and that it forms a material consideration in the assessment of relevant development proposals.</p>	<p>The National Trust is very supportive of the proposal to extend the Heritage Coast. The proposed extension is supported by robust assessment work, which has been informed by discussions with relevant stakeholders. The Trust welcomes the recognition given in the consultation material to the many benefits Heritage Coast definition can generate; environmental; economic and social. The Trust has played a very active role in the management of the St Bees/Whitehaven coastal area for over a decade. We are committed to the conservation and enhancement of the Heritage Coast, to the benefit of local people and visitors, and the rich natural and cultural heritage of the area. The Trust is aware of current proposals by Persimmon Homes which may have implications for the future development of the arable fields at Old Kells. These fields are a key component of the proposed extension area, and of vital importance in maintaining the integrity, setting, and unspoilt nature of the entire Heritage Coast area (existing and proposed). We would therefore strongly object in principle to any development proposals which may subsequently emerge in this area. We are keen to ensure that we are closely involved in any development discussions which may ensue.</p>
4	Land manager	Yes	No	<p>The Colourful Coast Partnership is very supportive of the proposed boundary extension, which has been assessed against appropriate criteria. We are keen to acknowledge the importance of the gateway areas as they have an influence on the setting of the proposed extension area, playing a key role in allowing people to continue to enjoy, access and understand the Heritage Coast for a range of benefits and activities.</p>	<p>The Colourful Coast Partnership have been involved with the Heritage Coast work for some time. This has included facilitating discussion with relevant stakeholders, gathering evidence and submitting the evidence document for consideration. Key members of the Colourful Coast (the Landf Trust and National trust) have played a very active role in the management of the St Bees/Whitehaven coastal area for over a decade. We are committed to the conservation and enhancement of this outstanding, and often overlooked area. We welcome the proposed Heritage Coast extension, as a means of generating wider recognition and enhancement of the Heritage Coast, to the benefit of local people and visitors, and the rich natural and cultural heritage of the area. We are keen to continue to be involved in any future discussions surrounding the Heritage Coast and opportunities the potential extension could bring to the area. The Partnership is aware of the current proposals by Persimmon Homes which may have implications for the future of the arable fields at Old Kells. These fields are a key component of the proposed extension area, and of vital importance in maintaining the integrity, setting and unspoilt nature of the entire Heritage Coast area (existing and proposed) The local community have voiced concern over the loss of these fields to housing development. We would therefore strongly object in principle to any development proposals which may subsequently emerge in this area. We are keen to ensure that we are closely involved in any development discussions which may ensue.</p>

ID	Respondent Type	Do you support the proposed extension?	Would you like to see some or all areas removed?	Would you like to see additional areas included?	Further Comments
5	Member of the public	Yes	No	No the boundary of the proposal already includes all the necessary natural areas around my home.	This feels important to me as I would not like to see the area used for property development and I feel that the National Trust would work to preserve the natural beauty.
6	Other (please specify)	Yes	Include all areas A B C and D	No	C.D.F. welcome this proposal as long as it takes into consideration people with disabilities when increased access is proposed for the public. Any proposals should include equality of access and C.D.F would wish to be consulted as and when final proposals and any plans are brought forward.
7	Other (please specify)	Yes	None	No	Concerns about Saltom Pit historic site.
8	Land owner	Yes	No	Not familiar enough with the surrounding area to be able to comment on this	I think this is an excellent proposal and could bring major benefits to Kells and Whitehaven.
9	Member of the public	Yes		Yes	About 10 years ago part of the land on Wellington Beach collapsed after a storm, a lady was buried in this landslip and died. No action was taken other than closing the beach to the public and the car parks to cars. I would like to see the land protected by putting large boulders on the beach and grading the land down to the beach boulders. This has been done on north shore. This would allow the area back into public use and restore about 20 car parking spaces. Six million pounds was initially spent 20 years ago this should now be capitalised on.
10	Member of the public	Yes	No		
11	Other (please specify)	Yes	No	I suggest that the Ravenhill Track should be included. It qualifies on criteria:- A It is an important Heritage feature being the access route to Ravenhill Pit and Saltom Pit. B Recognising Ravenhill track as a heritage feature helps the public understand and appreciate the local industrial heritage.	Extending the St Bees Head Heritage Coast is an excellent idea especially if it prevents housing development any closer to the sea.
12	Member of the public	Yes	No		The Colourful Coast path is eroding in that area and there is a need to widen it, into the fields. We are very worried about the proposed Persimmon development which is proposing to build within greenfields within the proposed extension areas as well as the former Marchon site. The Persimmon development proposals are much to near the coast.
13	Member of the public	Yes	No	Due to coastal erosion areas along the coast should be widened to allow for the path to be widened and protected.	Concered about Persimmon proposed housing development will endager the coastal path and the coastal erosion it would cause.

