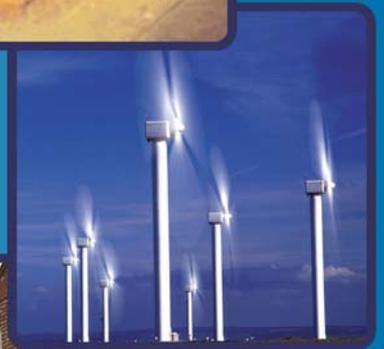
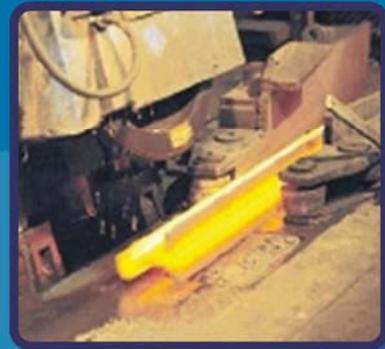


Allerdale

Local Development Framework



Core Strategy

Issues & Options

September 2006



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Introduction

The Council is preparing the Core Strategy for its Local Development Framework. When finalised, the Core Strategy will set out the basic principles and policy direction for planning and development in Allerdale (outside the National Park) up to 2021. Over time it will be complemented by more detailed documents setting out site allocations and development control policies. Collectively these documents will form the basis for decision making on development and use of land across the plan area and will form part of the Statutory Development Plan for Allerdale outside the National Park.



The purpose of this consultation document is to assist in the discussion of the issues and options that the Core Strategy should address. This will in turn help the development of preferred options for the plan area.

Each section poses a series of options/questions which we would welcome comments on. In particular, your views on whether the right issues and options have been identified would be welcome.

All the options have been included in a comments form to help assist with making comments. Copies of the comments form can be obtained by contacting the planning policy team on 01900 702767 or by visiting the Council's website www.allerdale.gov.uk

If you wish to comment on the Core Strategy issues and options document please submit them in writing to:

**Regeneration Strategy Manager
Allerdale Borough Council
Allerdale House
Workington
CA14 3YJ**

Email: ldf@allerdale.gov.uk

Fax: 01900-702848

All comments must be received by no later than 27th October 2006

The Core Strategy Issues and Options document is also available on the Council website www.allerdale.gov.uk

Local Development Framework

In 2004, the Government introduced a new planning system through the Planning and Compulsory Purchase Act. This Act requires all Local Planning Authorities to replace their Local Plans with a new form of development plan known as a Local Development Framework. *In the case of Allerdale, this applies to that part of the District outside the National Park.*

Unlike the Local Plan, which is a single, complete document, the new Local Development Framework will be made up of a series of separate documents. The Core Strategy is the first Development Plan Document to be produced. It is a key document within the Framework and will set out a spatial vision and strategic objectives for the area and the strategic policies required to deliver that vision.

A key part of the new system is to involve all sections of the community at an early stage to identify issues and policy options and as such develop a proactive approach to shaping the planning policy framework.

The Core Strategy will outline the main issues, which the Council considers the Local Development Framework needs to address. A number of options and questions are posed throughout the document and comments are welcome on these.

The following section provides an over view of the economic, social and environmental issues facing the District and as such provides the context for the subsequent discussion on the policy options.

It must be emphasised that the LDF and the Core Strategy in particular, will not stand alone. The LDF will be one of the key tools for the delivery of a whole raft of local strategies, to name but a few:

Regional Spatial Strategy,
Regional Economic Strategy,
Sub-Regional Action Plan,
West Cumbria Strategic Forum Masterplan,
Local Area Agreement,
"Sustainable Cumbria",
Nuclear Decommissioning Agenda,
Cumbria Housing Strategy, etc.



Allerdale

Allerdale: A Portrait

Allerdale including part of the borough that lies within the Lake District National Park covers 1,258 square kilometres and is located in the north west of Cumbria and forms part of the north-west region of England. As of 2001, the district had a population of 93,492 and a population density of 75 people per square kilometre, compared with an average of 480 for the North West. Outside the National Park It has 6 main settlements – Workington (24,295), Maryport (11,275), Cockermouth (7,877), Wigton (5,360), Silloth (2,932) and Aspatria (2,718).



The District

The District is one of contrasts. Whilst the majority of the Borough is rural there are major centres of population in the south of the Borough, with the settlement pattern more concentrated than elsewhere in the District. The economic and social history of the area is dominated by coal mining and iron and steel making, the decline of which has left its legacy of economic and social problems. By contrast the rural hinterland, close to the boundary of the Lake District National Park, is characterised by a number of large rural villages which are subject to development pressure. The north of the District is predominately rural with only a handful of substantial settlements. Agriculture and tourism play a key role in this area, with the Solway Coast and National Park being important tourist destinations.

Social Progress

The population estimate (mid 2004) for Allerdale was 95,300. Although, this is an increase on the mid 2003 figure of 94,500, the overall trend over the past twenty years (1982-2002) is one of a decreasing population by approximately 2%. This has been mirrored by a 2% population decrease in the North-West Region as a whole. However it would appear that this trend maybe in reversal. Allerdale's population is projected to grow to 95,900 by 2013 with a further increase to 97,400 by 2023.

Retirement

Approximately 22% of the population are of retirement age compared to 20% for the North West and 19% for England and Wales. This represents an increasing trend within the district when compared to the rest of the country. The

mean average age for Allerdale is 41, compared with an average age of 39 for England and Wales.

Ethnicity

Ethnically, Allerdale does not have a very diverse population, with 99.4% being classed as white and with only 0.6% of the population being made up of other ethnic groups. In terms of religion, Allerdale is predominantly Christian (85.2), with around 9% of the population claiming no religion and just 0.1% following Islam and 0.1% following Buddhism.

Housing Development

In 2001 there were 39,781 households in Allerdale (1991 – 37,867), of which 69% were owner occupied, a figure mirrored in the North West region. In line with national trends there is a growth in single households with 11,604 in Allerdale. This will have implications for future housing developments in terms of house types and number of units required. In addition to this is the rising number of homelessness in the Borough which at present totals 155. The trend towards smaller households will continue and will contribute to rising numbers of households.

House Prices

House prices have risen steadily in the district since 1998. In July/September 2005 the average house in Workington cost around £105,613 as opposed to £44,820 in 1998. As a result of this the need for affordable housing in the Borough is becoming more widespread. Housing needs surveys have been carried in a limited number of villages. However work on establishing evidence of housing need for the

remaining part of the Borough is in progress.

Deprivation

The Index of Multiple Deprivation provides an indication of the level of deprivation that exists in a district. It scores a number of issues as part of the assessment which includes employment, health, education, housing and crime. Overall the levels of deprivation in the Borough are high, with Allerdale being ranked 79th out of 354 Council areas (where 1 is the most deprived and 354 is the least-ODPM 2004).

However across the Borough there is a significant range of deprivation with the most deprived ward being ranked 471 out of 32,482 and the least ranked 31,062 out of 32,482. This places the most deprived ward in the worst 1.5% of the country and the best in the top 5%.

Education

There are a total of 7 local authority secondary schools in the plan area. Grades across Cumbria have constantly been higher than the national average for many years running, and this is reflected in Allerdale. Amongst the working age population, 16% have a qualification of NVQ5 or above, this is only slightly lower than the average for the north-west (17%). Of the total 16-74 year olds, 4% are in further education as full-time students. However this figure hides areas of poor educational achievement particularly in the more deprived areas where up to 38.2% have no qualifications and only 3.2% have NVQ levels 4/5 qualifications.

Community Safety

Compared to national crime levels, Allerdale is a safe place to live. In 2003/04, the total number of offences was 8,090. This was an increase from 6,905 in 2001/02, but this may simply be a reflection of changes in the approach to recording crime. According to the Audit Commission, 58% of Allerdale residents believe that the level of crime in their area has either got better or stayed the same over the last 3 years, this compares to 43% for the national average. According to Cumbria Police (2004/05), these low crime levels are reflected county wide, with 84% of people surveyed feeling safe outdoors after dark and 98% feeling safe outdoors during the day.

