



Allerdale LDF Core Strategy

FROM STRATEGIC OBJECTIVES

TO

SPATIAL OPTIONS

DISCUSSION PAPER 2

1. Introduction

- 1.1 The first steps in the preparation of Allerdale's Local Development Framework were the preparation of a comprehensive Evidence Base. This must be prepared in order to highlight the priority issues which the LDF must address. This process is complete and after consultation and refinement the following Priority Issues have been identified;

Plan-Wide Priority Issues

- ***Accessibility of West Cumbria, including electronic accessibility;***
- ***Sellafield/Nuclear Issues;***
- ***Low level of investment;***
- ***Climate Change;***
- ***Relatively low skill levels;***
- ***Poor infrastructure, including electronic;***
- ***Housing Renewal/ Housing Mix;***
- ***Demographic Challenge of Ageing Population;***
- ***Rural Sustainability;***
- ***Access to Affordable Housing.***

Workington Locality Priority Issues

- ***Pockets of high Deprivation/Poor Health (incl. obesity);***
- ***Low skill levels;***
- ***Housing Renewal/ Housing Mix;***
- ***Town Centre Shop Vacancies;***
- ***Capacity of Infrastructure;***
- ***Poor Quality of Employment Premises "Offer";***
- ***Relatively poor "Reputation" of schools;***
- ***"Turns its Back" on Coast and River;***
- ***Perceived" Surplus of Employment Land;***
- ***Nuclear Waste.***

Maryport Locality Priority Issues

- ***Pockets of Deprivation/Poor Health;***
- ***Low Skill Levels;***
- ***Relatively Poor "Reputation" of School(s);***
- ***Limited Housing "Mix";***
- ***Poorly performing Retail Sector; loss of shoppers to Workington; Vacant Shops;***
- ***Limited Employment Opportunities;***
- ***Condition of Historic Fabric is variable.***

Cockermouth Locality Priority Issues

- ***Affordable Housing;***
- ***Ageing population/Care Homes;***
- ***Poor Public Transport Connections;***
- ***Poor Rural Services;***
- ***High Levels of Commuting;***
- ***Limited Employment Opportunities;***

- **Limited Infrastructure Capacity;**
- **Flooding;**

Wigton Locality Priority Issues

- **High Levels of Commuting to Carlisle;**
- **Poorly performing Retail Sector; loss of shoppers to Carlisle;**
- **Poor accessibility of Rural Communities to Services/ Rural Remoteness;**
- **Poor state of Town Centre fabric and Public Realm;**
- **Deficit of Open Space/ Sports Facilities;**
- **Traffic in Town Centre;**
- **Flooding;**
- **Rural Affordable Housing;**
- **Limited Housing “Mix”;**
- **Limited Employment Land;**
- **Vulnerable Rural Facilities.**

Silloth Locality Priority Issues

- **Isolated;**
- **Ageing Population;**
- **Poor Public Transport Links;**
- **Low Level of Investment;**
- **Low Skills Levels;**
- **Limited Retail Sector;**
- **Limited Housing “Mix”;**
- **Poor Accessibility of Rural Communities to Services/ Jobs;**
- **Rural Affordable Housing;**
- **Flooding of Low-Lying Areas/ Climate Change;**
- **Vulnerable Rural Facilities.**

Aspatria Locality Priority Issues

- **Overshadowed by other towns;**
- **High levels of Commuting;**
- **Low levels of investment;**
- **Historically, low levels of demand for Housing;**
- **Limited Housing “Mix”;**
- **Limited Employment Opportunities;**
- **Poor Accessibility of Rural Communities to Services/ Jobs;**
- **Limited Retail Sector;**
- **Rural Affordable Housing;**
- **Second Homes in Allonby;**
- **Flooding of Low-Lying Coastal Areas/ Climate Change;**
- **Vulnerable Rural Facilities.**

Finally, it is considered important to separate out those issues which are specifically rural. There is a scattering of rural issues amongst the Locality issues above, but there is an inevitable focus on the main urban area of each locality. Furthermore, the Government wants Local Authorities to “rural proof” planning policies and so therefore, it is appropriate to list those issues which are a priority to rural communities.

Rural Priority Issues

- ***Affordable Housing; for rent and shared ownership;***
- ***Poor accessibility to Services/Education/Jobs;***
- ***Vulnerable Local Facilities;***
- ***Variable Skill Levels;***
- ***Poor public Transport/Dependence upon car;***
- ***Impact of Wind-Turbines;***
- ***Future Sustainability of Communities; especially remote communities;***
- ***Heavy vehicles on inadequate roads;***
- ***Ageing Populations;***
- ***Climate Change/ Agricultural Change/ Flooding.***

Cross-Boundary Issues

No District is an island (unless it is an island of course!), administrative boundaries can be arbitrary, and so there is always interaction and influences between one area and another. Allerdale interacts closely with three other areas and the main issues arising from those relationships are as follows;

Cross-Boundary Issues; Lake District

- ***Roles of Cockermouth and Caldbeck inside and outwith the NP;***
- ***Highway links to the M6;***
- ***Potential to accommodate NP's housing and employment needs outside NP;***
- ***Spreading the benefits of Tourism;***
- ***Implications of World Heritage Site Status.***

Cross-Boundary Issues; Carlisle

- ***Impact of Carlisle "Growth Point" on North Allerdale;***
- ***North Allerdale is within Carlisle SHMA;***
- ***Implications of "Carlisle Renaissance".***

Cross-Boundary Issues; Copeland

- ***"Energy Coast" Masterplan;***
- ***Sellafield; Nuclear New-Build; Nuclear Waste;***
- ***Sub-Region recognised by RSS;***
- ***Shared Sustainable Communities Strategy;***
- ***Shared Evidence Base;***
- ***Joint Infrastructure Needs;***
- ***Align LDF Core Strategies.***

1.2 The identification of those priority issues led directly to the formulation of a Spatial Vision for Allerdale which encompasses the aspirations of other local strategies but, more importantly, addresses the main issues and how they may be overcome or ameliorated. This process is also now complete and our Spatial Vision for Allerdale is as follows;

A SPATIAL VISION FOR ALLERDALE

“Allerdale will, in 2025, be recognizable as the Allerdale of today in that it will have retained and enhanced its positive spatial and environmental characteristics. New development will have met the needs and aspirations of Allerdale’s communities, both urban and rural, and in places will have been transformational in supporting the regeneration and enhancement of our most deprived communities.

Allerdale’s economy will be strong, diversified and well connected, with a highly skilled population, and will be recognized as a leading energy, environment, and related technology, business cluster, building on West Cumbria’s nuclear assets and its technology and research strengths.

All development will have been broadly sustainable, will have accorded with the best environmental practices and contributed to the mitigation of climate change.

A VISION FOR WORKINGTON LOCALITY

Workington, in 2025, will have retained and enhanced its role as West Cumbria’s main residential, educational, leisure, cultural and commercial centre. It will be home to a strong, highly skilled, active and healthy community and offer all its people a good quality of life where deprivation has been significantly reduced.

Major development will have taken place to enhance the locality’s housing, education, employment and visitor “offer”, taking advantage of its coastal and riverside location, and its working port.

Community facilities and the local environment will have been significantly enhanced, particularly in the Lower Derwent Valley.

