



Allerdale LDF Core Strategy

SPATIAL OPTIONS;
COCKERMOUTH AND POST-DELUVIAN
ISSUES

DISCUSSION PAPER 3

PREFACE

This is the third, and probably final, Discussion Paper concerning the assessment of the Spatial Options and the choice of the Preferred Spatial Option upon which the Allerdale LDF Core Strategy will be built. Each Paper has built upon the previous one, the lessons learned, and the results of consultation.

Our first Discussion Paper (Sept '09) tried to combine a choice of Spatial Options with a range of Overall Growth Scenarios, this resulted in a total of nine Spatial Options whereas, in reality we were talking about a combination of 5 Growth Scenarios and 4 Spatial Options. It was felt that this was not an appropriate way forward.

We therefore prepared a Second Discussion Paper (Oct '09) which separated the choice of Growth Scenario and the Spatial Options into 2 separate processes. That Paper has proved to be a robust basis for stakeholder and targeted consultation. To save time however, it did require us to choose our preferred Growth Scenario if we were to put figures into our Spatial Options for the distribution of that growth.

The results of consultation and events since the release of Discussion Paper 2, make it necessary to prepare this 3rd Paper and to consider the possibility of creating another Spatial Option for assessment, this is part of a robust and iterative process.

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1. Introduction

Discussion Paper 2 put forward 5 Overall Growth Scenarios for consideration as follows;

1. **Transformational Growth**; for simple comparison purposes this would entail the construction of approximately 562 dwellings per year in Allerdale.
2. **Substantial Growth**; this would need the construction of about 437 dwellings per year.
3. **Max RSS Based Growth**; this for comparison would entail the construction of up to 350 dwellings per year.
4. **Strict RSS Based Growth**; this would require approximately 267 dwellings per year; and,
5. **Decline**; it is difficult to put a figure on this but a completion rate of 150 dwellings per year could result from a declining population.

Only Options 3 and 4 above were considered to be “reasonable” and further assessment of these against our Strategic Objectives led us to choose Option 3 “Max RSS Based Growth” as our Preferred Growth Scenario. Consultation so far has not led us to change this choice, even though consultation has emphasised that even this Scenario requires a considerable increase in development activity to be delivered.

Paper 2 went on to consider 4 Spatial Options for the distribution of this level of growth around the Borough, as follows;

1. **Regeneration Based Urban Option**; this is a wholly urban distribution of development to the 6 main Key Service Centres without any Local Service Centres being designated. The bulk of development would go to the Regeneration Priority Area, being Workington and Maryport. (See Paper 2 for details)
2. **Urban Focus/Rural Concentration**; Not entirely urban focussed but with 79% of development going to the 6 KSCs and 21% to 13 LSCs, being those villages with a school, shop, and public transport.
3. **Urban Bias/Rural Concentration**; This option is still more urban biased than past trend but increases LSCs to 23 to include all villages with schools within them (but not villages which share schools), and allocates 25% of development to them.
4. **Urban Bias/Rural Concentration/Clusters**; Similar to Option 3 in that the urban/rural split remains 75%/25%, but the rural allocation would be more thinly spread to 36 villages, by introducing clusters of villages in southern Allerdale which share schools.

No preference has been stated for any Spatial Option, but consultation so far suggests that a combination of Options 3 and 4 might be an appropriate way forward. However, consultation results and recent flooding events have also created the need to revise our range of Spatial Options. These consultations and events have raised 2 issues which will affect the distribution of development and its phasing.

- **Constraints in Cockermouth**; irrespective of recent floods, consultation with utilities and the highway authority have shown that any expansion of the town to the east and south would be beyond the capacity of the local highway network and that there is little prospect of overcoming this constraint. In addition, United Utilities have revealed for the first time that Cockermouth Waste Water Treatment Works is at capacity and cannot take any more significant development without breaching its river discharge quality requirements.

- **Damage to Workington Infrastructure;** the November floods have had a serious impact upon the accessibility of certain areas of north Workington because of the loss of both road bridge crossings of the River Derwent, and so will affect the deliverability of new housing and commercial development in that area. Therefore we must revisit our Strategy for Workington and assess whether the implications are serious for the deliverability of any of the Spatial Options.

2. Towards a Fifth Spatial Option

In our assessment of the implications of the above issues it is considered that the following questions should be addressed;

1. What are the implications for the deliverability of the preferred Overall Growth Scenario?
2. What are the implications for the spatial distribution of that growth?
3. The above will require an assessment of the scale of development deliverable in Cockermouth.
4. Can Workington retain its role as the focus for a substantial proportion of future development?
5. Are the implications for Workington short or long term? What are the implications for the phasing of development?