Health

Generally the health of Allerdale residents is, on average, good. Life expectancy at birth was 76 for men and 81 for women in 2005, which was higher than the average for the north west of 74 years for men and 79 years for women. In Allerdale, 37% of households had one or more persons with a limiting long-term illness which is mirrored at the county level which is also 37%. However in some more disadvantaged areas of the district the level of good health is significantly lower. The 2001 census indicates that in these areas only 57% of people claimed to be in good health compared to 80% in Allerdale as a whole.

Transport

The Borough has three main road links to the M6 motorway. The A66 (T) forms part of the national trunk road network and as well as



linking with the motorway network it provides a trans-Pennine link to the north east. The two remaining highways (A596 and A595) link the main settlements in the Borough to Carlisle and the M6 motorway.

In terms of rail services the region benefits from the west coast mainline. A local train service along the Cumbrian coast links the main towns to the main line at Carlisle and Carnforth. Bus services link the main settlements but the service becomes increasingly sporadic and infrequent outside the main centres.

More than half the population of Allerdale live in 'sparse or super sparse rural wards, where bus services are limited in coverage and frequency. This affects the attractiveness of public transport and accessibility to further education, services, jobs and leisure activities, particularly for the young and elderly. For example only 28% of Allerdale's 14-19 year old population is able to reach a college within 30 minutes by public transport, and only 70% within 60 minutes.

The poor provision of public transport is reflected in the high level of car ownership. In Allerdale 46% of households own one car, with a further 30% owning 2 or more. (Compared to 29% in England and Wales). 24% of households in Allerdale have no access to a car, this is compared to 27% for England and Wales.

The amount of traffic in the District has steadily grown. In 1993 there was 4565 million kilometres travelled compared with 4946 million kilometres in 1996 and 5456 million kilometres in 2003.

Protection of the Environment

Allerdale's built environment includes 21

conservation areas, approximately 1500 listed buildings, and 80 Ancient Monuments. There is one park registered as historic by English Heritage. However, there are a further six parks in the district that have been designated as local historic interest. The Hadrian's Wall World Heritage Site, which includes the remains of the Roman coastal defences as far as Ravenglass, runs through the Borough.

Bio-diversity and Landscape

The Borough has a diverse and rich biodiversity which is reflected by the number of national and international designations. There are 2 sites of international importance in the plan area, the Upper Solway Flats and Marshes including the Solway Plain Raised Bogs, and the Derwent/Cocker rivers system. There are 17 Sites of Special Scientific Interest (SSSIs), which are areas of national importance for nature conservation or geology and 23 Regionally Important Geological Sites. There are also 171 sites of county importance which have been designated by Cumbria Wildlife Trust as being regionally important but not worthy of SSSI status. In 2004 an assessment of the condition of Allerdale's SSSIs was carried out. It was found that 64% were in a favourable or recovering condition compared to 71% for Cumbria and 75% for the northwest. The Solway coast is designated as an Area of Outstanding Natural Beauty. A significant proportion of the Borough is within the Lake District National Park and therefore outwith the Plan Area. However, within the Plan Area on the edge of the National Park are areas designated as "County Landscapes" for their landscape character.

In terms of woodland cover this has steadily increased with 4.59% of the area having tree

cover in 1947 compared with 11% in 1998. A large proportion of which is the result of planting schemes carried out by the Forestry Commission.

Water

The rivers in Allerdale are generally good although there is potential for pollution from agriculture and industrial spillage. The Derwent/Cocker river system is particularly high quality.

Flooding risk is a factor in some parts of the Borough particularly in settlements located close to main rivers and along the coastal strip. It is estimated that approximately 2,182 properties are located in Flood Risk zone 3 which are areas most at risk to flooding. The Council is currently undertaking a Strategic Flood Risk Assessment for the plan area to clearly identify the areas at risk of flooding and will form part of the evidence base.

The District beaches are all considered of good bathing quality.

Land and Soil

Allerdale has significant areas of undeveloped land, mainly agricultural, which it is important to conserve both in terms of landscape character and efficient use of land. By contrast the Borough also has a significant number of derelict and contaminated sites that are a legacy of previous industrial uses and are concentrated in the main settlements. Allerdale includes the largest single brownfield site in the North West Region, at the former armaments depot at Broughton Moor, of 400 hectares.

Government policy requires that brownfield sites be developed in preference to green field sites. In 2004/05 only 39% of new dwellings were completed on brownfield sites compared with 46% in Cumbria and 71% in the northwest. More recent indicators show an increase in this figure.

Waste and Recycling

The majority of Allerdale's waste goes to landfill and the amount of waste collected continues to increase. In 2002/03 492kg of waste per person was collected. This rose to 518kg in 2003/04. This is compared to the national average of 439kg per person.

Recycling of waste is a key Government aim. In 2003/04 only 9% of Allerdale's domestic waste was recycled compared to 15% for the northwest and 13% nationally. However the District trend is one of improvement from 4% in 2001/02. Since 2003/04 Allerdale's performance has dramatically improved to 29.6% of domestic waste, well above targets.

Economic Profile

Allerdale's economic structure is set out in the table below:

Employment Type	Numbers Employed	Percentage %
Agriculture/Fishing/Forestry	569	1.6
Energy/Water	218	0.6
Manufacturing	6,903	20.1
Construction	1,728	5
Distribution/Retailing/Hotels/Catering	10,586	30.9
Transport/Communications	1,216	3.5



Banking/Finance/ Insurance	3,322	9.7
Public Administration	7,945	23.2
Other Services	1,802	5.3
All Industries	34,286	100

Employment

The two principal areas of employment in the Borough are manufacturing and distribution. Both sectors are above the national average and reflect the District's past and continued reliance on manufacturing industry and the growing importance of tourism to the area. In 2004 there were 27,209,300 visitors to the District who spent £216,800,000. This was an increase of 1% from 2003. However the banking and finance sector is under represented with only 10% compared to 20% in England and Wales.

The lack of growth in new start up business and lack of diversification in the local economy is reflected in only 1.6% new business start ups in 2003.

Economic Activity

Overall Allerdale's economic activity rate of 77.1% is slightly over the regional average of 76.5%. This figure masks serious areas of deprivation in the Borough where economic activity can be significantly lower. Within the index of multiple deprivation the most disadvantaged areas in the Borough have 7.4% of people who are employment deprived in terms of ability to obtain employment due to poor skill levels etc. this is compared to a national average of 5.4%. The unemployment

rates reflect this with rates double the average across the district. This is also translated in lower wages with average wages at £310 per week in those areas compared to £440 for Allerdale as a whole.

Agriculture

The agricultural sector has also experienced decline in recent years with the impact of the foot and mouth outbreak and other structural changes particularly relating to subsidies. Farm diversification schemes are now coming forward to supplement farm incomes. Mirroring the national trend, farms are increasing in size. But there is also a trend towards more small holdings and hobby farming.



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Wealth creation

The technical measure of wealth creation is 'Gross Value Added' (GVA) – the amount of value that the economy collectively adds to the value of goods and services, which it buys in. Between 1995 and 2001, Cumbria's GVA grew by just over 13%, which was much lower than the northwest's GVA growth rate of 38%.



A Spatial Vision for Allerdale

Allerdale will, in 2021, be instantly recognisable as the Allerdale of today in that it will have retained the vast majority of its positive spatial characteristics. The scale of new development will have been appropriate to the needs and aspirations of Allerdale's various communities and in places will have been transformational in promoting the regeneration and enhancement of our most deprived communities.