A VISION FOR MARYPORT LOCALITY

Maryport, by 2025, will have enhanced its role as a key residential, commercial, employment and visitor centre, taking every advantage of its locational, historic and environmental assets. It will be home to a strong, active, healthy and highly skilled population and offer all its people a good quality of life, where deprivation has been significantly reduced.

The role of the town centre will have been enhanced, such that it serves the majority of the shopping needs of its catchment population. The historic fabric of the Conservation Area will be in first class condition.

Major tourism development will have taken place taking particular advantage of Maryport’s Roman and Georgian heritage and its coastal location.

A VISION FOR COCKERMOUTH LOCALITY

Cockermouth, by 2025, will have retained and enhanced its role as a key housing, commercial, employment, leisure, cultural and visitor centre taking every advantage of its locational, historic and environmental assets. It will be home to a strong, active, healthy, and highly skilled population and offer all its people a good quality of life, where deprivation has been reduced.

Infrastructure will be put in place to enable the needs for housing, particularly for affordable housing, for wider employment opportunities, and for the mitigation of the risk of flooding, to be met, whilst also protecting the best of the outstanding local environment.

A VISION FOR NORTH ALLERDALE LOCALITY

WIGTON

Wigton, by 2025, will have an enhanced role as the predominant housing, commercial, employment, educational and visitor service centre in the North Allerdale Locality, taking every advantage of its accessibility, its existing services and its locational, historic and environmental assets. It will be home to a strong, active, healthy and highly skilled population and offer all its people a good quality of life, where deprivation has been reduced.

The role of the town centre will have been enhanced, such that it meets the majority of the shopping requirements of its catchment population. The condition of the fabric of the town centre and the quality of the public realm will have been significantly improved, as will the provision and quality of open space and sports facilities.

SILLOTH

Silloth, by 2025, will have an enhanced role as a local housing, commercial, employment, education and visitor service centre in the North Allerdale locality, taking every advantage of its existing services and its locational, environmental and historic assets as well as its port. It will be home to a strong, active, healthy, and highly skilled population and offer all its people a good quality of life, where deprivation is reduced. Improved educational and employment opportunities have created a more balanced age structure and improvements to transport facilities have improved accessibility to public services. Silloth's tourism role has been consolidated and enhanced whilst, at the same time protecting its outstanding environmental and historic assets.

ASPATRIA

Aspatria, by 2025, will have an enhanced role as a local housing, commercial, education and employment centre in the North Allerdale locality, taking every advantage of its location and accessibility.

It will be home to a strong, active, healthy and highly skilled population and offer all its people a good quality of life, where deprivation has been reduced.

Modest development, both residential and commercial, will have occurred to underpin and enhance Aspatria's wide range of services.

A VISION FOR RURAL AREAS

In all localities, the role of rural settlements as local housing, education, commercial or employment (including agriculture) centres will have been consolidated or enhanced especially in those settlements with schools and other existing facilities. They will be home to strong, active, healthy and highly skilled populations and offer all their people a good quality of life with improved access to public services and employment, and reduced deprivation.

The viability of local facilities will have been underpinned by housing and commercial development of an appropriate scale, and including, in particular, affordable housing. In smaller settlements small scale residential and commercial development has improved local communities' access to housing and jobs, whilst at the same time, the quality of the local environment has been protected and enhanced, and flooding has been prevented or mitigated.

This Vision can only be delivered in partnership with others. Allerdale Borough Council will work with all relevant partners, in both the public and private sectors, to bring about the transformation this Vision requires."

The next step was to translate this spatial vision into Strategic Objectives which form the link between the high level vision and the detailed strategy.

1.3 In preparing our Strategic Objectives we had particular regard to;

- The priority issues;
- Locality strengths;
- The key elements of the Vision;
- “Future Generation”, the West Cumbria SCS; and in particular the “Coastal Renaissance” chapter;
- The Cumbria Community Strategy, the SCS for the County.

The objectives which emerged after consultation are expressed under the 5 Themed headings in the Sustainable Communities Strategy “Future Generation” as follows;

1: A SAFE, STRONG, DIVERSE BUT INCLUSIVE COMMUNITY

- *To plan, manage and enable development to meet the needs of the whole community;*
- *To focus the majority of development into the main towns and villages of Allerdale; in rural areas to focus an appropriate scale of development, including affordable housing, into those settlements with appropriate facilities;*
- *Major development will be mainly confined to the larger urban areas of West Cumbria;*
- *To ensure that design and location of all development reflects the character and local distinctiveness of Allerdale, and promotes inclusiveness, safety (including flood risk), well being, the principles of sustainability and quality of life;*
- *House building will take place to meet the needs of all communities, including the need for affordable housing, both for rent and shared ownership.*

2: A HEALTHY COMMUNITY

- *To ensure that all communities have good access to health, sports and leisure facilities;*
- *To support the enlargement of the footpath, cycleway and bridleway network;*
- *To ensure that the natural and built environment can be enjoyed by all people, now and for generations to come, and thereby contribute to health, quality of life and economic prospects.*
- *To support, wherever possible, proposals which are in line with a healthy communities agenda.*

3: A DYNAMIC AND SUSTAINABLE ECONOMY

- *The nuclear, energy, environmental, educational and tourism sectors of Allerdale’s economy will be supported and encouraged, to support the delivery of the “Energy Coast Masterplan” and West Cumbria SCS;*
- *To support and enable transformational development in the urban areas of Allerdale to support the economy and promote the regeneration of Allerdale’s most deprived communities;*
- *Lillyhall will be developed as a Strategic Employment and Educational Site;*
- *Town centres in the main towns will be supported and enhanced;*
- *Development in the main rural settlements will be of a scale that supports and enhances the rural economy, and sustainability of rural communities;*
- *Major tourism development will be located in sustainable locations in West Cumbria including “Derwent Forest”. Other tourism development, of an appropriate scale will be located in sustainable locations, including settlements along the coast.*

4: A WELL CONNECTED COMMUNITY

- *To support and enhance town centres and to maximise their accessibility;*
- *Most new development will be located in places accessible to a range of travel modes including public transport, whilst accepting the need for rural communities to be largely dependant upon the car;*
- *To enable development in sustainable locations to support rural communities;*
- *To protect and enhance community services and facilities and maximise their accessibility;*
- *To support and enhance access to the Internet, fast Broadband, education and skills training.*
- *To support the enhancement of all modes of transport infrastructure, including air travel, and particularly of public transport.*

5; A WORLD CLASS ENVIRONMENT

- *The environmental, heritage and other cultural assets of Allerdale will be protected and enhanced;*
- *The prevention/mitigation of climate change will be at the heart of all decision making;*
- *The countryside and important landscapes will be protected from unnecessary and/or damaging development;*
- *Greenfield development will be minimised, and the use of natural resources in the most sustainable way will be encouraged, by the support of recycling, the re-use of previously developed land and buildings, the reduction of energy consumption and the promotion of renewable energy;*
- *To prevent pollution and minimise carbon emissions to further mitigate the impact of climate change.*

Our Issues, Spatial Vision and Strategic Objectives are set down in our Issues Paper which is on our website. This document also includes notes on the consultation that was undertaken, and the final Priority Issues, Vision and Strategic Objectives incorporate the results of that consultation.

