

**Town Centre Review - Addendum  
March 2013**

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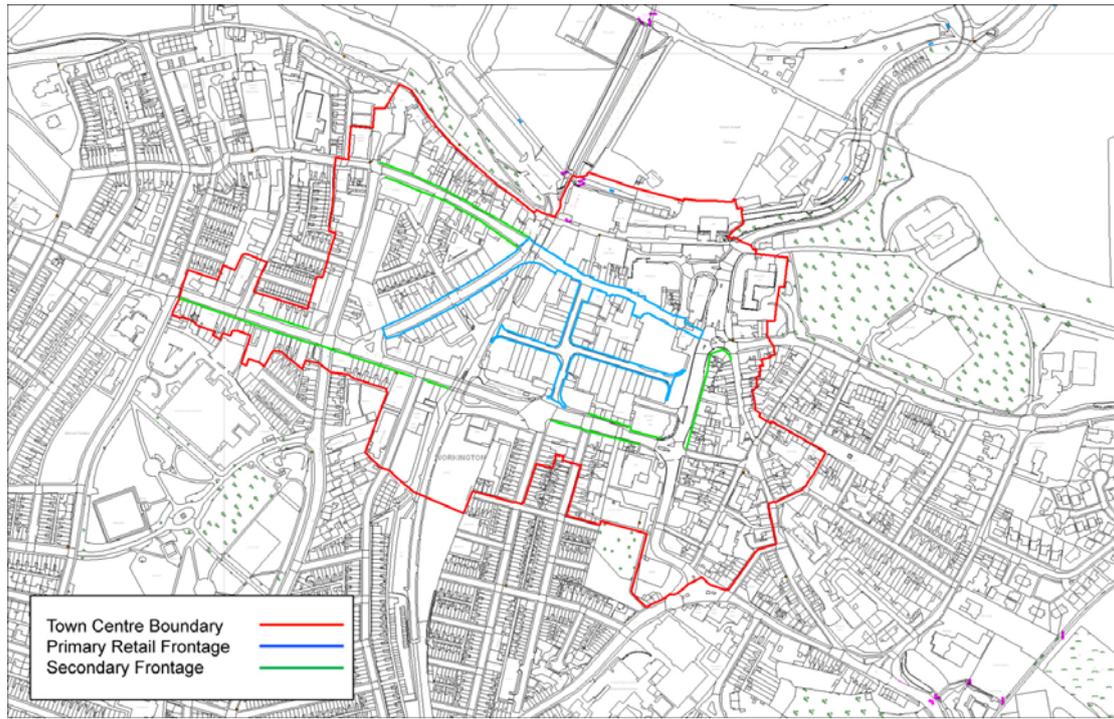
Annex 1 - Comments Received during Consultation

## **1 Introduction**

1. As part of the preparation for the Local Plan, Allerdale Borough Council carried out a number of reviews of its town centres in order to inform policy development in relation to:
  - the definition of town centre boundaries;
  - the requirement for, and definition of primary and secondary frontages;
  - the requirement for, and definition of locally distinctive thresholds for impact assessments.
2. The findings of the Town Centre Reviews were subject to a six week public consultation in June 2012 as part of the Local Plan 'preferred options' consultation. A number of responses were received in relation to the preferred town centre options and, having taken these comments on board, carried out a further round of surveys and revisions.
3. This document updates the 2012 Town Centre Review documents, discusses the changes made to the preferred options as a result of consultation feedback or further survey, and sets out the revised policy as set out in the Allerdale Local Plan.

## **2 Town Centre Boundaries & Frontages**

## 2.1 Workington



### Town Centre Boundary

4. As part of the further review of the town centre policy development, it was determined that some minor changes to the preferred option Workington town centre boundary were appropriate. These mainly consisted of contracting the extent of the boundary to the south and east, to exclude some residential areas which were considered outwith the town centre. A section to the north west of the boundary has been extended and now includes a large vacant church building.