The principles of sustainable development will have been at the centre of all decision making on environmental, social and economic issues. Transformational, major development will have been confined to the larger urban areas of West Cumbria. Elsewhere, development on a more modest scale will have taken place to support the smaller urban communities, and in the more sparse rural areas will have been of an appropriate scale and located to support existing facilities.

All new development will have been sensitively located and designed. Environmental and heritage assets will have been given proper protection and where appropriate, enhanced. The amount of greenfield land taken up by development will have been minimised and the best use made of existing buildings and previously developed land.

House building will have taken place to meet the needs of all communities, including the need for affordable housing. In some communities housing market restructuring will have taken place through a combination of renewal and new build such that all Allerdale's housing markets meet the aspirations and needs of Allerdale's communities, and everyone has access to a decent home that meets their needs.

In short the Core Strategy will embrace and endorse the Vision of the Community Strategy prepared by West Cumbria Strategic Partnership:

“A community which is innovative and sustainable, and offers all its people, as

individuals and in communities, a quality of life which enables them to play a full part in our society, through their work, their leisure, and their social networks.”

Q1 Do you agree with the Vision?

Q2 Is the Vision a fair reflection of the needs and aspirations of the Community?

Elements of the above Vision will directly inform and guide the Spatial Objectives, basic principles and policy options of the LDF and so it is an important foundation upon which the LDF will be built.



Spatial Objectives

The proposed Spatial Objectives are based upon a realistic view of the constraints within which planning policy works. The Council as a Local Planning Authority does not have a free hand to institute policies as it sees fit. Our policy must generally conform with policy at a national level, as enshrined in the Government's Planning Policy Statements (PPSs), at the regional level with policy in the Regional Spatial Strategy (RSS) of the North West Regional Assembly, and for the time being, with Policy in the Cumbria and Lake District Joint Structure Plan (JSP) which was recently adopted by Cumbria County Council and the National Park Authority.



Nevertheless, the proposed objectives are aspirational, and where appropriate, are transformational. They take into account the Council's corporate aims, wider sustainability objectives, and the objectives of the Community Strategy.

- To plan, manage and enable development to meet the needs of the whole community.
- To protect and enhance the environmental, heritage and other cultural assets of Allerdale.
- To focus the majority of development into the main towns (Key Service Centres) and villages (Local Service Centres) of Allerdale.
- To ensure that the design and location of all development respects the character and local distinctiveness of Allerdale and promotes inclusiveness, safety, well being, and quality of life.
- To ensure that the natural and built environment can, where appropriate, be enjoyed by all people, now and for generations to come, and thereby, contribute to health, quality of life, and economic prospects.
- To support and enable transformational development in appropriate locations, to support the local economy and regenerate the most deprived communities.
- To support and enhance town centres. To support and enable development in sustainable locations to support rural communities.
- To protect and enhance community facilities and services, and to maximise their accessibility.
- To protect the countryside and important landscapes from unnecessary and/or damaging development.
- To encourage the use of natural resources in the most sustainable way including re-cycling and the re-use of previously developed land and buildings.
- To minimise the energy requirements of development and to encourage the use of renewable energy sources where appropriate, in order to mitigate the impact of climate change.
- To prevent pollution and minimise carbon emissions to further mitigate the impact of climate change.

Q3 Are these Objectives comprehensive?

Q4 Are they appropriate?

Q5 Do they provide appropriate long term aims?



Issues & Options for:

- i. Basic Principles
- ii. Policy Approaches

The Core Strategy must establish the overarching spatial planning principles and policies which will provide the context for all the policies and land allocations in the Local Development Framework. Some of these fundamental principles are already largely well-established through precedent and strategic guidance at national, regional and sub-regional levels. It is important, therefore, to realise that the Borough Council has only limited discretion concerning certain spatial principles and policies.



i. Basic Principles

This Section puts forward certain Basic Principles to guide the Core Strategy and the rest of the LDF.

1. Principles for the Scale of Development

The Regional Spatial Strategy (RSS) includes targets for both residential and commercial development. The target for residential development for Allerdale outside the Lake District National Park is 267 dwellings completed per year for the period 2003-2021, giving a total of 4800 new dwellings in the 18 year period.

Historic trends in house building are:

10 year average 1993 – 2003 – 256 units per annum

5 year average 1998 – 2003 – 252 units per annum

On the basis of the above figures the RSS requirement of 267 per annum appears to be sufficient to continue past trends in house building, but might we aspire to a higher figure as part of a regeneration strategy for Allerdale and especially for the coastal towns and villages of West Cumbria?

Q6 Is the RSS requirement for 267 dwellings per year in Allerdale sufficient to meet the needs of the community?

Q7 Should Allerdale seek a higher figure in order to boost the local economy and underpin regeneration in West Cumbria?

In considering these questions it is important to give thought to the impact of introducing more dwellings into a housing market area than that market can sustain. The result could be an increase in the vacancy rate and a decline in demand for dwellings at the “lower” end of the existing housing stock. It is however, possible to replace houses that are demolished, on a one for one basis, and this could give the Council greater scope for restructuring local housing markets.

Q8 Should the Council consider implementing a programme of housing clearance as part of its housing strategy?

Q9 If so, where and to what scale?

With regard to commercial and employment development, the RSS is not District Specific and anticipates that, on average, 18.8 hectares of land in Cumbria will be developed each year. It will be up to the Cumbrian Districts, the County Council and other partners to apportion this figure between the Districts. Therefore, the Borough Council has very little discretion to prescribe the scale of commercial development, although we have some control over location.

2. Principles for the General Location of Development

The location of future development, both residential and non-residential, is fundamental to the pursuit of a generally Sustainable Development Plan Strategy. Whilst the Council has some discretion to control the location of

development there is much guidance and policy at National and Regional levels which constrains the ability of Allerdale to act with a free hand.

In a nutshell, that guidance may be summarised as follows:-

- Most new development will be directed to the larger towns and urban areas, to be designated Key Service Centres (KSCs). In Allerdale these are: Workington, Maryport, Cockermouth, Wigton, Silloth and Aspatria.
- In rural areas development will be concentrated in those villages with the most local facilities. The scale of development to be appropriate to local circumstances. Such settlements to be designated Local Service Centres (LSCs). It is in the designation of these that the Council has the most power over the location of development.
- In the open countryside new development will be restricted to that which is required for essential purposes (e.g. agriculture, horticulture, forestry) or to that which has a specific locational requirement (e.g. infrastructure).

Therefore, it is in the choice of Local Service Centres, and in the definition of the “open countryside” where the Borough Council will have significant discretion and this will be considered below in the Policy Options section. Another area where we have discretion is in how much emphasis is placed upon the concentration of development into the KSCs and LSCs.

Q10 On what basis should the Council decide the approximate proportion of new development (mainly housing) to be apportioned to KSCs, LSCs etc.

Should it reflect existing population figures?

This would lead to approximately:

Workington/Seaton	36%	(96 dwellings per annum)*
Maryport	13.5%	(36 dwellings per annum)
Cockermouth	9.6%	(26 dwellings per annum)
Wigton	6.5%	(18 dwellings per annum)
Silloth	3.5%	(9 dwellings per annum)
Aspatria	3.2%	(8 dwellings per annum)
Rural Areas	27.7%	(74 dwellings per annum)
	100.0%	267 dwellings per annum in the RSS

*This figure in brackets would be the number of dwellings per year based upon the target figure of 267 for Allerdale (outside the National Park) in the RSS.

Should it reflect past building rates? Based upon the past 5 years building figures this would result in the following distribution:

Workington/Seaton	25%	(67 dwellings per annum)*
Maryport	11%	(29 dwellings per annum)
Cockermouth	22%	(59 dwellings per annum)
Wigton	14%	(37 dwellings per annum)
Silloth	2%	(5 dwellings per annum)
Aspatria	3%	(8 dwellings per annum)
Rural Areas	23%	(62 dwellings per annum)

*This figures in brackets would be the number of dwellings per year based upon the target figure of 267 for Allerdale (outside the National Park) in the RSS.