- 1.4 The Government’s Planning Policy Statement 12 “Local Spatial Planning” states at paragraph 4.3;

“The Strategic Objectives form the link between the high level vision and the detailed strategy. They should expand the vision into the key specific issues for the area which need to be addressed, and how that will be achieved within the timescale of the Core Strategy.”

- 1.5 We must, therefore, now go on to consider our Delivery Strategy which will form the basis for policy in the LDF Core Strategy, and other subsequent DPDs. PPS12 goes on to say at paragraph 4.36;

“Core Strategies must be justifiable; they must be;

- founded on a robust and credible evidence base; and
- the most appropriate strategy when considered against reasonable alternatives.”

Paragraph 4.38 says;

“The ability to demonstrate that the Plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the Local Planning Authority to seek out and evaluate reasonable alternatives promoted by themselves and others, to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan-making process. There is no point in inventing alternatives that are not realistic ...”

1.6 It will be seen therefore, that the alternative spatial strategies should be:

- Reasonable;
- Realistic;
- Potentially generated by others than the LPA;

There is little official guidance as to what a “reasonable alternative” is. The Planning Advisory Service (PAS) has prepared guidance that sets out 4 tests that potential options should undergo. The first and primary test is one of “reasonableness” and involves establishing if the option is realistic and genuinely implementable in practice. This, in effect creates a shortlist of alternatives which are then subject to the final 3 tests;

1. Community Engagement;
2. Sustainability Appraisal;
3. Habitats Regulations Assessment.

The whole of this process to be open and transparent with an audit trail, in order to show stakeholders and consultees that the alternatives assessed were comprehensive. To meet this goal Allerdale has decided to prepare a series of sequential Discussion Papers which will be prepared as alternatives evolve and are scored, until a preferred option is chosen in due course. We have already prepared Discussion Paper 1 which was our first attempt at generating a list of reasonable alternatives, ie. to meet the primary test of “reasonableness”.

2. **Generating the List of Alternative Spatial Options**

2.1 In generating the first, wider list of alternatives, Allerdale acknowledged that there was no point in assessing options which are totally unrealistic, which it is possible to discard without rigorous assessment and without controversy. However, we also acknowledged that if we were to assess options proposed by others, we would, at least initially, have to consider alternatives which might in the end be considered “unreasonable”.

2.2 Accordingly, in Discussion Paper 1, our first list included alternatives which:

- Were generated by other local strategies, e.g. the “Energy Coast” Masterplan and the Sustainable Communities Strategy;
- May not be obviously “unreasonable” or “unrealistic” at first glance; and
- Were included in Allerdale’s original issues and options consultation of 2006.

2.3 The following broad alternative Spatial Options emerged, the intention being that the range of discrete options would cover a broad range of growth scenarios and also a range of locational alternatives for spreading that growth across the District;

1. Transformational Growth (The Energy Coast Golden Scenario);
2. Substantial Regeneration Focussed Growth;
3. Urban Focus/Maximum RSS;
4. Sustainable/Balanced Growth/Max RSS;
5. Existing Population Distribution/Max RSS;
6. Regeneration Focussed/Strict RSS;
7. Sustainable/Balanced Growth/Strict RSS;
8. Historic Trend/Strict RSS;
9. Decline (Energy Coast Worst Case Scenario);

It became clear in discussions around these alternatives, that they needed more detail in terms of scale of development, both residential and employment, and in terms of the implications for alternative settlement hierarchies. Also, the process was trying to combine 2 decisions which ought to be separated, ie. firstly choosing the preferred overall scale of growth and then choosing the reasonable options for the spatial distribution of that growth. This 2 stage process is advocated by the PAS Guidance. Accordingly this second Discussion Paper now goes on to refine the above alternatives into a 2 stage process and to add more detail to the spatial alternatives considered to be reasonable in stage 2.

3 The Overall Level of Growth

3.1 The above 9 spatial alternatives are based on 5 alternative levels of growth, briefly as follows;

- **Transformational Growth**; this is the “Golden Scenario” from the Energy Coast Masterplan and entails population growth in West Cumbria (ie. Allerdale and Copeland combined) from 169,300 in 2003 (Source ONS Mid year est) to 182,900 in 2021 and also entails the completion of 15000 dwellings in West Cumbria, 6000 more than the RSS combined figure for Allerdale/Copeland. Splitting this extra 50/50 with Copeland would require an annual average completion rate of 562 dwellings per year; this figure is based upon a “residual” RSS target of 312 p.a as of 31.3.09. This scenario also entails almost doubling the take up of commercial land in West Cumbria from 2.4 ha to 4.3 ha. p.a. This scenario broadly aligns with Scenario 3 “Aspirational Growth” in the Cumbria Strategic Housing Market Assessment (SHMA).
- **Substantial Growth**; this could be termed a “Silver Scenario” and does not easily fit with the other scenarios considered in the Energy Coast which were based upon assumptions about particular sectors of the local economy. We have assumed that growth would be about half that of the “Golden Scenario”, with half the extra dwellings, ie. 3000, split equally between Allerdale and Copeland. This results in an annual dwelling requirement of 437 p.a., again based upon the residual RSS figure of 312 p.a., and an increase in

commercial land take-up. This broadly aligns with Scenario 2 “Labour Force Led”, of the Cumbria SHMA.

- **Maximum RSS Based Growth**; this could be termed a “Bronze Scenario” and entails a level of growth moderately beyond RSS figures but not so far beyond as to be considered as contrary to RSS. For our purpose we have assumed that a level of growth 10% above the RSS Residual Requirement would be acceptable. This, to all intents and purposes equates to about 350 dwellings per year based on the residual figure of 312 p.a. on 31.3.09, with a small pro-rata increase in commercial land take-up. Again this does not easily align with scenarios in the Energy Coast, but is not significantly different from Scenario 1 “Labour Force No Change” of the Cumbria SHMA.
- **Strict RSS Based Growth**; this entails a strict interpretation of the RSS as a maximum scale of growth, and furthermore, bears down on numbers more by not implementing a residual method of calculation for the rest of the Plan Period. Therefore, our dwelling target would be the original annual figure in RSS, 267 p.a. which correlates with a static population projection. The closest fit with any Energy Coast Scenario is with Scenario 4 which is based upon a declining population of working age and barely rising population. It also aligns reasonably well with Scenario 4 of the SHMA, “Labour Force; Worst Case”. This level of growth is the closest fit with current trend.
- **Decline**; this alternative entails an absolute decline in population and household numbers. It correlates with the “Do Nothing” Scenario of the Energy Coast which entails the loss of 8000 jobs in the nuclear sector in the Plan Period. It is difficult to put an annualised dwelling requirement to this scenario but on the assumption of increasing out-migration and an absolute decline in the number of households in southern Allerdale, and continuation of trend in northern Allerdale, an annual figure of 150 dwellings would be appropriate. There is no equivalent scenario in the SHMA.

3.2 We must now go on to test these alternatives for “reasonableness” and then go on to choose our preferred alternative, before looking at the spatial options for distributing such growth.

“Reasonableness” Test

3.3 The PAS Guidance recommends a list of questions that should be considered when assessing the reasonableness of any alternative option. These may vary according to the type of option being considered, eg. assessment of our growth options will be different from the assessment of spatial options. It is proposed to test our growth options against the following questions;

- Will the option effectively contribute to the fulfilment of the Vision and Strategic Objectives of the Plan?
- Is it expressed in sufficient detail for meaningful community involvement and SA?
- Is it a genuine option? Has it been included to make other options look better?
- Will the necessary resources be available from delivery partners to deliver the option?
- Will there be sufficient time within the plan period to implement the option?