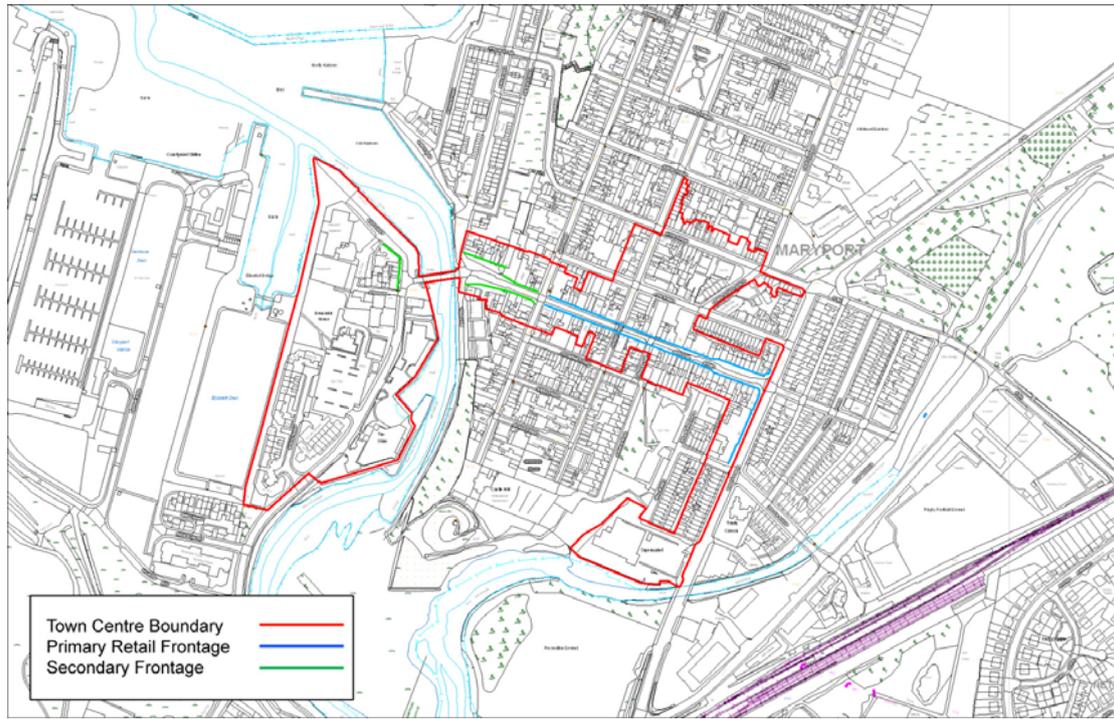
### Primary Frontages

5. After further review, it has been determined that the preferred frontage designations remain appropriate.

### Secondary Frontages

6. After further review, it was determined that some changes to the secondary frontages are appropriate. These include extending the secondary frontage to the north on Washington Street around the corner approaching Ramsey Brow as this is considered an important 'gateway' into the town centre. Secondary frontage policies are also extended along the length of both sides of Finkle Street.

## 2.2 Maryport



### Town Centre Boundary

7. As part of the further review it was determined that some minor changes to the preferred option Maryport town centre boundary were appropriate. These mainly consisted of contracting the extent of the boundary to the north and east, to exclude concentrated residential areas which were considered outwith the town centre and generally inappropriate to support town centre uses.