Should the Council take a more deliberately sustainable approach and promote a more concentrated distribution of development, for instance:

Workington/Seaton	40%	} 80%	
Maryport	15%		
Cockermouth	10%		
Wigton	8%		
Silloth	3.7%		
Aspatria	3.3%		
Rural Areas	20%		

OR

Should the distribution be based upon local circumstances e.g. environmental constraints, the availability of brownfield land, regeneration initiatives, etc. Such a distribution would be likely to lead to a greater concentration in Workington and Maryport, and significantly less in Cockermouth and the rural areas.

In considering these options it is important to bear in mind that it will be difficult to “boost” one town unless a restrictive policy is pursued elsewhere. Also, by being restrictive in an area of high demand, problems of housing affordability may be created or exacerbated.

3. Principles for choosing and prioritising sites for Development

Again, many of the criteria by which the Council must choose sites for development are laid down by national and regional guidance. At national level Planning Policy Statement 3 (PPS 3) “Housing” requires Local Planning Authorities to allocate sufficient “readily available” land to meet at least a 5 year supply of housing land. For the following 10 years specific allocations should be made where possible, but alternatively, broad areas of search may be identified in the Core Strategy.

The criteria for site selection can be summarised as follows:

- (i) The first priority is to seek previously developed (brownfield) land and buildings in the centre of towns and villages;
- (ii) Then brownfield land and buildings elsewhere within the built up areas of towns and villages;
- (iii) Next would come brownfield land and buildings on the edge of the built up area;
- (iv) Only then could Greenfield land be considered, firstly Greenfield land within the built-up area;
- (v) Then Greenfield land on the edge of the built up areas of town and villages, preferably in sustainable locations.

Planning Authorities have no real discretion to vary this sequence but they can create a housing trajectory which prescribes which brownfield sites should be developed first and then the sequence of Greenfield sites. It will be difficult to justify phasing a Greenfield site before an appropriate brownfield alternative, unless there are compelling local circumstances.

One issue over which the Council does have some control is the area within which sites will be compared, i.e. the area, for instance, within which we might search for an alternative brownfield to a Greenfield site. How big should such areas be? For instance, should Greenfield sites in Dearham await the development of brownfield in Maryport?

Q11 On what geographical basis should the Council seek to implement a sequential approach to the development of brownfield and Greenfield land, i.e. how widely should the area within which sites will be compared be drawn? Should it be

- a) within the whole Borough? (outside the National Park)**
- b) within Housing Market areas as defined by the Housing Strategy?**
- c) within the same settlement?**
- d) within the same settlement but potentially including closely related settlements if circumstances justify it?**

4. Basic Principles for Housing

The Cumbria Housing Strategy has the following Vision:

“Our vision is that Cumbria will have balanced housing markets supporting the social and economic changes that our County will undergo over the next 20 years”.

The definition of a balanced housing market for this purpose is “where local people can afford to find a home and a place where they want to stay”. In other words, a market which gives everybody, irrespective of their resources, access to a home which suits them. The Core Strategy will endorse this vision.

Further guidance at National and Regional levels again constrains the Council’s policy on housing. Planning Policy Statement 3 “Housing” and policies within the RSS mean that the Council will seek to control the scale, phasing and type of housing to be delivered during the plan period to meet the needs of the whole community. In order to inform this process the Council is in the midst of a programme of local housing market assessments.

In summary therefore, the principles that the Council will pursue for housing development will be as follows:

- To provide the opportunity for all sections of the community and all types and sizes of household to access decent housing that is affordable to them.
- To provide for and manage the supply of housing land in all parts of the Borough, outside



the Lake District National Park, to meet strategic requirements and local need.

- To seek sustainable locations for all housing developments in line with the above principles for the location of development.
- To deliver well designed, high quality living environments.
- To ensure that new housing development makes appropriate provision for necessary local services and infrastructure.

Whilst these principles are largely fixed, the Council will have some discretion to prescribe the distribution and location of housing development and this issue is considered in more detail below in the Policy Issues and Options.

5. Principles for the Natural Environment

Strategic guidance for the natural environment is contained in PPS 9: “Planning for Bio-Diversity and Geological Conservation”, and in the policies of the RSS. In summary the principles we must follow are:

- To protect and, as appropriate, enhance, important landscape features, and areas of nature conservation for their scientific, geological, or ecological interest, which together constitute the natural assets of the Borough.
- To manage the impact of development on the natural environment in order to:
 - (i) Minimise the risk of environmental damage.

- (ii) Protect the character of the countryside.
- (iii) Enhance bio-diversity.
- (iv) Enable appropriate development of renewable energy resources and encourage the use of natural resources in the most sustainable way in order to mitigate the impact of climate change.
- (v) Protect the best and most versatile agricultural land.
 - Give protection to and, where appropriate, enhance the landscape character and bio-diversity of local important landscapes and particularly the Solway Coast Area of Outstanding Natural Beauty.
 - To enable the whole community to experience and understand the natural environment.

The Core Strategy will endorse the Community Strategy and Allerdale’s own Corporate Improvement Plan in their emphasis on a high quality environment in making Allerdale a great place to live.

6. Principles for the Built Environment

Local Authorities have a statutory duty to protect and conserve the heritage assets of their areas. In addition there is much guidance at national level in PPSs concerning the management and quality of the built environment. Therefore, at the level of principles, the Council has little discretion again to pursue its own policy line.

- To conserve and enhance the character of

Allerdale's built environment, particularly its historic features, in recognition of the contribution they make to the quality of life of local communities.

- To contribute to the enhancement of the public realm, particularly the environmental quality of town centres and local commercial centres, by encouraging high quality design and by making them safe and attractive locations to live, work and visit.
- To seek high quality design in new developments to maintain and enhance local character whilst encouraging high quality innovative modern design where appropriate.
- To ensure that, where appropriate, new development is inclusive and accessible to all the community.

7. Principles for Transport and Accessibility

Allerdale Borough Council is not a Local Highway Authority and so has little control of highway or transport matters. Nevertheless, the Council is committed to working with partners to contribute to the reduction of journey times and to increase safe connectivity within the Borough and between the Borough and major conurbations, in order to maximise economic and social prosperity.

The principles Allerdale will follow are therefore:

- To encourage maximum, conflict free, sustainable access across the borough, through the proper management of the existing network, its improvement where necessary and the integration of transport services.

- To minimise the overall need for journeys, whilst seeking to maximise the proportion of these journeys that are made by:

- (i) public transport, bicycle and on foot;
- (ii) rail rather than by road (for both people and freight)

8. Principles for Economic Development and Tourism

The principles to be followed by Allerdale on this issue are already set down in the Community Strategy and Regeneration Strategy, and so there is little room for debate about the principles to be followed by the Core Strategy. Furthermore, there is also, as ever, policy guidance at national and regional levels which the Council must follow.

Therefore, the principles to be followed can be summarised as follows:-

- To support a vibrant and diverse local economy that supports a number of people in work in line with the North West average.
- To make provision for, and protect, land to meet the employment requirements of the borough, and to ensure a good range of sites are available to investors.
- To protect and enhance existing tourist facilities whilst also allowing new tourist development where appropriate, to deliver increased wealth into the local economy through higher visitor numbers and so making Allerdale a great place to visit.



9. Principles for Town Centres

PPS 6 “Planning for Town Centres”, sets down the principles which Local Authorities must follow in their policies concerning town centres. Town centres must be given priority and supported as the preferred location for all retail, leisure and office development. Authorities are also encouraged to develop a hierarchy and network of town centres.