- Is there an unacceptable risk that the option will not be fully implemented during the plan period?
- Is the option sufficiently flexible to accommodate changing circumstances?
- Does the option generally conform to national and RSS policy?

Growth Option 1; "Transformational Growth" (Golden Scenario)				
	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 more than fulfil the Core Strategy Vision and Objectives, especially those aimed at transforming the local economy and housing markets
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?		✓		There is no evidence that this option can be implemented
Will the necessary resources be available from delivery partners to deliver this option?		✓		It is highly unlikely that the required resources to deliver this option will be made available
Will there be sufficient time within the plan period to implement the option?		✓		The scale of this growth option makes it highly unlikely that it could be implemented in the plan period
Is there unacceptable risk that the option will not be fully implemented during the plan period?	✓			The scale of this option and the lack of evidence that the resources and market demand necessary for delivery are available, means that an unacceptable risk exists.
Is the option sufficiently flexible to accommodate changing circumstances?	✓			The scale of growth means that this option would be flexible enough to accommodate changing circumstances, ie. most likely a smaller scale of development
Does the option generally conform with national policy and the RSS?		✓		Whilst the Energy Coast Masterplan has government backing and elements of it may be in line with national policy as it emerges, this option does not conform to RSS
Is the Option 'reasonable'?		✓		The risks involved with this scale of growth are too high for this option to be considered reasonable as the basis for a sound Core Strategy

Growth Option 2; "Substantial Growth" (Silver Scenario)				
	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 the Core Strategy Vision and Objectives, especially those aimed at transforming the local economy and housing markets
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?		✓		There is currently no evidence that this option can be implemented/resourced
Will the necessary resources be available from delivery partners to deliver this option?		✓		It is highly uncertain that the required resources to deliver this option will be made available
Will there be sufficient time within the plan period to implement the option?		✓		The scale of this growth option makes it unlikely that it could be implemented in the plan period
Is there unacceptable risk that the option will not be fully implemented during the plan period?	✓			The scale of this option and lack of evidence that the resources and market demand necessary for delivery are available, means that an unacceptable risk exists
Is the option sufficiently flexible to accommodate changing circumstances?	✓			The scale of growth means that this option would be flexible enough to accommodate changing circumstances, ie. most likely a smaller scale of development
Does the option generally conform with national policy and the RSS?		✓		Whilst the Energy Coast Masterplan has government backing and elements of it may be in line with national policy as it emerges, this option does not conform to RSS

Is the Option 'reasonable'?		✓		The risks involved with this scale of growth are too high for this option to be considered reasonable as the basis for a sound Core Strategy
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Growth Option 3; "Maximum RSS Based Growth" (Bronze Scenario)				
	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 the Core Strategy Vision and Objectives, including those aimed at transforming the local economy and housing markets
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?	✓			The annual level of growth in this option is optimistic but has been delivered during past periods of buoyant local economic conditions
Will the necessary resources be available from delivery partners to deliver this option?	✓			There is no evidence to suggest that the more modest resources and market demand necessary to deliver this option will not be available
Will there be sufficient time within the plan period to implement the option?	✓			Whilst the required annual rate of development has not been sustained over a long period in the past, there is no evidence to suggest it could not be in future
Is there unacceptable risk that the option will not be fully implemented during the plan period?		✓		As above, there is a risk that the required development rate might not be sustained but the risk is acceptable
Is the option sufficiently flexible to accommodate changing circumstances?	✓			The scale of growth means that this option would be flexible enough to accommodate changing circumstances, both an increase and a possible decrease in development against current trend. Significant unforeseen growth would necessitate a review of the Core Strategy
Does the option generally conform with national policy and the RSS?	✓			This option conforms with national planning policy and can also encompass the beginnings of the Energy Coast should such trends manifest themselves. This scale of development is considered to conform with RSS
Is the Option 'reasonable'?	✓			The risks involved with the implementation of this option are not so great as to render it an unreasonable basis for a sound Core Strategy

Growth Option 4; "Strict RSS Based Growth" ("Little Change" Scenario)				
	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 some of the Core Strategy Vision and Objectives, but those aimed at transforming the local economy and housing markets would not be met
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?	✓			This is a perfectly sound option at a level of development in line with past trends
Will the necessary resources be available from delivery partners to deliver this option?	✓			There is no evidence to suggest that the more modest resources and market demand necessary to deliver this option will not be available
Will there be sufficient time within the plan period to implement the option?	✓			The annual scale of required development is slightly higher than the most recent trends, but this is largely due to current economic conditions which should improve
Is there unacceptable risk that		✓		As above, there is a small risk that the required development rate

the option will not be fully implemented during the plan period?				might not be sustained but the risk is acceptable
Is the option sufficiently flexible to accommodate changing circumstances?		✓		The scale of growth means that this option would not be flexible enough to accommodate changing circumstances, the option cannot encompass more than a small increase in development against current trend. Significant, or even modest, unforeseen growth would necessitate a review of the Core Strategy
Does the option generally conform with national policy and the RSS?	✓			This option broadly conforms with national planning policy and this scale of development is considered to broadly conform with RSS although it does not use a residual method of calculating future dwelling requirements.
Is the Option 'reasonable'?	✓			The risks involved with the implementation of this option are not so great as to render it an unreasonable basis for a sound Core Strategy

Growth Option 5; "Decline" ("Worst Case" Scenario)				
	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 not fulfil the Core Strategy Vision and would meet only a few of the Objectives
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?		✓		The loss of jobs at Sellafield which is the basis for this scenario should have begun by now. No such trend is evident.
Will the necessary resources be available from delivery partners to deliver this option?	✓			There is evidence to suggest that resources will be available to prevent the manifestation of this option
Will there be sufficient time within the plan period to implement the option?	✓			Whilst the scale of decline is difficult to predict, decline is easily assimilated
Is there unacceptable risk that the option will not be fully implemented during the plan period?			✓	
Is the option sufficiently flexible to accommodate changing circumstances?		✓		This option is completely inflexible
Does the option generally conform with national policy and the RSS?		✓		This option does not conform to national or RSS policy
Is the Option 'reasonable'?		✓		There is no current evidence to suggest that this option is likely to occur, on the contrary, there is evidence that resources and proposals are likely to occur which would prevent the manifestation of this option

3.4 On this basis we are left with 2 "Reasonable" growth options;

1. **Option 3; Maximum RSS Based, and**
2. **Option 4; Strict RSS Based;**

The other 3 options cannot be considered to be robust and reasonable alternatives upon which a sound Core Strategy can be built. We must now proceed to choose a preferred scale of growth within which to generate a "reasonable" range of spatial options.

3.5 It is proposed that our choice should be based upon a more detailed consideration of the above questions with particular emphasis on;

- The contribution of each option to the fulfilment of the Vision and Strategic Objectives;
- The risk that the option may not be fully implemented; and,
- Flexibility; how far can each option encompass changing circumstances?

There is little to choose between the 2 options when assessed against the rest of the questions.