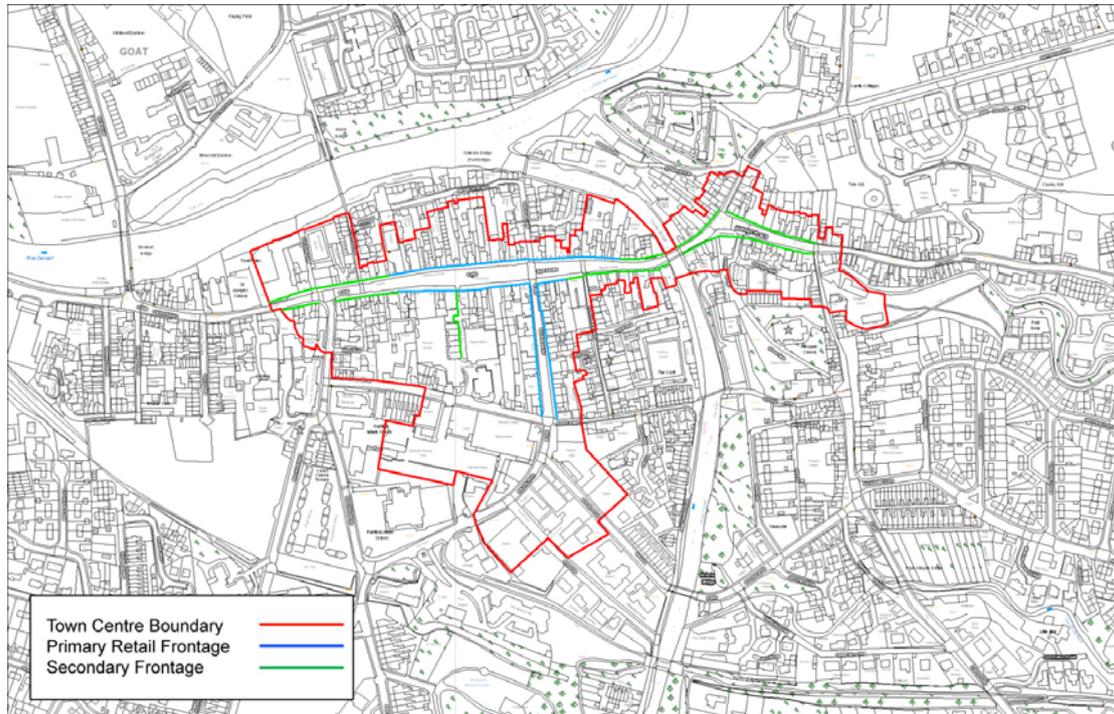
### Primary Frontages

8. After further review, it has been determined that these frontages remain appropriate, however, more clarity has been provided by delineating the fronts of properties instead of whole buildings.

### Secondary Frontages

9. In the preferred options policy, Maryport did not include a secondary frontage area. However, the review has determined that it is appropriate to include an area of secondary frontage between the main high street of Senhouse Street and the marina area. This area contains a number of leisure type uses, pubs, restaurants and museums which provide connectivity between the main town centre area and the marina area and it is considered important to protect this bridge of town centre uses.

## 2.3 Cockermouth



### Town Centre Boundary

10. After a further round of surveys and in response to comments received during consultation it has been determined that a number of changes should be made to the preferred Cockermouth town centre boundary. In relation to the areas to the north of the town, in the vicinity of Waterloo Street and St Bridget's Close and those to the south around Challoner Street it is considered that whilst contributing towards the vitality of town centre activity, these streets are predominantly residential in nature and are unlikely to be suitable for most types of town centre activity. Therefore the preferred boundary has been contracted to exclude these residential areas to the north and south of the town centre.
11. the delineation of the town centre boundary has also been clarified to provide a clear plan as to which buildings were specifically included.