2.1 What are the implications for the deliverability of the preferred Overall Growth Scenario?

If Cockermouth cannot deliver its share of future growth, then the preferred scale of overall growth can only be delivered if Cockermouth's share can be delivered elsewhere. Is this realistic?

Cockermouth is a very particular place offering a high quality lifestyle but one of its key assets is the reputation of its state secondary school. The catchment area for the school is quite large and encompasses many of the villages in the Cockermouth Locality and so many people contemplating moving to Cockermouth in order to be in the school catchment are quite prepared to consider moving to these villages. These villages have the added attraction of being, in the main, attractive, set in picturesque countryside on the borders of the Lake District National Park. Yet this attractiveness will also, in some instances, be a constraint upon the scale of development that could be "diverted" in an acceptable way. Yet there are larger villages, for example Broughton and Brigham which could potentially accommodate moderate growth in broadly sustainable locations.

In Workington, the bulk of the town and virtually all the brownfield sites (eg. Corus) with development potential are south of the River Derwent and therefore not affected by the consequences of the flooding.

Therefore, if Cockermouth can accommodate a moderate level of development itself (see 2.3 below), there is no reason why the preferred overall scale of growth cannot be delivered. If Cockermouth cannot deliver even a modest scale of growth and we need to divert an even larger number of dwellings elsewhere, that might not be easily achieved in reality and this could constrain our ability to deliver our preferred level of growth.

2.2 What are the implications for the spatial distribution of that growth?

As noted above, the implications for our Spatial Options depend upon the scale of the "diversion" from Cockermouth and whether that scale of development can realistically be expected to be delivered elsewhere. It is considered realistic to expect some of the

diverted housing to be accommodated in villages closely associated with Cockermouth, as follows; Broughton, Brigham, Papcastle, Dovenby, Bridekirk, Tallentire, Greysouthen, Eaglesfield, Deanscales, Pardshaw and Mockerkin. There is also potential for some smaller scale “ripple effect” to some villages further afield, though some of these are outside the Cockermouth school catchment; Little Clifton, Dean, Branthwaite and Ullock. It should be noted that many of these villages are excluded from development in Option 3 “Urban Bias/Rural Concentration”, but are included in Option 4 “Urban Bias/Rural Concentration/Clusters”. At the same time, the scale of possible diversion into the smaller villages could potentially compromise the delivery of a sustainable spatial strategy.

But how much “extra” development can these villages take? It is difficult to give a definitive answer to this but based on our emerging Strategic Housing Land Availability Assessment (SHLAA) the following estimates are made, these are maxima, for other policy considerations could reduce these figures significantly;

- **Broughton;** on a bare assessment of the SHLAA sites Broughton could deliver up to 364 dwellings though this is likely to be an overestimate.
- **Brigham;** on the same basis Brigham could deliver up to 141 dwellings.
- **Papcastle;** up to 44 units, subject to detail, eg. archaeology.
- **Dovenby;** up to 31 units.
- **Bridekirk;** up to 15.
- **Tallentire;** there may be a small number of infill opportunities.
- **Greysouthen;** up to perhaps 20 dwellings.
- **Eaglesfield;** up to 40;
- **Deanscales;** up to 20;

All the other villages mentioned above could only provide perhaps a handful each such that there is little point in including them in this exercise. The total based on these figures is therefore up to 680 dwellings.

Now we have already assigned a certain scale of development to Cockermouth Locality Local Service Centres;

- Option 3 assigns 4% of development , which equates to 168 dwellings to 2021, and,
- Option 4 assigns 6%, which equates to 240 dwellings.

Therefore on these numbers the Cockermouth LSCs could deliver up to 512 extra dwellings (Option 3) and 440 extra (Option 4). **It must be remembered that these figures are a notional maximum, and that policy considerations are likely to reduce them.**

2.3 The scale of Development deliverable in Cockermouth.

Both Options 3 and 4 assign 15% of development to Cockermouth as a Key Service Centre, which as of 1st April 2009 equates to up to 624 dwellings during the Plan Period to 2021. This number is below historic trend, which for the period 2001-2006 was 22% of housing development.

Currently there are planning approvals for 107 dwellings in Cockermouth, most of which are on the Sullart Street Depot site, where there are serious current viability constraints. If we assume these constraints will ease as the housing market improves and we further assume that there will be a 10% “drop out” rate (in line with trend), we can perhaps expect 96 of these dwellings to be delivered. This leaves a shortfall of 517 for the LDF Plan Period. On the face of it, assuming the figures above for extra village development are not fully deliverable and unless further deliverable sites can be found in Cockermouth, neither Spatial Option 3 nor Option 4 could be fully delivered, although the shortfall will depend on

the proportion of the village figures that actually could come forward, and the shortfall may not be large. However, if say, half of those extra village figures are not forthcoming the shortfall could be as much as nearly 300 dwellings. Therefore, in reality, if we are to deliver Spatial Options 3 or 4 we need to find more deliverable housing sites in Cockermouth. Is this feasible?