Vision and Objectives

Option 3; Our Vision and Objectives espouse some of the more “transformational” ambitions of the West Cumbria Sustainable Communities Strategy and the “Energy Coast” Masterplan, the impact of which would be an increase in commercial and residential development to an indeterminate extent. Option 3 allows for a modest increase in development rates within a broad interpretation of the RSS, and therefore can allow for these ambitions to a moderate extent.

Option 4; This option could allow for only a small increase in development rates and would therefore be less well placed to deliver the more transformational ambitions of our vision and objectives. Also, because this option does not use a residual calculation for future targets, it is less in line with the RSS. Obviously, if a residual calculation were incorporated into this option, it would improve deliverability but not to the extent of Option 4.

Assessment; It is considered that **Option 3** could potentially fulfil more of the Vision and Objectives of the Core Strategy.

Risk

Option 3; There is a risk that this option might not be delivered. It entails a considerable increase in development rates for a sustained period over and above recent rates. For a simple comparison, over a six year period this option would seek the completion of almost twice as many dwellings as were completed between 2003 and 2009 (Target of 2100 (6 times 350), compared to 1055 completions). This would be a significant increase which local markets and developers might not be able to deliver. However, the required rate has been reached, even surpassed on occasion in the past, and so this risk is considered to be acceptable.

Option 4; This option is closest to recent past trend, but even so, because of the current economic situation, entails an improvement in development rates over recent trend. However, such rates have been reached and sustained in the past and so there is little risk of this option not being fulfilled. However, the risk with this option lies in the fact that it would not be able to deliver any element of the more ambitious objectives of the SCS and LDF.

Assessment; There is risk associated with both these options, both associated with the more aspirational aspects of the “Energy Coast”, the SCS and the LDF Vision and Objectives. The importance of our Vision and Objectives to the local

economy and quality of life in West Cumbria is such that we must favour **Option 3** again on this basis also.

Flexibility

Option 3; This option is more flexible than Option 4 in that it allows for a wider range of possible future development rates, and can encompass a situation where the Energy Coast aspirations begin to become reality. This is of crucial importance to our Vision.

Option 4; This is a very “narrow” option and does not encompass the scale of development required to deliver our Vision. It would not allow for any significant improvement in the local economy and housing markets, not even if the residual method of calculating housing targets were used.

Assessment; **Option 3** is preferred as a more flexible alternative.

3.6

***Our preferred Overall Level of Growth becomes;
“OPTION 3; MAXIMUM RSS BASED;
BRONZE SCENARIO”***

4 The Generation of “Reasonable Spatial Options”

4.1 We must now proceed to generate a range of spatial options to deliver this overall level of growth. In doing this we have followed the usual process of looking at a range of alternatives, based fundamentally upon varying proportions of development assigned to urban and rural areas and with variations based on themes such as accessibility to services and rural concentration/dispersal. These must be tested for “reasonableness” against the same questions as in paragraph 3.3 above with the addition of;

- Does the implementation of the option fall within the legal competence of the LPA?
- Does the implementation of the option fall within the geographical competence of the LPA?
- Does the Strategic Housing Land Availability Assessment indicate that the option can be delivered?

Only those options considered “reasonable” should go forward to Test 2; Community Consultation, Test 3; Sustainability Appraisal, and Test 4, Habitats Regulation Assessment. The Council will choose its preferred option following the completion of these further tests.

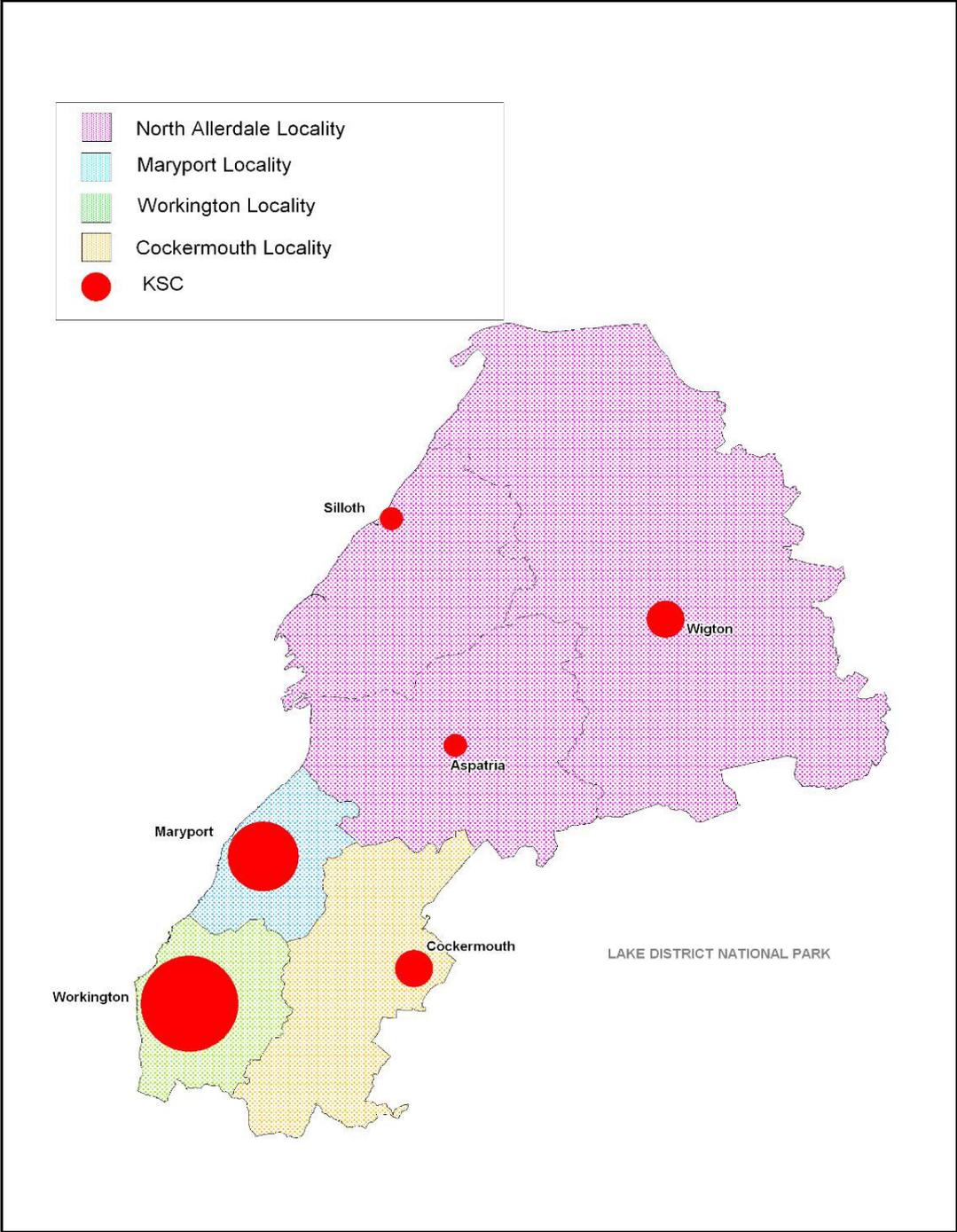
4.2 Therefore, at this stage, it is possible to consider a spatial option which may not, in the end, be considered “reasonable”. We have already stated that the options in our first Discussion Paper did not include sufficient detail to inform a robust scoring system. Accordingly, our options below go into more detail concerning the

spatial distribution of development and the alternative settlement hierarchies that go with them.