ID	Respondent Type	Do you support the proposed extension?	Would you like to see some or all areas removed?	Would you like to see additional areas included?	Further Comments
14	Member of the public	Yes	No	I would support the extension of the heritage coast up to Whitehaven harbour as identified on the map as the 'gateway site' (in blue)	No
15	Member of the public	Yes	No I would not like to see some of the areas removed from the proposal.	I would like to see additional land added but understand it does not meet the criteria as there is industry (contemporary and historic) on this land. But I feel these areas (eg -the Heritage Gateway Site on the map) still need consideration and some form of protection.	I think it is a excellent proposl as without these types of initiatives there will be a dwindling of conservation and monitoring of this precious coastline.
16	Member of the public	Yes	No	I would like to see the old Marchon site be developed into a park/public space and generally pretified.	Completely support the proposal to protect the coast and the views. That is not to say that the old Marchon site should not be developed - (i.e. support the mine and the employment it will bring.)
17	Member of the public	Yes			
18	Member of the public	Yes	No	Maybe to Parton?	I think it is an excellent idea-it is a very beautiful part of Cumbria Coastline Heritage and also would be good to attract more visitors helping the economy.
19	Member of the public	Yes			
20	Member of the public	Yes			
21	Member of the public	Yes	No	No	From my garden at West Row overlooking part of the proposed site I regularly see ravens, peregrine falcons a pair of sparrow hawks a pair of barn owls numerous kestrels and the occasional buzzard, foxes and once seen a deer. This is their home and any proposal that protects and preserves this land has my full support.
22	Member of the public	Yes	No	No	I would like to point out that the fields that run from the Marchon site to Haig Pit are a breeding ground to Grey Partridge, Sky Larks, Lapwing, also a feeding ground for Barn Owls that nest at Haig Pit on the cliffs. The above birds mentioned are all on the endangered list. Due to the stubble left in these fields over winter a rich source of feed for these birds and other over wintering birds.
23	Member of the public	Yes	N/A - No areas removed, if possible expand area to include more greenfield sites.	Expand to include all greenfield areas with the exception of the old Marchon site.	Persimmon Homes are planning to build in areas earmarked for this extension. As a local resident, I strongly object to their plan and support the Heritage Coast extension instead.