The Council will therefore follow the following principles:

- To actively promote growth and manage change in town centres, as appropriate, in order to maintain and improve their vitality and viability.
- To define a hierarchy and network of centres such that each performs an appropriate role to meet the needs of their catchments.
- To promote town centres as transport hubs, especially for public transport, walking and cycling.
- To promote town centres as the prime locations for retail, leisure and other commercial developments.
- To work with partners to effectively manage the movement of people and vehicles, car parking and access, to and within town centres.
- To promote and enable qualitative improvements to the public realm in town centres in order to complement the above principles.

10. Principles for Services and Facilities

The Local Development Framework must address the issue of local services and facilities. The Government is keen that Local Authorities and their partners should seek to meet the needs of their communities for sports, education and health facilities. The adopted Allerdale Local Plan has included policies to protect existing facilities, including such as village shops and pubs, but LDFs are expected to take a more pro-active stance.

- The Council, with appropriate partners, will address any identified deficiencies in local services and facilities and will seek to facilitate improvements in their level of provision, quality and accessibility, in order to serve both local communities and visitors.
- The Council will seek to retain local shops and other essential community facilities, especially in rural areas and where there are no accessible alternatives.

In conclusion, whilst many of the principles the LDF must follow are already set by guidance and precedent, there may be evidence to suggest a different course of action in Allerdale. However, if Allerdale were to follow any different principles, the reason would have to be compelling.

Q12 Is there any compelling evidence to suggest that any of the above principles should not be followed in Allerdale Borough?

ii. Policy Approaches

This section looks at policy areas in more detail and identifies options, but within the parameters of the above objectives and principles.

The General Location of Development

We have already addressed location in Section 4 above which sets out the principles to be followed; the most important being that most development will be directed to those settlements with the best local facilities. These are Key Service Centres (KSCs) and are already defined being:

Workington
Maryport
Cockermouth
Wigton
Silloth and
Aspatria

The Council will also need to define Local Service Centres (LSCs) in rural areas. Section 4 above has already addressed the basis upon which housing development may be distributed between KSCs and Rural Areas, and it is intended to include a list of LSCs in the Core Strategy within which the development apportioned to Rural Areas will be concentrated.

Q13 Should the Core Strategy include a list of villages (LSCs) where development of an appropriate scale could be located or should it merely include the criteria by which LSCs will be defined at a later stage?

Policy Issue 1 : Housing

The number of additional dwellings to be developed in Allerdale will be established by the Regional Spatial Strategy, and we have already addressed this issue above. We know that most housing must be built in the 6 KSCs named above, but we must now consider the basis upon which LSCs will be defined.

Obviously, the prime consideration must be the type and range of facilities available in a settlement. But which facilities are the most important and which combination of facilities should be available in order to justify designation as a LSC?

Q14 Which local services are most important?

Please rank in order of importance (1 to 8 – with 1 being the most important):

Primary School	
Public House/Hotel	
Village Hall	
Rail/Bus Link	
Shops	
Post Office	
Doctor's Surgery	
Church	
Other (specify and rank)	

Settlement Hierarchy

The adopted Allerdale Local Plan includes a hierarchy of villages:

Local Centres	:	Where considerable growth may be acceptable
Limited Growth	:	Where modest development may be acceptable
Infill	:	Where small scale infill may be acceptable
Restricted Development	:	Where small essential development or conversions may be acceptable

Q15 Should the LDF include a hierarchy of villages, within the LSC designation, similar to that within the Allerdale Local Plan?

The range and type of facilities available in an village determined where it came in the hierarchy. The Local Plan allowed some development even in very small settlements with only 1 or 2 facilities. Current guidance tends to suggest that the LDF should be more restrictive in its choice of villages, designating only those with a good range of facilities, for future development.

Q16 Which facilities should, as a minimum, be present for a village to be designated a LSC?

Q17 Should the LDF take a more restrictive policy stance than the Local Plan by reducing the number of villages where development (i.e. principally housing) will be allowed?

Currently, the number of approvals for houses outstrips the requirements in the adopted RSS and Joint Structure Plan. In order to remedy this the Council has adopted an Interim Housing Policy (IHP), which restricts normal open market housing development to the West Cumbria towns of Silloth, Aspatria, Maryport and Workington, and the larger villages of Dearham, Flimby and Great Clifton. In Cockermouth, Wigton and some large villages only affordable housing is allowed and elsewhere, only essential development is acceptable.

Q18 Should the LDF follow a similar policy to the IHP? Or perhaps a slightly more flexible version of it?

Town/Village Boundaries

The current Local Plan uses development boundaries around towns and villages to control development and make a clear and simple distinction between those places where housing may be acceptable and those areas where it generally will not. The alternative is to have a list of KSCs and LSCs but to have no specific development boundary and to rely on a criteria based policy to control development.

Q19 Should the LDF draw development boundaries around KSCs and LSCs or rely on a criteria based policy to control the location of development?

Remote Areas

There are areas of Allerdale (outside the National Park) where there are few, if any, villages with a good range of facilities. The area south-east of the A595 is one such, only having proper nucleated villages on its periphery e.g. Bolton Low Houses, Ireby, or Caldbeck. If we rely solely upon villages with a good range of facilities such areas would be limited to only essential development. Some such areas, like Rosley, have primary schools.

Q20 Should the choice of LSCs also take into account a geographical criterion if we are to seek a generally even spread of LSCs.

Q21 Or, would such a policy be essentially unsustainable, if the chosen settlements lacked a good range of facilities?

The Distribution of Housing Land Allocation

We have already considered above, the basis upon which housing development may be distributed. There is no doubt that a significant proportion of housing must be directed to the 6

KSCs but how much housing should be allocated to the Rural Areas? Purely on the basis of population about 27% of new house would be in rural areas. There is a case for arguing that almost all housing should be directed to the KSCs which have the best facilities. Only then would there be a real impact on patterns of movement and reducing the need to move in a truly sustainable way.

However, Government guidance is that rural communities should be supported but that Local Authorities should discriminate in favour of those rural communities with the best facilities.

Q22 Should housing land allocations be concentrated solely in the Key Service Centres?

Or

A) dispersed more widely to include the largest LSCs with a good range of facilities?

Or

B) be dispersed more widely still to include smaller settlements with a limited range of facilities?

Or

C) Should rural allocations concentrate on providing housing for local needs or to fill an identified gap in the market, e.g. for the elderly?

Conversion of Existing Buildings

The adopted Allerdale Local Plan (as altered) allows the conversion of buildings to residential almost anywhere except in remote, isolated locations. But residential conversions are only

acceptable in the open countryside after it has been shown that there is no demand to use the building for commercial use. This is in line with government guidance in PPS 7, and that guidance is still in place.

Q23 Should the policy for the conversion of existing buildings to residential use be:

- A) as for new build houses: i.e. only acceptable within KSCs and LSCs?**
- B) in line with current policy in the Local Plan which allows conversion anywhere except with isolated buildings, and, outside KSCs and LSCs, only after a commercial use has been shown to be impractical/unviable?**
- C) as an alternative; as per new build but also to allow unrestricted conversions in smaller villages which may not be LSCs but have a limited range of facilities?**

Affordable Housing

This is a crucial issue in some parts of the Borough where high house prices have caused the local housing markets to become unbalanced. Local people, especially younger people often find themselves priced out of the housing market. This has not been helped by factors such as the sale of former Council housing and the increasing demand in certain

areas for local housing as retirement or second homes.

Allerdale Borough Council has a good record of working with Registered Social Landlords (RSLs) and housing developers to fill the affordable housing needs gap. However, due to methods of funding and issues such as the nature of the process required to bring forward affordable housing, it is true to say that the scale of affordable housing provided locally in recent years has fallen well short of need.

The Council recognises the crucial role played by planning policy, in enabling the delivery of affordable homes. The tools available are:

- To allocate land for affordable housing;
- To require a “quota” of affordable homes on large developments for open market housing; and
- In rural areas to allow affordable housing developments in locations where housing would not normally be acceptable (this is the so-called “exceptions sites “ policy).