Our Range of Spatial Options

Spatial Option 1; Regeneration Based Urban Option

Key Diagram;



Key Elements;

1. The most “urban” oriented option.
2. Workington and Maryport designated as “Principal Service Centres”.
3. Four “Key Service Centres”, Cockermouth, Wigton, Silloth and Aspatria.
4. No Local Service Centres designated; only essential development in the rural areas, plus Derwent Forest.
5. Residential Development Distribution;

	%	No. Units p.a.
Workington/Maryport	60%	210
Cockermouth	15%	50
Wigton	15%	50
Silloth	5%	13
Aspatria	5%	13
Rural Areas	5%	13

6. Commercial development broadly reflects residential with concentration in Workington, Maryport and Lillyhall with some in the other KSCs, particularly Cockermouth and Wigton.
7. Allows for Derwent Forest and Port Derwent.
8. Supports and enhances the roles of Workington, Maryport, and Wigton, with Cockermouth slightly below historic trend.

Reasonableness Assessment

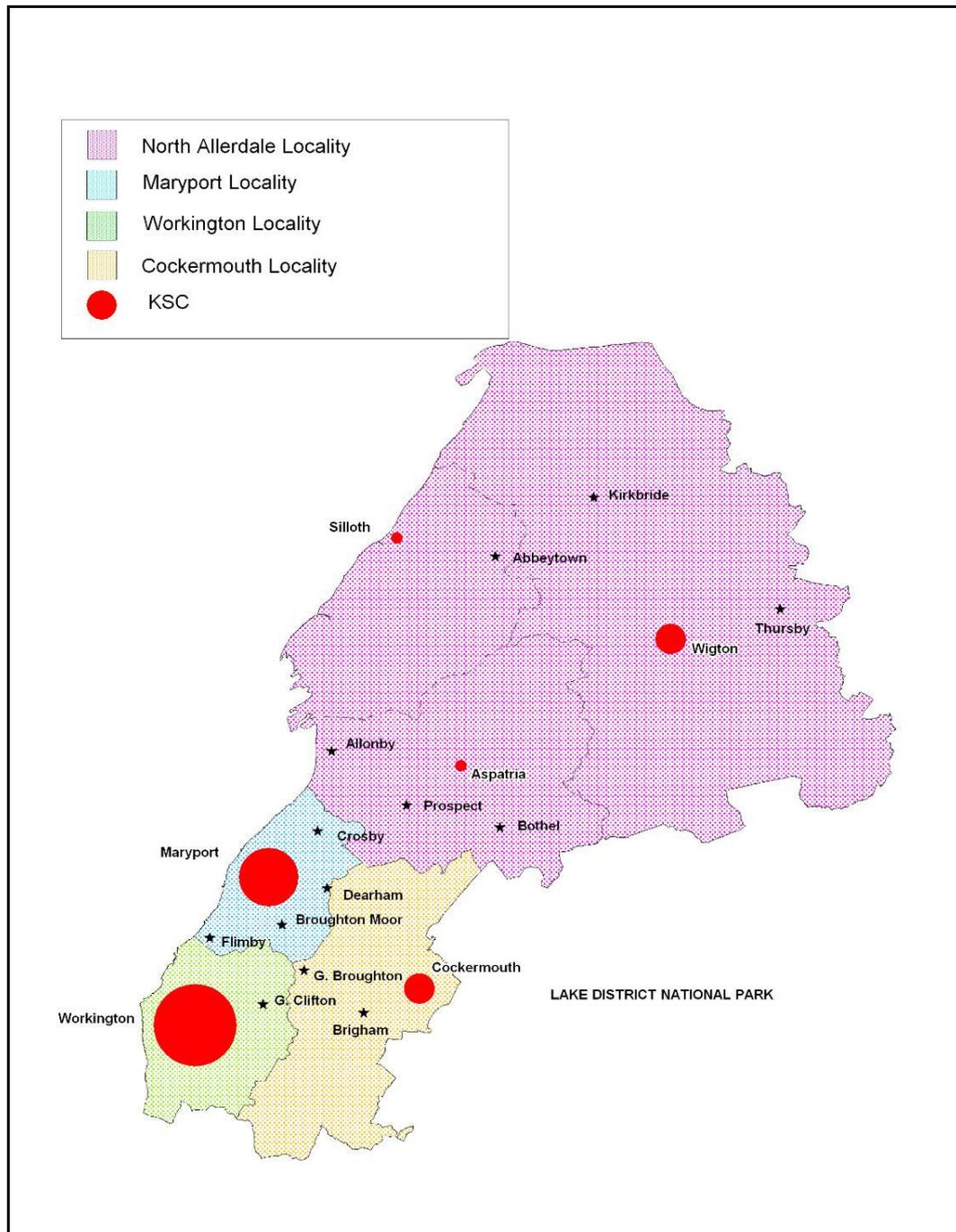
Spatial Option 1; Regeneration Based Urban				
	Yes	No	n/a	Comments
Will the option effectively contribute to the fulfilment of the Vision and Strategic Objectives of the Plan?		✓		This option would fulfil only those aspects of the Core Strategy Vision and Objectives which relate to Allerdale’s urban areas. The vision and objectives for the rural areas would not be met.
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?	✓			This is a genuine, albeit extreme, option for the distribution of the preferred growth 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 although there is some risk in Workington and at Derwent Forest that resources for necessary infrastructure may not be forthcoming.
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 risk that 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 not been reached at all in the past, let alone sustained over a prolonged period. There is therefore, an unacceptable risk that this option could 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?		✓		Flexibility is limited. Although the scale of development proposed means that a wide range of growth can be accommodated, any change of policy for rural areas would necessitate a review.
Does the option generally conform with national policy and the RSS?		✓		This option does not conform to national or RSS policy in that it has no regard to the implications of the Taylor Report into rural communities and does not accord with RSS policy on rural development
Is the Option 'reasonable'?		✓		The risks involved with the implementation of this option and it not being in conformity with national and regional policy make it unreasonable.

Commentary; This option does not score well overall in the tests of reasonableness. The risks involved in implementation and the nonconformity with national and regional policy seem to make this option unlikely to be preferred.

Spatial Option 2; Urban Focus/ Rural Concentration

Key Diagram



Key Elements

1. Not entirely urban focussed, but still biased towards Key Service Centres with a limited number of Local Service Centres, being those with the best range of

- facilities; ie. School, Shop and Public Transport. Elsewhere, only essential development.
2. Workington (including Seaton) and Maryport still designated Principal Service Centres.
 3. Four Key Service Centres; Cockermouth, Wigton, Silloth and Aspatria.
 4. Total of 13 LSCs;
 - In Workington/Maryport Locality; Gt. Clifton, Flimby, Dearham, Crosby, Broughton Moor;
 - In Cockermouth Locality; Broughton and Brigham;
 - In North Allerdale Locality; Allonby, Prospect, Bothel, Abbeytown, Kirkbride and Thursby.
 5. Residential Development Distribution;

	%	No. Units p.a.
Workington/Maryport	50%	175
Locality LSCs	10%	35
Cockermouth	12%	42
Locality LSCs	3%	8
Wigton	12%	42
Silloth	3%	8
Aspatria	2%	5
Locality LSCs	8%	28

6. Commercial development to reflect residential as per Option 1 but with policy promoting commercial development in designated LSCs.
7. Allows for Derwent Forest and Port Derwent.
8. Supports and enhances roles of Workington, Maryport, and Wigton, with Cockermouth below historic trend. Supports villages with best facilities but does not support all schools.
9. Rural Affordable Housing in designated LSCs only.