In the emerging SHLAA, there is only one modest site in Cockermouth, potentially accommodating 27 dwellings (Brigham Road), and this only if the sewage constraint can be overcome. There is also one large site on the western side of town in the SHLAA assessment process, which is not so severely constrained by highway issues, which could accommodate up to 290 dwellings. However, this site has, so far, not been favoured in the SHLAA site assessment process because of the relationship of the site to the existing built up area. If the waste water constraint could also be overcome on this site (eg. by providing on site treatment facilities) there may be justification for bringing this site forward despite the potential policy reservations.

One very important issue here has so far been ignored, and that is the need for affordable housing and our adopted objective to meet that need. Cockermouth is the hotspot for affordable housing need in the Borough outside the Lake District National Park. The Interim Strategic Housing Market Assessment (SHMA) for Cockermouth puts the current need at 131 local affordable dwellings for the period 2008-2013. Clearly, this scale of need cannot be delivered, even through RSL delivered sites, unless we find more deliverable housing land in Cockermouth. If we have to rely on "quotas" to deliver the bulk of affordable housing, as is the normal case, we could deliver only a small fraction of this need. It can therefore be argued that the issue of affordable housing in Cockermouth is crucial to the choice of Spatial Option that we make.

The need to deliver affordable housing in Cockermouth can only add strength to the necessity of finding more housing land in the town. In this respect it is relevant to note that the owner of the above site for 290 units has offered an affordable quota of 30%, which would, on the basis of these numbers, deliver 87 affordable dwellings which is a substantial proportion of the stated need.

In summary therefore, the answer to question 2.3 will depend upon the policy line taken with potential alternative housing sites. If we are to deliver anything like the affordable housing need in Cockermouth certain policy implications may need to be set aside. It is clear however, that a further Spatial Option, building upon Options 3 and 4, needs to be put forward.

2.4 Can Workington retain its role as the focus for a substantial proportion of development?

The November floods have severely reduced the accessibility of those parts of Workington north of the River Derwent, ie. Northside, Siddick and Seaton. Opportunities for development, other than some commercial, are very limited in Northside and Siddick. However, Seaton, a much larger community has in recent years been a very popular location for housing development and in the past we have normally sought to allocate substantial sites for housing there. However, as long as Seaton's accessibility is severely reduced such a policy would not be appropriate now.

Notwithstanding this there are 2 reasons why this should not prevent Workington retaining its predominant role in delivering development.

1. The accessibility problem should be substantially eased within 6 months when a temporary vehicular bridge is programmed to be open to traffic and further, it should be solved when one or both the lost bridges are replaced, which is

programmed to happen in the next 2 to 3 years. Any Seaton housing sites could then be appropriately brought forward.

2. In 2.1 above we have already stated that the vast bulk of Workington's existing housing land, both greenfield and brownfield, is south of the river where local accessibility has not been affected. There are extant planning approvals on 3 large brownfield sites which can deliver over 800 dwellings over the next few years and furthermore, there is more than sufficient land in the emerging SHLAA to enable Workington to fulfil a predominant role, eg. at the rate of 100 dwellings per year.

Therefore, it is considered that Workington can retain its role as the focus for substantial development.

2.5 Are the implications for Workington Short or Long Term?

We have virtually answered this question already. Assuming the bridges are replaced as programmed, the implications are short term. Furthermore, bearing in mind that it is unlikely that a LDF Site Allocations DPD will be adopted before the bridges are replaced, there are few implications for phasing of development. The one real implication in the short term, ie. the next 2-3 years, is that it is highly unlikely that we shall be able to approve any large housing proposal in Seaton, Northside or Siddick, although small scale infill may be acceptable.

3. The Elements of a Fifth Spatial Option.

The above discussion has shown that ;

- We are unlikely to deliver Spatial Options 3 or 4, or the Overall Growth Scenario if very little housing can be built in Cockermouth;
- That only part of the development assigned to Cockermouth so far, can realistically be expected to be delivered elsewhere, ie. to the Cockermouth Locality LSCs, because capacity in those LSCs is limited and could not pick up all the potential "diverted" development . To expect it to be diverted further afield is likely to be a failure because of Cockermouth's particular attractions.
- That the limited number of LSCs in Option 3 would reduce further the potential for diversion and that the number of LSCs in Option 4 maximises the potential for diversion.
- That therefore, Cockermouth must itself deliver perhaps up to 300 units over and above existing commitments, (see 2.3 above), and Cockermouth LSCs perhaps 217 above their allocated percentage so far.
- That the only realistic way that a substantial proportion of Cockermouth's need for Local Affordable Housing can be met is if Cockermouth delivers a substantial portion of its share of development as originally suggested in Spatial Options 3 and 4.