The adopted Allerdale Local Plan (as altered) includes policies to enable both “quota” and “exception” sites. However, it does not include any allocations for affordable housing, which is a new power only recently created. In order to ensure that affordable housing remains affordable to local people in the long term the Council uses planning conditions and/or legal agreements.

The Council is in the process of assessing the need for affordable housing across Allerdale. This is by means of a County-wide sample survey and detailed Parish Surveys. The Council will use the evidence that is available to

inform the LDF, both in terms of the scale of affordable housing required and its location.

The location of affordable housing is an issue. At present the Local Plan allows affordable housing to be located even in small villages down to “Infill Village” level, where facilities are likely to be limited. The Local Plan also allows single affordable dwellings be built even in open countryside, if they are well related to a village or group of buildings. Government guidance on the location of affordable dwellings is to focus on those villages with the best facilities.

Q24 Where should affordable housing be located?

- A) Only in Key Service Centres?
- B) Only in Key Service Centres and Local Service Centres?
- C) In KSCs, LSCs and in smaller villages which may not be designated LSCs?
- D) Anywhere where a need arises?

Q25 Should single affordable dwellings continue to be acceptable under the “exceptions site” rule? If so, where should they be acceptable? (See Q24)

Q26 In order to bring forward more affordable housing on “quota” sites, should a fixed quota be imposed on all housing sites? Or, should quotas be flexible to reflect an identified local need?

Q27 It is sometimes said that imposing big quotas of affordable housing on market sites can render the development unviable. If a quota policy is adopted what should the maximum quota be set at?

- A) 20% of the dwellings
- B) 25% of the dwellings
- C) 40% of the dwellings
- D) 50% of the dwellings

Q28 On what size of development should a quota be imposed?

- A) Minimum of 5 dwellings
- B) Minimum of 10 dwellings
- C) Minimum of 15 dwellings
- D) Minimum of 20 dwellings
- E) Other

Should the threshold for quotas be smaller in rural areas?

Gypsy/Traveller’s Accommodation

The Government expects Local Authorities to address the issue of transit sites for the travelling community in LDFs, and if a need is shown, a site or sites should be allocated. If a Local Authority fails to allocate a site, and ensure its delivery, the power to deal with unauthorised sites may be curtailed. The need for a site is currently being investigated.

Q29 If a need for a transit site is shown, how should the travelling community be provided with accommodation?

A) Should there be more than one site?

B) Should the site(s) be located only in the largest urban area?

Or

C) Only where there is the greatest need?

Policy Options for the Environment

The quality of the natural environment is crucial to making Allerdale a great place to Live, Work and Visit. The state of the environment is also an indicator for global warming and potential climate change. The protection and enhancement of the local environment is therefore central to the local quality of life and to bio-diversity. Not surprisingly Government guidance is that Local Authorities should seek to protect the environment and to enhance bio-diversity. The main question for the LDF is how this can be done.

The Landscape

In addition to the nationally important Solway Coast Area of Outstanding Natural Beauty Allerdale (outside the National Park) possesses significant areas of landscape value. Some of these are identified in the current Local Plan either as Areas of Landscape of County Importance or Locally Important Landscape Areas (LILAs). Policy for these areas has been used to resist proposals that might damage their

special integrity and character.

However, recent policy guidance in PPS 7: “Sustainable Development in Rural Areas” advocates a different approach, the use of Landscape Character Assessment, and carefully worded criteria based policies instead of local designations. In 1996 the Countryside Commission, with English Heritage produced a landscape character map of England this gives the picture of landscape character at national level. Since then Cumbria County Council has carried out a more detailed assessment of Cumbria outside the National Park. In Allerdale this has identified 6 broad landscape classifications:

- Estuary and Marsh: } Solway Firth & Coast
- Coastal Margins: }
- Lowland; majority of Allerdale:
- Main valley; Derwent valley;
- Intermediate and Moorland Plateau; Dean Moor
- Higher Limestone; northern fringes of the National Park

Obviously, therefore, outside the Lake District National Park and the Solway Coast Area of Outstanding Natural Beauty, the Council may have to rely on criteria based policy to protect landscape character. However, there may still be justification to continue with local designation in some form.



Q30 Notwithstanding guidance in PPS 7, should the Council:

- A) Continue to define local landscape designations?
- B) Not identify any local landscape designations and rely on general criteria based policies to protect landscapes outside the nationally designated landscapes, i.e. Solway Coast AONB?

Urban Landscape: Green Space

There are, within the towns and larger villages, stretches of green space (not necessarily public open space) which are important because of their contribution to the character of these areas. As a visual amenity they provide variety in the urban scene and act as positive elements which people enjoy having near them. Many such areas also offer opportunities for formal and informal recreation, for wildlife habitats, and so can make a significant contribution to the quality of life.

The adopted Allerdale Local Plan identifies some such areas, with a policy to protect them from damaging development. However, by no means does it identify all such areas and also relies on a criteria based policy to protect appropriate unidentified areas.

Q31 Should the Council continue to protect important urban (including village) green space from damaging development? If so, should the Council:

- A) Not identify any such areas, but use general criteria based policies to protect them?
- B) Continue to identify some such areas for protection but also use criteria based policy to protect unidentified areas?
- C) Attempt to identify as many such areas as possible: in this option it is almost certain that the Council would still need to cover the possibility of seeking to protect an unidentified space as in (B) above.

Q32 Should private land be protected as green space?

Bio-diversity

Put simply, bio-diversity is the population and range of wildlife (both flora and fauna) in an area. Bio-diversity is an important indicator for the health of any environment and it is well known that access to wildlife is good for people's well-being.

There are various formal designations for wildlife sites which reflect their importance:

International Designations:

- Ramsar Sites
- Special Protection Areas
- Special Areas for Conservation



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National Designations:

- Sites of Special Scientific Interest
- National Nature Reserves

Local Designations:

- County Wildlife sites
- Local Nature Reserves
- Regionally Important Geological/ Geomorphological Sites

Allerdale has examples of all these designations and has some particularly important examples of some. The adopted Local Plan includes policies to protect them all.

In addition to designated sites, certain wildlife species, both plants and animals, are designated for protection by legislation and the Local Plan includes policies to protect them.

Recent good practice also encourages Councils to protect and enhance relevant sites and habitats and in particular those sites which form wildlife corridors, or which are isolated and would benefit from enlargement or from connection to other sites. In this respect the current Local Plan has not been very pro-active but this perhaps reflects more a lack of data and of opportunity than a lack of will. The Council can only act to enhance/enlarge sites and habitats as part of development proposals or on sites it owns.

Q33 Should there be a more pro-active approach to protecting and enhancing bio-diversity/habitats as part of new development?

Q34 Should the Council be more active in acquiring, designating and managing more Local Nature Reserves?

Q35 Are there undesignated areas of the Borough worthy of protection and enhancement?

Flooding

Recent serious flooding has caused the Government to adopt more restrictive guidance on development and flooding in PPG 25. This categorises land at risk of flooding into 3 Risk Zones from low to high risks, and gives guidance on the type of development acceptable in each zone.

In Allerdale there are substantial developed areas which will fall into the high risk zone, but which must be allowed to develop in the future. Therefore, policy will have to be flexible enough to allow some development in high flood risk areas, but in what circumstances and up to what level of risk?

Q36 What development should be allowed in high flood risk areas?

- A) No development (both river and coastal)?
- B) Only essential development, e.g. Infrastructure?
- C) Development for which there is no preferable, sustainable, alternative site?
- D) Allow development with mitigation/ protection measures even in high risk areas?



Built Environment

Cumbria has a very distinctive, very simple, local character in its vernacular architecture and streetscape. Many of Allerdale's towns and villages have areas and buildings of historical importance.