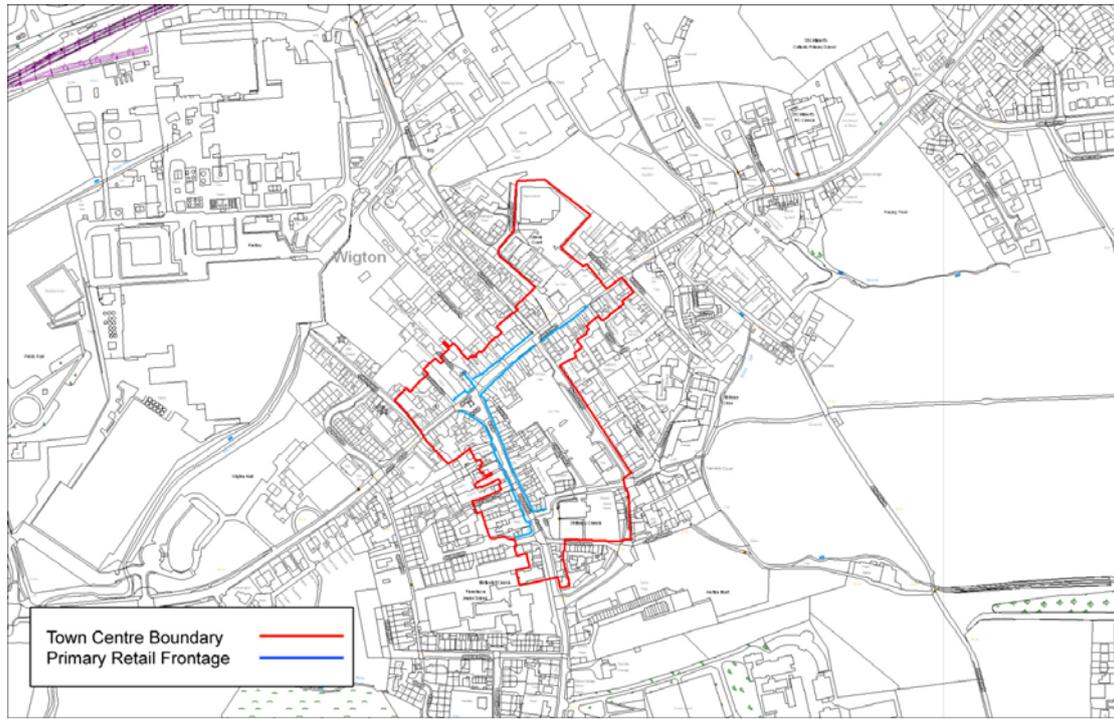
### Primary Frontages

12. The preferred option primary frontage has for the most part, been considered appropriate to remain - with some minor changes. This frontage has therefore been extended along the north side of Main Street to encompass the retail units within, and has been contracted to exclude the former Globe Hotel on the south side which it is considered would be more appropriate within the secondary frontage.

## **Secondary Frontages**

13. Some minor changes to the preferred secondary frontage have been considered appropriate, including, changing a section of the north of Main Street from secondary to primary (as discussed above). The omission of the Lowther Went area of the town centre was highlighted through consultation and, after further review, this has been accepted for amendment and inclusion within the secondary frontage.

## 2.4 Wigton



### Town Centre Boundary

14. After further review it was considered that the preferred town centre boundary remains appropriate. However, the delineation of the boundary line itself has been clarified.

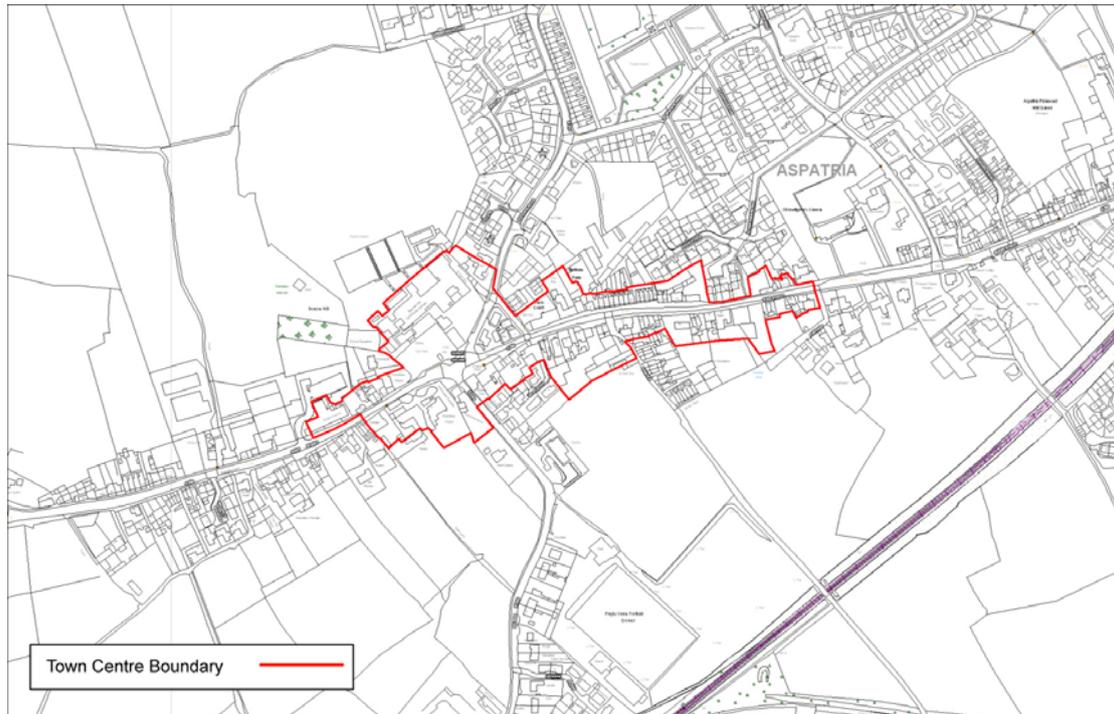
### Primary Frontages

15. There have been some minor changes to the primary frontages as appropriate, including contracting the designation back from the east of King Street. This was due to the reassessment of the number of mixed uses, such as restaurants and takeaways along this section of the street, which did not lend itself to a primary retail frontage. The designations have also been clarified by delineating the fronts of properties instead of whole buildings.