Reasonableness Assessment

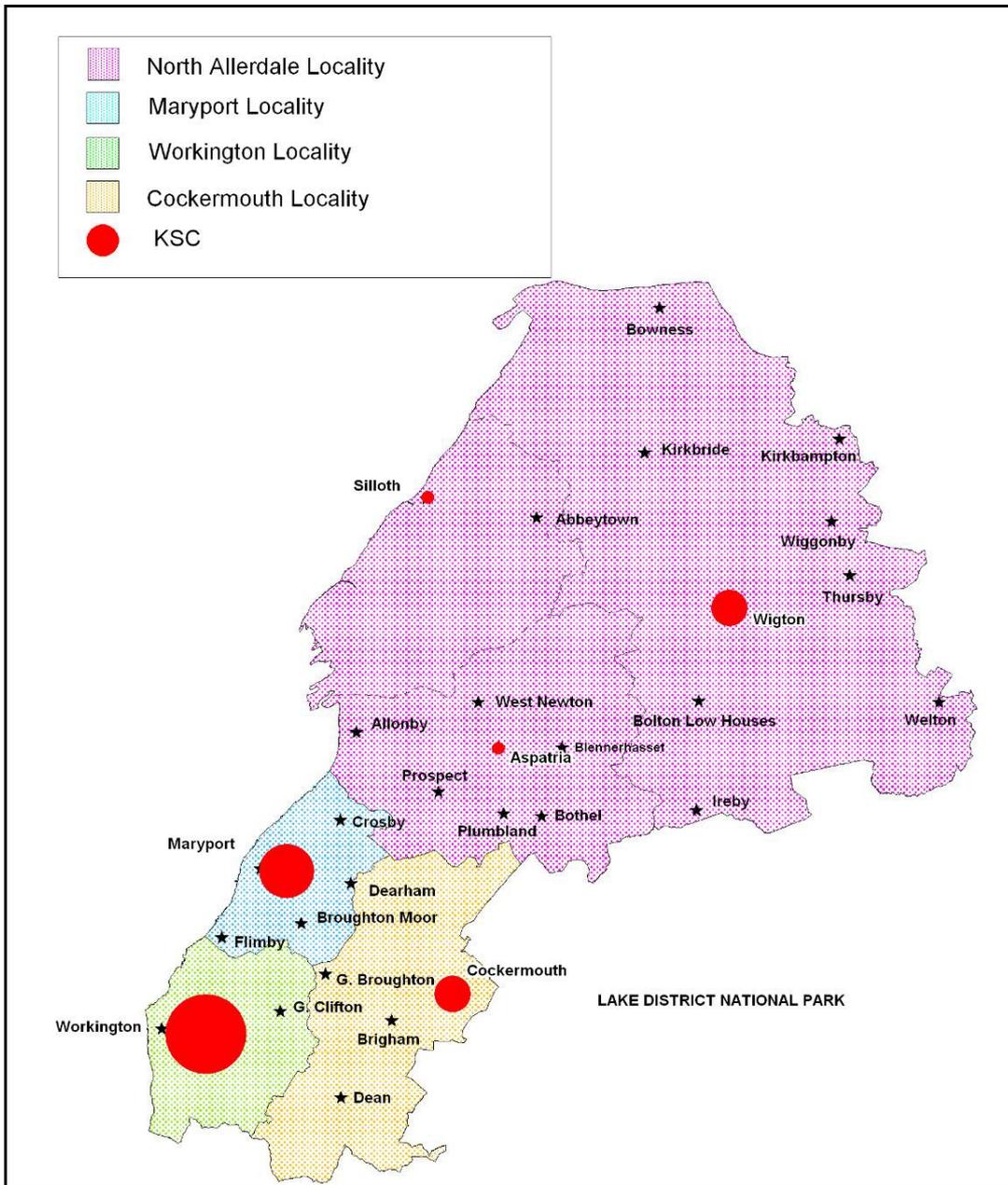
Spatial Option 2; Urban Focus/ Rural Concentration				
	Yes	No	n/a	Comments
Will the option effectively contribute to the fulfilment of the Vision and Strategic Objectives of the Plan?		✓		This option would fulfil those aspects of the Core Strategy Vision and Objectives which relate to Allerdale's urban areas. The vision and objectives for the rural areas would only be partially met.
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 although there is some risk in Workington and at Derwent Forest that resources for necessary infrastructure may not be forthcoming.
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 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 not been reached in the past, let alone sustained over a prolonged period. There is therefore, a potential risk that this option could 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?		✓		Flexibility is limited. Although the scale of development proposed means that a wide range of growth can be accommodated, any change of policy for rural areas may necessitate a review.
Does the option generally conform with national policy and the RSS?		✓		It is considered that this option may not conform to national or RSS policy in that it has limited regard to the implications of the Taylor Report into rural communities and may not accord with RSS policy on rural development
Is the Option 'reasonable'?	✓			Although there are risks to implementation here and this option may be considered to be contrary to RSS policy, there may be justification, in terms of promoting sustainable travel patterns, which make this a reasonable option.

Commentary; The failure of this option to fully address the vision and objectives for the rural areas make it less likely to be preferred. However, should the Authority take the view that it would give priority to promoting sustainable travel patterns in the rural areas it becomes a reasonable option.

Spatial Option 3; Urban Bias/ Rural Concentration

Key Diagram



Key Elements

1. Less of an urban bias here than in Option 2 but still more urban focused than past trend. Also entails a higher allocation to rural areas and a wider distribution to include all villages with schools but not villages which share a school.
2. Workington (incl. Seaton) and Maryport designated as Principle Service Centres.
3. Four KSCs; Cockermouth, Wigton, Silloth and Aspatria.

4. Increases LSCs to a total of 23;
 - Workington/Maryport Locality; Gt. Clifton, Flimby, Dearham, Crosby, Broughton Moor;
 - Cockermouth Locality; Broughton, Brigham and Dean;
 - North Allerdale Locality; Allonby, Prospect, Bothel, Abbeytown, Kirkbride, Thursby, Plumbland, Kirkbampton, Ireby, Blennerhasset, West Newton, Bolton Low Houses, Bowness on Solway, Welton and Wiggonby.
5. Residential Development Distribution;

	%	No. Units p.a.
Workington/Maryport	40%	140
Locality LSCs	8%	28
Cockermouth	15%	52
Locality LSCs	4%	14
Wigton	15%	52
Silloth	3%	10
Aspatria	2%	7
Locality LSCs	8%	28
Rural Areas	5%	18

6. Commercial development to reflect residential, with allocations in larger LSCs and enabling policy in other LSCs elsewhere.
7. Outside designated LSCs implement an exceptional housing policy (to include conversions) based on locational criteria only, eg. well related to an existing settlement, (not necessarily a LSC). Such a policy would make this option the most rural oriented.
8. Rural Affordable Housing all in designated LSCs only.
9. Supports and modestly enhances roles of Workington, Maryport and Wigton, Cockermouth restricted slightly below historic trend. Rural areas close to historic trend.
10. Allows for Derwent Forest but only part of Port Derwent development in the plan period.