There are also the remains of our ancient past. There are various formal designations which can be used to protect this heritage:

Conservation Areas – to protect areas of particular historic character;

Listed Buildings – to protect individual buildings of architectural or historic interest; and

Scheduled Ancient Monuments – to protect the historic and archaeological remains of our past.

The Council has a statutory duty to seek to protect and enhance the heritage assets of the Borough. The long established policy approach to Conservation Areas is to protect and wherever possible, enhance their character. The designation of Conservation Areas brings many benefits, including controls over demolition, minor development and the protection of trees, the loss of which could erode the special character and appearance of these areas.

The Council has a further duty to periodically review the boundaries of existing Conservation Areas and to consider the designation of new ones. Currently, the Council is carrying out a programme of boundary reviews, and the preparation of management plans, for all 21 of Allerdale's existing Conservation Areas. There are no current proposals to designate new Conservation Areas.

Q37 Are there any historic areas of Allerdale's towns and villages which justify designation as new Conservation Areas? If so, where?

Allerdale has a significant stock of traditional buildings which justify "Listing" as of historic or architectural importance. There are over 1000 of them and the Council has a statutory duty to protect them and ensure that any alterations to them are sympathetic to their characters. This will continue.

In spite of this, some listed buildings remain "at risk" if their condition is poor or very bad. English Heritage compiles a survey of listed buildings at risk but only a small number of Allerdale's currently appear on it. The Council is actively pursuing the repair and enhancement of these with their owners. However, Grade 2 properties are not surveyed and so there may be a significant number which are at risk.

Q38 Should the Council be more pro-active in seeking the repair and enhancement of Listed Buildings "at risk"? Should the Council compile a survey of Grade II Listed Buildings to gain a more accurate picture of the state of all the Listed Buildings in the Plan Area?

Allerdale Borough Council does not control the listing of buildings or the scheduling of ancient monuments. This duty lies with English Heritage. However, it is being suggested that the Council



should compile a local list of buildings which merit preservation but are not formally “listed”. This would be a significant undertaking but it may be possible to progressively compile such a list with the help of local interest groups and town and parish councils.

Q39 Should the Council compile a ‘local list’ of buildings meriting preservation?

With regard to Scheduled Ancient Monuments (SAMs) the Council also is encouraged to protect them from damage. We will work with the County Archaeologist and English Heritage to this end.

Allerdale’s greatest ancient asset is Hadrian’s Wall and the Roman Sea Defences along the west coast. These are designated as a World Heritage Site. Much of the WHS is in the Solway Coast AONB and the AONB Staff Unit will take a more pro-active role in working with partners to protect, enhance and improve access to these sites.

Economic Development

Fundamental to Allerdale’s Vision for the Future is the health of the local economy. Although enormous changes have happened to the local economy in recent decades, there remain areas of concern where further transformation needs to occur. The LDF must play its part in facilitating this change.

Employment Land Requirements

Allerdale has traditionally retained a large supply of land allocated for Employment purposes. This has been partly deliberate and partly as a result of the presence of Lillyhall Industrial Estate within the Borough where there are significant reserves of land. Lillyhall serves West Cumbria as a whole and the Council (in agreement with the County Council) has taken the view that Allerdale should retain such a large supply.

Preliminary figures for March 2005 show that Allerdale has a total of 134.29 hectares of employment land available with only 6.6 hectares having been developed in the last 5 years. Obviously, such a supply will last a very long time and there may be a case for land allocations to be more focussed on that which is likely to come forward in the foreseeable future.

Q40 Should Allerdale continue to retain a generous supply of allocated and committed employment land in the LDF?

The RSS envisages that 18.8 hectares of employment land will be developed in Cumbria as a whole, each year. It expects 20 years supply to be made available in LDFs i.e. about 360 hectares. It will be up to the Cumbrian Local Authorities working together to agree the distribution of this requirement between the Districts.

Employment land is sometimes under pressure for other development, for example, housing and retailing in Cockermouth. If there is an

oversupply of employment land, it may be difficult to protect employment land for the purpose it was intended.

Q41 Should land be allocated?

- A) To retain a generous supply of employment land?**
- B) In line with RSS requirements?**
Or
- C) In line with past building trends?**

Regeneration Strategies in West Cumbria seek to improve the quality of jobs available and the value added accruing to them. This is because Cumbria has recently seen a significant relative decline in local Gross Value Added (GVA) in the local economy.

There may be a case for policy to focus on encouraging specific business needs.

Q42 Should employment policy focus on:-

- A) Specific business needs e.g. high tech, knowledge based, or manufacturing sectors?**
- B) Should it be more flexible and open to a wide range of employment uses for each site?**

The location of employment development is an issue. Sustainable development principles would lead to employment sites being in close proximity to residential areas (subject to amenity considerations) in the towns with the best facilities. However, at present employment

allocations are focussed on Lillyhall, a free standing industrial estate separate from any substantial urban area. On the other hand Lillyhall is easily accessible from the whole of West Cumbria.

Q43 Where should allocated employment sites be located?

- A) In the Key Service Centres only? (Particularly large sites?)**
- B) In Key and Local Service Centres, at an appropriate scale?**
- C) Throughout the Borough?**

Q44 Is too much employment land concentrated at Lillyhall?

Economic Development in the Countryside

Allerdale Borough Council has long recognised the importance to the local economy of existing employers in the open countryside. Part of this approach has been to allow, as far as is appropriate, for existing employers to expand or intensify their businesses in situ, as long as this does not have an adverse environmental impact. Another part of the same approach has been to allow for farm diversification and the priority given to commercial uses when a conversion of a building in the open countryside is proposed.

Within defined villages new-build commercial developments have been acceptable but the Council has taken the view that other than in the above cases, new businesses should not be allowed in open countryside.

Q45 What should policy towards employment development in Rural Areas and Countryside be?

- A) Continue to allow new businesses within designated villages and, in open countryside, to allow the development of existing businesses, farm diversification and conversions of appropriate buildings.**
- B) As (a) above, but also to allow new businesses in open countryside where there would be no adverse environmental impact?**
- C) To allow employment development only in Local Service Centres, plus farm diversification and conversions of existing appropriate buildings?**

The Council will have some discretion to choose the location of existing buildings which may be acceptable for conversion. Currently, the Local Plan resists the conversion of isolated buildings.

Q46 What should be the Council's policy towards conversions of buildings in the countryside?

Should it:

- A) Continue to resist the conversion of isolated or remote buildings?**
- B) Be more restrictive and only allow conversions as part of farm diversification or the expansion of existing businesses?**
- C) Allow conversions even in isolated and remote areas?**

Tourism

Tourism is another area where the usual restrictive policy on development in the open countryside may be set aside. This is in recognition of the fact that much tourism demand is to experience the open countryside. The current Local Plan allows for Tourism development in the open countryside subject to environmental impact, etc. Policy in the Solway Coast AONB is more restrictive. This approach could continue. Alternatively, it could be argued that it would be more sustainable if tourism were subject to the usual principles for the general location of development.

Q47 What should be the policy approach towards new proposals for tourism purposes?

- A) Continue to allow new tourism proposals, and extensions to existing facilities, in the open countryside, with protection given to the AONB.**
- B) Only allow conversions of existing buildings and/or extensions to existing facilities in open countryside, with new businesses being directed to Key or Local Services Centres.**
- C) Allow only small scale tourism proposals in open countryside, including conversions.**

Q48 Should proposals for new-build holiday cottages be treated as tourism or housing proposals? In other words should they be subject to the same sustainable principles as other housing proposals?



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Town Centres

National Policy on town centres is clear, Local Authorities should support town centres as the prime location for retail, leisure and some office uses. It is one of this Council's prime objectives to promote town centres and Workington in particular. The current strategy is to make Workington town centre the focus for comparison retailing in West Cumbria and for other town centres to perform the function of serving their respective catchment areas.

As a corollary to this, guidance also encourages Authorities to resist out of centre retail and leisure developments unless there is no alternative.