### Secondary Frontages

16. Due to the small scale of the town centre in general it was not considered necessary or appropriate to designate secondary frontages within Wigton and after further review this remains the case.

## 2.5 Aspatria



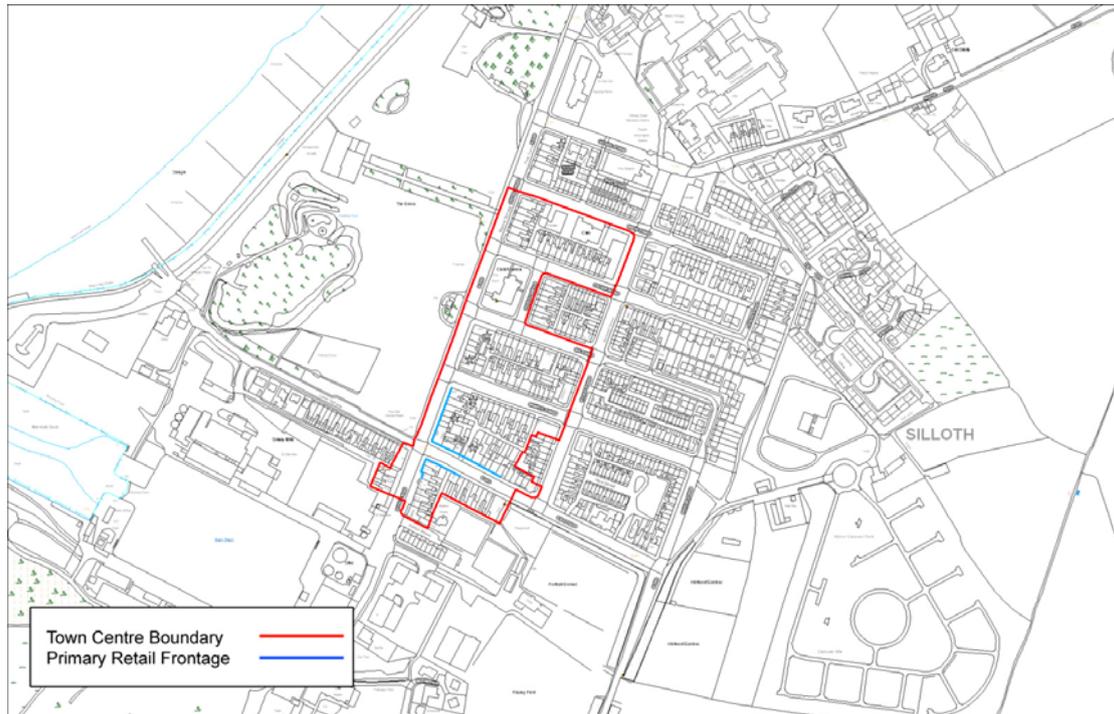
### Town Centre Boundary

17. The introduction of a town centre boundary to Aspatria was received with a great deal of support through consultation.

### Primary Frontage & Secondary Frontages

18. Given that the town centre boundary is to be newly implemented it was not considered appropriate to designate primary or secondary frontages which may impose restrictions on the different town centre uses whilst trying to establish a critical mass of businesses within. After further review, this approach remains appropriate.

## 2.6 Silloth



### Town Centre Boundary

19. After a further review and survey it was considered that two blocks of residential, on Solway Street and between Esk Street and Caldew Street should be excluded from the town centre boundary. These areas are predominantly residential in nature and are unlikely to be suitable for most types of town centre commercial activity.

### Primary Frontage

20. After further review it was determined that some minor changes to the primary frontages are appropriate which include contracting the designation back from the west of Station Road and from the East of Eden Street. These changes were considered appropriate after considering where the core retail businesses were located and where the diversity of uses increased towards the edges of these areas.