Our fifth Spatial Option therefore becomes;

Spatial Option 5; Urban Bias/Rural Concentration/Cockermouth Diversion

Key Diagram

Key Elements

1. Very similar to Option 4 but with a 69%/31% Urban Bias but cuts Cockermouth's share drastically because of highway and waste water constraints, and diverts a portion of that share to LSCs in the Cockermouth Locality.
2. Workington (incl. Seaton) and Maryport designated as Principal Service Centres.
3. Four KSCs; Cockermouth, Wigton, Silloth and Aspatria.
4. LSCs as in Option 4 but with Cockermouth development diverted principally to Broughton and Brigham with more modest diversion to; Papcastle, Dovenby, Bridekirk, Greysouthen, Eaglesfield and Deanscales.
5. In North Allerdale Locality implement an exceptional local housing policy, to be criteria based with locational and local occupancy criteria.
6. Residential Development Distribution;

	%	No. Units p.a.
Workington/Maryport	40%	140
Locality LSCs	8%	28
Cockermouth	9%	32
Locality LSCs	12%	40
Wigton	15%	52
Silloth	3%	10
Aspatria	2%	7
Locality LSCs	8%	28
Rural Areas	3%	10

7. Commercial Development Distribution as per Option 4 with more emphasis on Cockermouth LSCs.
8. Outside LSCs commercial/residential conversions acceptable subject to locational criteria.
9. All affordable housing to be in KSCs or LSCs.
10. Supports and enhances roles of Workington, Maryport and Wigton with Cockermouth restricted below trend and role of some Cockermouth LSCs substantially enhanced. Rural areas slightly below past trend.
11. Allows for Derwent Forest but only part of Port Derwent in the plan period.

Reasonableness Assessment

Spatial Option 5; Urban Bias/ Rural Concentration/ Cockermouth Diversion				
	Yes	No	n/a	Comments
Will the option effectively contribute to the fulfilment of the Vision and Strategic Objectives of the Plan?	✓			This option would fulfil virtually all the elements of the Vision and Objectives for both urban and rural communities.
Is it expressed in sufficient detail to enable meaningful community involvement and SA?	✓			The option is sufficiently detailed for the community to take a view, and for SA to be undertaken at a Strategic Level.
Is it a genuine option?	✓			
Will the necessary resources be available from delivery partners to deliver this option?	✓			There is no evidence to suggest that the required resources will not be made available, and at this scale of development in Workington there is more likelihood of necessary infrastructure being provided.
Will there be sufficient time within the plan period to implement the option?	✓			There is no obvious reason to doubt that there is sufficient time, but see next question.
Is there unacceptable risk that the option will not be fully implemented during the plan period?		✓		There is a small risk that some local housing markets will not be able to deliver the scale of urban development required for this option. The scale of development necessary in Workington has been reached only occasionally in the past, and has not been sustained over a prolonged period. There is therefore, a potential low risk that this option could not be delivered but this is not considered unacceptable. There is a low risk that the portion of Cockermouth's share diverted to LSCs may not be delivered.
Does the implementation of the option fall within the legal competence of the Authority?	✓			
Does the implementation of the option fall within the	✓			

geographical competence of the Authority?				
Is the option sufficiently flexible to accommodate changing circumstances?	✓			There is some flexibility here. The scale of growth allows for a range of scenarios and policy would allow some flexibility in locational decisions.
Does the option generally conform with national policy and the RSS?	✓			It is considered that this option broadly conforms with national and regional policy which gives LPAs some discretion in how they deal with rural development.
Is the Option 'reasonable'?	✓			Although there is a low risk to implementation here, this option is considered reasonable.

Commentary; This option scores well in the reasonableness assessment and bearing in mind the constraints that are addressed, the option meets most of our vision and objectives. The Vision and objectives for Cockermouth cannot be wholly met in the town but using the Cockermouth LSCs to redress the problem is a reasonable way forward. Rural allocations continue to support local facilities especially schools.

4. Conclusion and way forward

Option 5 is now added to our Shortlist of "Reasonable Alternative Spatial Options" and will go forward for consultation with stakeholders, and to the further 3 tests;

- Sustainability Appraisal, and
- Habitats Regulation Assessment;
- Final SHLAA test for deliverability

Following completion of these tests the Scale of Overall growth and the Spatial Options will be finally scored and a preferred Spatial Option will be chosen and published for Community Consultation. **It is anticipated that this consultation will take place in February 2010.**

It is emphasised that no final choice has been made for the overall level of growth or the Shortlist of Spatial Options. Stakeholders and consultees can comment on any of the Growth and Spatial Options discussed above. It must also be emphasised that it is possible that a Preferred Spatial Option emerges that is made up from elements of more than one of the above options, and that a new element, not so far considered emerges from the further tests.

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