Q49 Should Allerdale continue to promote Workington town centre as the main comparison retailing location in West Cumbria?

Elsewhere, the retail role of each town should be to serve their catchment areas to their maximum potential. It is possible that some town centres are not performing to that potential.

Q50 Where there is evidence that a town centre is "loosing" expenditure to another town centre, should the Council actively seek to "clawback" that expenditure by promoting further retail development to improve the retail "offer" of the town?

There is evidence that some shopping streets can lose vitality if a significant number of retail outlets become non-retail such as estate agents or hot food take-aways.

Q51 Should the Council identify "Primary Shopping Streets" where non-retail uses should be resisted if they begin to adversely affect the retail character of the street?

Many town centres have seen residents move away in recent decades, often leaving flats above shops vacant and in a poor state of repair.

Q52 Should residential use be encouraged in town centres?

Leisure

By "Leisure" here, is meant sport and recreation, and not the Leisure uses that are normally found in town centres, e.g. pubs and restaurants. Participation in sport and informal outdoor recreation is known to be a key element in health and well-being.

We have already considered access to Green space and wildlife above.

Q53 Are existing leisure facilities (including sports centres) of the right quality and in the right place?

Q54 Is there a shortage of sports and recreation facilities in certain parts of Allerdale?

A key element of outdoor recreation is Children's Play Space, access to which encourages active outdoor pursuits in Children. It is unfortunate that in the recent past the Council has found the upkeep of some of the play areas it owns too onerous, and this has resulted in the removal of equipment from some and the closure of others. Yet national policy expects the planning system to provide adequate play areas to serve new housing estates.

Q55 Should the Council be more pro-active in improving the provision of children's play space across The Borough?

The current Local Plan includes policy to require housing developers to provide certain types of play space for certain scales of development. The planning system can ensure that these are provided and maintained by the developer in perpetuity.

Q56 Should the Council continue to require housing developers to provide appropriate children's play areas within their developments of a certain size?

Recycling

As a Waste Collection Authority, Allerdale Borough Council has a crucial role to play in providing facilities for recycling and encouraging everybody to recycle where possible. This is all part of a sustainable strategy to minimise the use of finite natural resources and to reduce the volume of waste going into landfill sites. The planning system can play its part in encouraging recycling.

Q57 Should new development make a positive contribution to recycling by including recycling facilities? Should there be a size threshold which triggers such a requirement?

Q58 Should planning policy encourage the use of locally sourced materials in developments?

Q59 Should the use of recycled materials be encouraged in all developments?

Energy Efficiency

Guidance at national and regional level encourages the efficient use of energy, to minimise demand and reduce energy consumption. This should be implemented through a positive policy framework to guide the location, design and layout of development, and require the inclusion of energy efficiency methods. The orientation of buildings can increase solar gain and details of design can store that heat or actively cool a building. The use of materials associated with energy conservation can be encouraged.



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Q60 Should developers be required to include energy efficiency measures in all development? If so, which elements of a development should be controlled:

- Location?
- Orientation?
- Design?
- Materials?

Q61 Should developers be required to submit energy statements with all planning applications (other than domestic extensions) to show how they have incorporated energy efficiency measures in the proposed building?

Renewable Energy

Energy generation and use has become a key policy issue as the potential impact of climate change and global warming has become apparent. European, national and regional policy now all seek to minimise energy use (see above) and at the same time move towards a higher proportion of energy from renewable resources. The Government has set targets of 10% of electricity generated from renewable resources by 2010 and 20% by 2020 and these targets are reflected in the Regional Spatial Strategy. Studies have shown that in order to meet these targets, a significant proportion can be expected to arise from sources such as bio-mass and photo-voltaics.

In order to contribute to meeting those targets, new development could be required to incorporate measures to generate a percentage

of the development's energy requirements from renewable resources.

Q62 Should new development be required to generate a stated proportion of its energy requirements from renewable resources?

Should there be a size threshold for both residential and commercial development which triggers this requirement?

Q63 If so, what proportion would be reasonable and practicable?

Q64 Should developers be required to submit energy statements with appropriate planning applications, showing how the proposal contributes to meeting renewable energy targets? (see also Q 61).

Recent experience shows that developers are concentrating on proposals to produce renewable energy through wind turbines and also that these proposals are proving to be ever increasingly controversial, largely because of their landscape and visual impact. The County Council in partnership with all the District Councils in Cumbria and the National Park Authority are in the process of preparing a Supplementary Planning Document on the assessment of wind energy proposals, and because this will be put through its own public consultation exercise soon, it is not proposed to consider policy options for wind energy development as part of this document.

Transport

Allerdale Borough Council is not a Local Highway Authority, that duty rests with Cumbria County Council, and so the Borough's influence on transport and highway matters is limited. Nevertheless, the Borough does have a role to play and the Corporate Improvement Plan includes the following strategic aim.

“Transport and Infrastructure: By 2011 Allerdale Borough Council will work with partners to contribute to the reduction in its journey times and increase safe connectivity within the borough and between major urban areas to maximise economic and social prosperity.”

National and Regional Policy is also enshrined in the Regional Transport Strategy which forms part of the RSS. This seeks to increase mobility and extend choice in transport modes, with the general aim of reducing transport by road. To secure this means integrating transport policy with policies for the environment and land use.

The LDF has a key role to play in delivering these aspirations through shaping the pattern of development and influencing the location, scale, density and mix of land uses across the Borough.

The County Council has a duty to prepare a Local Transport Plan which must conform with the Regional Transport Strategy in the RSS. The emphasis will be on ensuring that the LDF and the LTP complement each other. The main role of the LDF will be to control the location of development to bring about a more sustainable settlement pattern but this will be quite a challenge in predominantly rural areas like Allerdale.

Q65 Should the majority of future development be directed towards locations where the most sustainable patterns of transport can be achieved, and where a greater choice of transport mode is available? e.g. public transport, cycleways and footpaths?

Q66 Should major development incorporate measures to encourage more sustainable patterns of transport, e.g. cycleways, footpaths? Should developers have the option to pay a commuted sum as a contribution to transport infrastructure? What threshold should trigger such requirements for residential and commercial development?

One area where the Borough Council does have a major role is in the provision and management of public car parks. Local Authorities are encouraged to use their role in car parking to promote sustainable patterns of movement and so it may not always be appropriate to provide car parking in line with maximum demand. A restricted supply of car parking can be used to promote alternative means of transport, especially in urban areas.

Q67 Should more public car-parking be provided in town centres? If so, which towns have a problem?

Q68 In what ways should the Council use the management of car parks to promote sustainable patterns of movement?



Implementation and Monitoring Framework

The Core Strategy must be implemented and must be seen to be implemented. It will be subject to Sustainability Appraisal and the scoping exercise for the Sustainability Appraisal includes a number of statistical indicators which have been chosen to measure the successful implementation of the LDF.

The means of implementation will be through the development control system and the decisions on planning applications. The Core Strategy will feed into this process through the rest of the LDF, i.e. the site allocations and the specific development control policies.

The Council will produce an Annual Monitoring Report which will look at the indicators and make an assessment of the success or otherwise, of policy implementation. If policy is not being implemented or is having the wrong impact the Council must consider whether it may be appropriate to amend the relevant part of the LDF, and how they will set about doing so.

If you wish to comment on the Core Strategy issues and options document please submit them in writing to:

**Regeneration Strategy Manager
Allerdale Borough Council
Allerdale House
Workington
CA14 3YJ**

Or Email: *ldf@allerdale.gov.uk*

Fax: 01900-702848

Alternative Document Formats

This document and the comments form are also available on the Council's website. Further information on the Local Development Framework is also available www.allerdale.gov.uk.

We can produce this document in large print, on audio tape and in other languages if you ask us. If you would like a copy in one of these formats please phone 01900 702767 or 01900 702765