### Secondary Frontage

21. Due to the small scale of the town centre in general it was not considered necessary or appropriate to designate secondary frontages within Silloth. After further review this remains the case.

### 3 Thresholds for Impact Assessments

22. National Policy states that the requirement for an Impact Assessment relates only to retail, leisure or office development outside of existing centres, which are not in accordance with an up-to-date Local Plan and which are over
- a) the national default threshold of 2,500sq m; or
  - b) a proportionate, locally set threshold.
23. In essence, this means that a proposal for an out-of-centre development - which has passed the sequential approach to land selection - may also require an assessment to determine its impact upon the vitality and viability of the town centre. This impact is usually related to the scale of the development - hence the need for a size threshold. The requirement only relates to development which does not accord with an up to date development plan, therefore proposals which come forward on land allocated for such uses outside of town centres would not require the Impact Assessment.
24. Due to the rural nature of the Borough many of the town centres within Plan Area are relatively small in size. Therefore it is considered that many 'town centre use' developments which cannot be located within the existing centre, but which are below 2,500 sq m, could have a detrimental impact upon the vitality and viability of one of the smaller centres. For example, an edge-of-centre supermarket of 1,500sq m (similar to the size of the Co-Op in Maryport) could have a detrimental effect if located on the edge of one of the smaller centres such as Aspatria or Sillioth. Yet under the national threshold, there would be no requirement for a developer to address the issue of impact, they would only need to pass the sequential test. This is particularly relevant when considering that the majority of proposals that would be in line with the identified capacity (West Cumbria Retail Study 2009), with the exception of Workington, would fall below the nationally set floorspace threshold.
25. Therefore, the review determined that locally set thresholds, proportionate to each centre within the hierarchy, are appropriate.
26. It should be clearly stated that the requirement for an impact assessment is not indicative of the Council's intension to refuse an application, it is merely a method to asses the impact, if any, of the development upon the vitality and viability of the centre. The impacts which are assessed are outlined in national guidance (Planning for Town Centres: Practice guidance on need, impact and the sequential approach - CLG 2009).

### 3.3 Revisions to Preferred Thresholds

27. A number of comments received related to preferred options local impact assessment thresholds; many of the respondents believed that the levels were set too low and that the justification outlined in the Town Centre Reviews was not clear.
28. The thresholds set out in the preferred options policy were developed by assessing the existing average town centre floorspace in conjunction with an assessment of the current 'health' of the centre. By evaluating historic and existing town centre floorspaces it is possible make an assumption about the size and scale of business likely to come forward in the future. The town centre Health Checks highlighted where towns had deficiencies in retail, office or leisure provision, making them more vulnerable to competition from out-of-centre proposals. By assessing these indicators judgements can be made as to the scale at which out-of-centre development might impact upon the vitality and viability of the centres within the Plan Area.
29. A key objective of the Local Plan and Council Plan is to protect the vitality and viability of town centres. The thresholds set at preferred options gave a clear approach which represented the Council's commitment to this objective and which were based upon local circumstances. For example, the threshold of 50sq m for Aspatria, reflected the current vulnerable status of the centre and it was considered that even a very small out-of-centre development could have a detrimental impact upon its success. However, responses received during consultation highlighted concern that low thresholds were overly onerous to smaller businesses and would discourage development.
30. After further review, it was considered that it is appropriate to base thresholds upon average floorspaces and local circumstance, however it is accepted that the preferred levels may not allow for potential growth and increased prosperity of centres over the plan period. Following this the thresholds have been revised as set out below.

	Average Floorspace (sq m)	Preferred Option - Threshold (2012)	Revised Threshold (2013)
<b>Workington</b>			
Comparison	232	300 sq m	500 sq m
Convenience	310		
Financial & Business	193		
Leisure	315		
<b>Maryport</b>			
Comparison	123	200 sq m	300 sq m
Convenience	251		
Financial & Business	83		
Leisure	132		

<b>Cockermouth</b>			
Comparison	163	200 sq m	300 sq m
Convenience	299		
Financial & Business	83		
Leisure	17		
<b>Wigton</b>			
Comparison	84	200 sq m	300 sq m
Convenience	302		
Financial & Business	134		
Leisure	121		
<b>Aspatria</b>			
Comparison	123	100 sq m	100 sq m
Convenience	192		
Financial & Business	134		
Leisure	165		
<b>Silloth</b>			
Comparison	138	100 sq m	100 sq m
Convenience	168		
Financial & Business	73		
Leisure	234		

## **4 Notes**

### **Primary Frontage**

31. Primary frontages are specific designations of streets or parades within a town centre which are likely to include a high proportion of retail uses which may include food, drinks, clothing and household good.