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24	Other (please specify)	Yes			We firmly support the recommendations of the bodies that have worked together to put forward this extension and look forward to having the greater recognition of the value of the North West's coast that such an extension will bring.
25	Member of the public	Yes	No	No	This is an excellent idea.
26	Member of the public	Yes	NO	No	I think the LUC report is a beautifully written document that clearly and accurately assessed each area for inclusion. The area would benefit from the extension. We live in Whitehaven and love walking that area and others should too. The existing area has benefitted from adoption and this should too. We are concerned about the recent 600 homes to be built in this area that could spoil the wilderness and it need the protection this offers.
27	Member of the public	Yes	Happy with the proposals	Happy with the proposals	Nothing
28	Member of the public	Yes			No
29	Member of the public	Yes	The more protected land the better	It would be great if as much of the land surrounding the coastal area could be protected by the national trust/ st.bees coastal heritage	The land on the coast is very important to me, the locals living in Whitehaven and the wildlife. It needs to be protected and preserved, now more than ever due to plans to develop 600 houses on and near the coastal area.
30	Member of the public	Yes	No none	No none	No none
31	Member of the public	Yes	Nope I support the proposed extension	I would like to see the field behind st marys school and opposite field also preserved in these plans and they are part of the old mine tracks and are next to the costal path to Whitehaven	I recently went to a public consultation for persimmons homes where they are looking to build on the proposed extension land, I want to see the area preserved as everyone in the local area uses this area for walking and viewing he local history. I would like the see the area renovated for walking like the northern end of the path as it is currently in a rundown state and could use bins for dog mess
32	Member of the public	Yes	N/a	N/a	The beautiful coast line and wildlife need to be protected and preserved. Now more than ever due to plans to build 600 houses very near to this area.
33	Member of the public	Yes			I'd like to see full markings for footpaths
34	Other (please specify)	Yes	No	No	No

ID	Respondent Type	Do you support the proposed extension?	Would you like to see some or all areas removed?	Would you like to see additional areas included?	Further Comments
35	Member of the public	Yes			
36	Member of the public	Yes			
37	Member of the public	Yes			A priority for the proposed extension should include a safe access to the beach area of South shore. Official access via Wellington Pit beach and Saltom beach is no longer available and access via Barrow Mouth is overgrown and difficult. This leaves a long stretch our Cumbrian coastline inaccessible to the general public.
38	Member of the public	Yes			I believe that the walk from St bees to Whitehaven is one of the best in Cumbria but could benefit from some improvements to the paths and fencing, particularly where the coast is eroding. Hopefully the extension will lead to more grant funding to enable more people to enjoy this beautiful coastline.
39	Member of the public	Yes			
40	Land owner				I along with an officer from the planning dept. CBC had St Bees recognised as a Heritage Coast although proposed in 1972 was not officially designated. To my knowledge as a landowner it has only been a negative step. CBC supposedly are the custodians as the local authority of the Heritage coast but they have done absolutely nothing to help promote the designation. When asked the reply has always been Whitehaven Harbour is our priority. So why do they now want to extend the area? We have the highest average wind speed per meter in the UK this is supposed to be the Energy Coast but are not allowed wind turbines. With the outcome of a no for a new reactor at Sella Field we will need more green energy ie wind.
41	Other (please specify)	Yes	No	No	My concern is to protect the natural beauty of the coast so that it continues to be attractive to walkers. e.g. England Coast Path; Coast to Coast, Cumbria Coastal Way. A dramatic, large-scale landscape, feels remote. An important resource for biodiversity and geodiversity. Would encourage development of limited tourism facilities sympathetic to the environment which widen opportunities for visitors to enjoy the HC.
42	Other (please specify)	Yes	No comment	No comment	It is heartening to see this proposal come forward as it brings the Heritage Coast into the heart of Whitehaven. The concept of the gateway site extending inland from the defined area is innovative and one that we as one of the "orphan" Heritage Coast's may well emulate.
43	Member of the public	Yes			
44	Member of the public	Yes			It is a wonderful area that I and many other people both local and visitors enjoy every day. It is a haven for wildlife. To extend it can only be a good thing.