Reasonableness Assessment

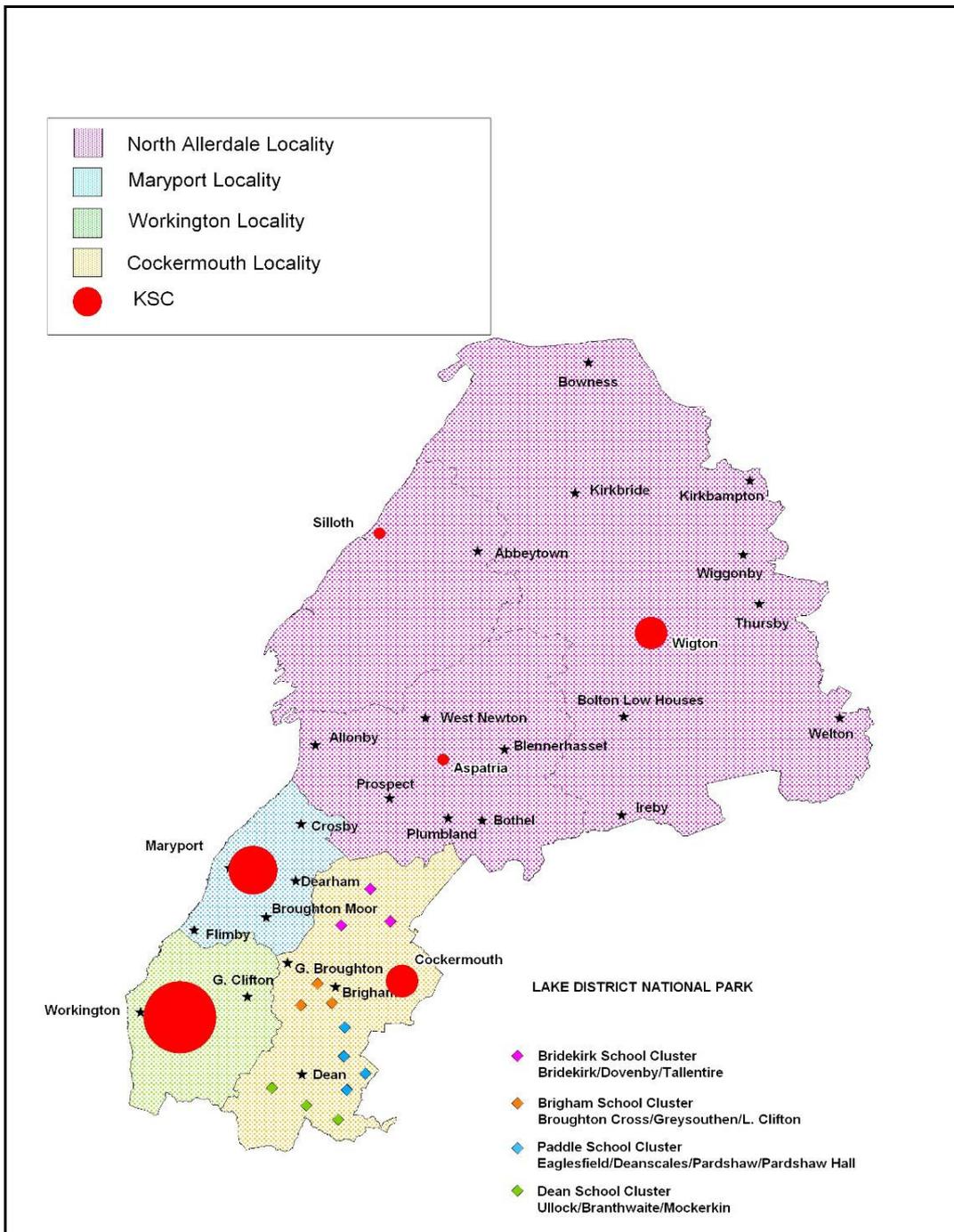
Spatial Option 3; Urban Bias/ Rural Concentration				
	Yes	No	n/a	Comments
Will the option effectively contribute to the fulfilment of the Vision and Strategic Objectives of the Plan?	✓			This option would fulfil those aspects of the Core Strategy Vision and Objectives which relate to Allerdale's urban areas. The vision and objectives for the rural areas would also be largely met though some villages with access to schools would not be LSCs.
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.
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 is attractive in the way it meets most of our strategic objectives. However, it could be marked down by not supporting all the schools in the plan area. The exceptional housing policy could also be considered to be over-generous in not restricting occupancy, leading to a dispersal of open market housing.

Spatial Option 4; Urban Bias/ Rural Concentration/ Clusters

Key Diagram



Key Elements

1. Very similar to Option 3 and still with an urban bias, but widens rural locations to include all schools and certain associated villages by means of a “cluster” concept in South Allerdale and an exceptional local housing policy in North Allerdale 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 3 with the addition of the following clusters of villages in South Allerdale (ie, Workington/Maryport and Cockermouth Localities);
 - Paddle School Cluster; Eaglesfield, Deanscales, Pardshaw, Pardshaw Hall;
 - Dean School Cluster; Ullock, Branthwaite, and Mockerkin (Dean already a LSC);
 - Bridekirk/Dovenby School Cluster; Bridekirk, Dovenby and Tallentire;
 - Brigham School Cluster; Broughton Cross, Greysouthen, Little Clifton (Brigham already a LSC);
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	15%	52
Locality LSCs	6%	20
Wigton	15%	52
Silloth	3%	10
Aspatria	2%	7
Locality LSCs	8%	28
Rural Areas	3%	10

7. Commercial development as per Option 3 but including Cluster LSCs.
8. Outside LSCs, commercial/residential conversions acceptable subject to locational criteria.
9. All rural affordable housing to be in LSCs.
10. Supports and enhances roles of Workington, Maryport and Wigton with Cockermouth restricted below past trend. Rural Areas close to past trend.
11. Allows for Derwent Forest but only part of Port Derwent in the plan period.

Reasonableness Assessment

Spatial Option 4; Urban Bias/ Rural Concentration/ Clusters				
	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.
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 highest in our reasonableness assessment. Our Vision and Objectives are such as to lead inevitably towards an option which allows for a considerable scale of rural development but based upon locational criteria which support local facilities, particularly schools. Based on historic trend this option still has an urban bias but bears down slightly on past trend in Cockermouth and the rural areas. Historic trend here does not take into account the impact of the Interim Housing Policy implemented since 2004.

5. Conclusion and Way Forward

5.1 We now, therefore, have chosen our preferred scale of overall growth and have a shortlist of reasonable spatial options, as follows;

Preferred Scale of Overall Growth;

“Maximum RSS Based Growth”

and;

Shortlist of “Reasonable Alternative Spatial Options”

1. Urban Focus/ Rural Concentration
2. Urban Bias/ Rural Concentration
3. Urban Bias/ Rural Concentration/ Clusters

5.2 These can now go forward to be subject to the further tests

- Sustainability Appraisal; and
- Habitats Regulation Assessment
- Final SHLAA Sites; Deliverability of each option.

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.**

5.3 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.

November 2009