### **Secondary Frontage**

32. Secondary frontages are specific designations of streets or parades where which provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

### **Town Centre Impact Assessment**

33. Proposals for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, and are over a proportionate, locally set floorspace threshold will require an impact assessment. This will gauge the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal. The assessment will also consider the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made, or ten years for major applications.

## Annex 1 Comments Received during Consultation

The following responses were received during the Preferred Options consultation (June 2012) in relation to policies:

- DM EC10 - Town Centre Thresholds
- DM EC12 - Town Centre Boundaries
- DM EC13 - Frontages (Primary)
- DM EC14 - Frontages (Secondary)

Our response to these comments is set out and any actions we have taken to amend the policy as a result.

TC-Query			
Policy	Consult ID	Comment summary	Response (ours)
DM EC10	3	Concerned that the town centre thresholds are set too low, discouraging retail development within town centres.	The requirement for an impact assessment relates only to retail, leisure or office development outside of existing centres, which are not in accordance with an up-to-date Local Plan and which are over: a) the national default threshold of 2,500sq m; or b) a proportionate, locally set threshold. After further review, we consider that local thresholds being based upon average floorspaces and local circumstance remain appropriate; however we have accepted that the preferred levels may not allow for potential growth and increased prosperity of centres over the plan period. We have therefore increased the thresholds as set out in Town Centre Review (Addendum 2013).
DM EC10	64	It is unclear whether thresholds have been derived from evidence base as they are not justified.	The thresholds are justified within the Town Centre Reviews evidence base documents. However it is acknowledged that the justification required further clarification and this has been set out in the Town Centre Review (Addendum 2013).
DM EC10	438	Sainsbury's strongly object to the floorspace thresholds set out in DM EC10. Our client suggests that the threshold for in-centre development is removed and the threshold at which a requirement for an impact assessment is triggered for out of centre sites should be revised. The maximum figure of 300 sq m (trigger for impact assessment) is significantly below the NPPF default position of 2,500 sq m (para 26) and is considered to be overly restrictive, going against the pro-growth and presumption in favour of sustainable development messages set out in the NPPF. Sainsbury's believe that such a stance is unwarranted without a robust evidence base to support this approach and that no such evidence base is set out by the LPA.	The requirement for an impact assessment relates only to retail, leisure or office development outside of existing centres, which are not in accordance with an up-to-date Local Plan and which are over: a) the national default threshold of 2,500sq m; or b) a proportionate, locally set threshold. After further review, we consider that local thresholds being based upon average floorspaces and local circumstance remain appropriate; however we have accepted that the preferred levels may not allow for potential growth and increased prosperity of centres over the plan period. We have therefore increased the thresholds as set out in Town Centre Review (Addendum 2013).
DM EC10	506	Where is the evidential basis for these thresholds? Why are Wigton, Silloth and Aspatria allocated different thresholds when in the Settlement Hierarchy they are given equal status? If the weaker retail centres are to have sustainability retained, surely they should be allowed greater flexibility/discretion, not less?	The thresholds are justified within the Town Centre Reviews evidence base documents. However it is acknowledged that the justification required further clarification and this has been set out in the Town Centre Review (Addendum 2013). The more vulnerable centres benefit from a lower threshold as it is considered that even small scale out-of-town development could have a detrimental impact upon their vitality and viability.
DM EC10	55	The setting of thresholds for the considering the impact of town centre uses in non town centre locations below the levels of the NPPF is appropriate, however the Allerdale Borough Council must be satisfied that these are not too low. The policy's requirement that the scale of town centre uses in town centre locations be assessed is not expressly stated within the NPPF. Nevertheless, it is important that scales of development at locations be consistent with the settlement hierarchy.	Comments accepted.