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45	Member of the public	Yes	N/A	N/A	I fully support the proposed extension. The coastal area around Whitehaven has great potential to be a haven for flora, fauna and wildlife - in some places it already is but is not very well known about. The work of the National Trust to protect and share this special place is fantastic and will hopefully go from strength to strength. Re-opening the Haig Museum and having a heritage centre to celebrate the industrial past and people who worked in the mines on the coast should be a priority for the future.
46	Member of the public	Yes			While I am very supportive of the Heritage Coast extension, I would not wish it to be used as a reason to further delay the granting of planning permission to West Cumbria Mining. I believe their proposed plans would minimise any negative impact on the character of the Heritage Coast so far as reasonably practicable, and the benefits of the mine would outweigh any detriment to the character of this small area.
47	Member of the public	Yes	No	I support the gateway concept as otherwise I would have expected the land around Haig Pit and down to Whitehaven harbour to be included despite the man-made impacts.	Mindful that there exists a pipeline from the Rhodia site crossing the proposed extension and that this should be recognised in case of future use associated with redevelopment of the site.
48	Land owner	Yes			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 we cannot subject members of the public and tourists to this .
49	Member of the public	Yes			
50	Member of the public	Yes	No	No	When walking from Whitehaven to St Bees (or give versa) the coastal experience is just as vivid in the proposed extension as it is in the current heritage coast area.
51	Member of the public	Yes	NO	YES INCLUDE THE FULL COAST FROM ST BEES TO WHITEHAVEN HARBOUR	NO
52	Member of the public	Yes			
53	Member of the public	Yes		Should you not have considered places like Drigg Dunes and other coastal areas south of St Bees. Likewise what about coast around Lowca	
54	Member of the public	Yes	no	no	Meets the A,B,C,D criteria Would be of benefit to the proposed development of a coastal activities resources centre in the vicinity of Whitehaven Harbour

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55	Member of the public	Yes	No	No	No
56	Member of the public	Yes	No I think this is a fantastic idea!	No	Excellent idea and sincerely hope this can be executed! 100% support from me!
57	Member of the public	Yes	N/A	N/A	
58	Member of the public	Yes	To keep the upkeeps of the coast		Keep up the good work
59	Member of the public	Yes	No, I think all the proposed areas should be included.	I have no additional suggestions.	As a local resident, 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.
60	Member of the public	Yes			Anything that helps protect the fabulous coastline has to have the support of all parties.
61	Member of the public	Yes			
62	Member of the public	Yes		A	We are very lucky to have a beautiful and peaceful place on our door step.
63	Member of the public	Yes			Very good idea.
64	Member of the public	Yes	No	Yes - all the criteria of A, B, C and D are, in my opinion, met.	No
65	Member of the public	Yes			Can only be better for the area
66	Member of the public	Yes			
67	Member of the public	Yes			

ID	Respondent Type	Do you support the proposed extension?	Would you like to see some or all areas removed?	Would you like to see additional areas included?	Further Comments
68	Other	No	<p>We do not feel any parts of the boundary require amendment to remove part or all of the extension</p>	<p>We do not feel that additional areas are required to be included within the boundary - but as per our letter of 06 June 2018 we are concerned about how the areas referred to as area 8, The Kells Farmland and the Old Rhodia Site not being accounted for within the 'gateway site' area.</p> <p>We attach the letter from 06 June 2018 - which provides detailed comments regarding our concerns about the two site mentioned above.</p> <p>We appreciate that planning permissions may already have been granted for part of the Rhodia site - but would be keen to see that the areas considered would be open space/greenspace and to act as a buffer and maintain scenic quality.</p>	<p>Due to how the question is worded and our concerns raised we do not feel we can answer yes, though NE supports the extension of the site.</p> <p>We also would again like to highlight that we felt that how question 1 was worded and our concerns that we have raised in June 2018 and again now we were unable to answer yes. Natural England does continue to support the extension of the site to further the opportunities for the Colourful Coast Partnership and supporting that delivery of a wider range of benefits. Further connecting Whitehaven to the rich cultural heritage that coast affords in the extension area and beyond. It particularly aligns with ambitions within the governments 25 year environmental plan including connecting people with the environment and enhancing the beauty of landscapes.</p> <p>Natural England would again reiterate that we are keen to work with you to take this forward and would be keen to meet to discuss these issues further. We have attached our letter from June 2018 as the comments and concerns raised according to our records were not responded to and as such keen to discuss these with yourselves.</p>