TC-Query			
Policy	Consult ID	Comment summary	Response (ours)
		Given this, the proposed approach is considered appropriate.	
DM EC10	289	The Agency has no particular comment but is generally supportive of the thresholds proposed for town centre development and supports the Councils justification that the default national threshold of 2,500sqm is high given the size of the towns in the borough.	Your support is noted

TC-Query			
Policy	Consult ID	Comment summary	Response (ours)
DM EC12	3	Consider town centre boundaries should be drawn up within a local consultation exercise.	The town centre boundaries were drawn up by officers after extensive survey work, being informed by national guidance and local evidence. The consultation exercise has given the local community a chance to express their opinions on the preferred boundaries, and these views have been taken on board. A further round of surveys has allowed us to consider these comments in the geographical context of the towns and changes have been made as appropriate.
DM EC12	64	The preferred Wigton town centre boundary should be revised to include the auction mart site to the south of the town centre.	We consider the proposed boundary allows sufficient growth within the centre for existing and new businesses, whilst remaining contained enough to ensure the number of vacancies does not significantly increase, and that the critical core of the centre remains vibrant and active. In accordance with national policy, where identified needs for larger scale retail and leisure development cannot be met within the defined boundaries of the town centre, we intend to allocate sufficient land to meet these needs as part of our Site Allocations process.
DM EC12	506	-Is the inclusion of Glasson to justify the presence of the Wave? -Is the exclusion of LIDL from the town centre deliberate? It is hardly an 'out of town' shopping centre -The density of retail etc vs. residential in the section of King Street shown within the proposed defined boundary is not significantly greater than that along Queen Street from Brough Street to Harriston Road. The proposals also include the secondary school – is that a recognised TC use? Your proposals may be tidy but are they consistent? And they exclude the Queen Street Car Park, which together with the Lorry Park has strategic potential to attract a bus/rail interchange (CCC reserve Transport Plan) which in turn could have wider regeneration potential including creating a TC space with depth.	The inclusion of the lower harbour area is justified to allow a greater level of growth within the town, particularly in terms of leisure and tourism uses, which Maryport has been identified as having a significant strategic role; The surveys carried out for Wigton determined that the area in which Lidl is located is considered edge of centre; The proximity of the school is considered contributory to the vitality and viability of the town and was therefore considered appropriate for inclusion; In relation to the Queen Street car park, it is accepted that the car park does provide a valuable facility, however the purpose of the new boundary was to focus town centre developments within a more concentrated area.

TC-Query			
Policy	Consult ID	Comment summary	Response (ours)
DM EC13	3	I do not agree with the primary and secondary boundaries as set out in EC13 and 14 as there is a constant line of shops and businesses across both groups with a total of 4 empty properties available further it does not include the passage with the shops to Wilkinson's, Sainsbury's or the shops on the corner of Mitchells. There is required a proper survey of where the retail businesses are in Cockermouth.	Acknowledge comments. With regards to the primary frontage, it is considered that the preferred policy sufficiently identifies the main areas where the main number of businesses should remain as shops - after further survey however we have made some minor changes.
DM EC13	506	My point above seems to be supported by inference from the absence of any Primary Retail Frontage Map for Aspatria. So if in a highly linear development there is no primary retail frontage, on what basis have the retail and service premises on Queen Street been excluded from the	Given that the town centre boundary is to be newly implemented we did not consider it appropriate to designate primary or secondary frontages which may impose restrictions on the different town centre uses whilst trying to

**TC-Query**

<b>Policy</b>	<b>Consult ID</b>	<b>Comment summary</b>	<b>Response (ours)</b>
		Town Centre? Within this guidance you are proposing to define Aspatria Town Centre but not its Primary Frontages?	establish a critical mass of businesses within. After further review, we consider this remains appropriate.

**TC-Query**

<b>Policy</b>	<b>Consult ID</b>	<b>Comment summary</b>	<b>Response (ours)</b>
DM EC14	3	I do not agree with the primary and secondary boundaries as set out in EC13 and 14 as there is a constant line of shops and businesses across both groups with a total of 4 empty properties available further it does not include the passage with the shops to Wilkinson's, Sainsbury's or the shops on the corner of Mitchells. There is required a proper survey of where the retail businesses are in Cockermouth.	Acknowledge comments. With regards to the Secondary Frontages the omission of the Lowther Went area of the town centre has been accepted for amendment and inclusion within the secondary frontage.