

Environment and Community Services – Parkhouse Building
Kingmoor Business Park | Baron Way | Carlisle | CA6 4SJ

T: 07792659890 – E: michael.barry@cumbria.gov.uk

Mr Garry Legg Planning Investment and Policy Manager
Carlisle City Council
Civic Centre
Carlisle
Cumbria
CA3 8QG

Date 17 June 2015

Dear Garry

Carlisle District Council Local Plan Proposed Submission Draft

Please find attached Cumbria County Council's response to the Carlisle District Council Local Plan Proposed Submission Draft. This was considered by Cumbria County Council at a meeting on 4 June 2015 where it was **RESOLVED**:

(1) The that the strategic response outlined in the report be endorsed and the technical responses contained in Appendices A, B and C be agreed and Local Member feedback contained in Appendix D are submitted to Carlisle City Council to assist ongoing development of the Local Plan.

I hope you find the comments constructive however, should you have any further queries regarding the response please do not hesitate to contact me.

[Redacted signature]

Michael Barry
Senior Planning Officer
Spatial Planning Team

Enc.

Appendix A – Detailed Cumbria County Council Comments with respect to individual policy
Appendix B – Detailed comments on specific development sites
Appendix C – Detailed comments with respect to the Infrastructure delivery Plan
Appendix D – Comments from workshop held with Carlisle Local Committee Members

CABINET

Meeting date: 4 June 2015

**From: Corporate Director – Environment and
Community Services**

REGULATION 19 CONSULTATION ON DRAFT CARLISLE CITY COUNCIL LOCAL PLAN

1.0 EXECUTIVE SUMMARY

- 1.1 *The purpose of this report is to inform Cabinet Members about the consultation on the Carlisle District Council Local Plan Proposed Submission Draft (Regulation 19 Consultation).*
- 1.2 *The development of this Local Plan is at an advanced stage and following this consultation, Carlisle City Council will submit the Local Plan and its supporting evidence base (including an Infrastructure Delivery Plan) to the Secretary of State, who will decide if it can be adopted. When adopted the Local Plan will identify key development sites and the policies to be used to determine planning applications up to 2030.*
- 1.3 *Members are asked to consider the strategic response outlined in this report and agree that the full technical response as set out in Appendices A to C and the Local Member Comments in Appendix D can be submitted to Carlisle City Council.*
- 1.4 *The Council has sought to be actively involved in the development of the Local Plan. This engagement has helped to positively shape its content in line with the matters relevant to the County Council. Therefore, from the Council's perspective, the Plan should be welcomed because it:*
- *broadly meets with the Council's overall vision and priorities;*
 - *gives significant weight to the delivery of necessary infrastructure to support the delivery of the plan and the proposed urban extension to the south of the City;*
 - *promotes a policy approach that should support the sustainable development of the City Centre; and*
 - *will help to deliver housing and employment development within Carlisle to support economic growth;*

1.5 ***Notwithstanding the positive aspects of the Local Plan there is a need for a number of minor amendments to the Local Plan and its supporting evidence base. In particular we would wish to see policy that is more:***

- ***robust in ensuring early development does not prejudice the detailed planning of the Carlisle South urban extension; and***
- ***explicit about the range of infrastructure that planning obligations may be used to secure.***

1.6 ***In addition to this, it is recommended that Carlisle City Council incorporates the latest education information as part of an update to the Infrastructure Delivery Plan (IDP). The City Council should also undertake further testing of the feasibility of a Community Infrastructure Levy as means of supporting delivery of the Local Plan.***

2.0 STRATEGIC PLANNING AND EQUALITY IMPLICATIONS

2.1 ***It is considered that the proposed Local Plan policies broadly reflect the Cumbria Sub Regional Spatial Strategy, the Local Transport Plan, the Area Plan for Carlisle and Cumbria LEP's Strategic Economic Plan. This is important as the Local Plan will set the spatial strategy and key development opportunities within Carlisle until 2030.***

2.2 ***The Local Plan will be the main policy basis for spatial planning in this part of Cumbria. Its implementation will contribute to delivery of the Council's vision "For the people of Cumbria to benefit from sustainable economic growth and an enhanced quality of life"; and the following priorities in the Council Plan (2014-2017):***

- ***To safeguard children, and ensure that Cumbria is a great place to be a child and grow up***
- ***To enable communities to live safely and shape services locally***
- ***To promote health and wellbeing, and tackle poverty***
- ***To protect and enhance Cumbria's world class environment***
- ***To provide safe and well maintained roads and an effective transport network***
- ***To promote sustainable economic growth, and create jobs***
- ***To support older and vulnerable people to live independent and healthy lives***
- ***To be a modern and efficient council***

2.3 ***In relation to equality, Local Plan preparation follows detailed procedures for public engagement that Carlisle City Council must adhere to. Various media are used to advertise opportunities for consultation and documents are available in various formats as there***

are a wide range of consultees involved, crossing all equality strands. It is also important to note that there could be differing views expressed at all levels of engagement throughout the consultation due to the potential impacts on individuals and groups.

3.0 RECOMMENDATION

- 3.1 *It is recommended that Cabinet endorses the strategic response outlined in this report and agrees that the technical responses contained in Appendices A, B and C and Local Member feedback contained in Appendix D are submitted to Carlisle City Council to assist the ongoing development of the Local Plan*

ADVICE OF CORPORATE DIRECTOR – ENVIRONMENT AND COMMUNITY SERVICES

4.0 BACKGROUND

- 4.1 The planning system in England is 'plan led', whereby it is a statutory duty for all Local Planning Authorities to prepare a land-use 'Development Plan' for their area. Carlisle City Council is currently preparing a new Development Plan (called the Local Plan) that, when complete, will replace the current Carlisle Local Plan (September 2008). The new Local Plan will identify key development sites and the policies to be used to decide planning applications up to 2030.
- 4.2 The Government requires that Carlisle City Council works with the Council during the development of the Local Plan as part of the legal "Duty to Co-operate". Close co-operation is essential for both authorities and should ensure that the Council's interests as a planning authority and infrastructure and service provider are appropriately taken into account.
- 4.3 In keeping with this principle the Council has responded to the development of the proposed Local Plan on the following basis:
- Issues Paper (March 2011) – Informal officer comments;
 - Issues and Options (November 2011) – Informal officer comments;
 - Preferred Options Stage 1 (July 2013) – Cabinet endorsed response submitted in October 2013
 - Preferred Options Stage 2 (February 2014) – Cabinet endorsed response submitted in May 2014
- 4.4 Following the current consultation Carlisle City Council will consider whether they wish to make further modifications to the Local Plan before it is submitted to the Planning Inspectorate. It is their independent Planning Inspector that will determine whether the Local Plan is legally compliant and sound in planning terms having regard to national planning policy tests.

Subject to the successful completion of this process, the City Council would be able to adopt the Local Plan.

- 4.5 The proposed Council response to this consultation is detailed in Appendices A to C. Various departments have contributed to the development of the response, which has also been informed by guidance and policy such as the Cumbria Sub Regional Spatial Strategy, the Cumbria Local Transport Plan, Cumbria LEP's Strategic Economic Plan, the draft Cumbria Minerals and Waste Local Plan, the Area Plan for Carlisle and the Council's Planning Obligations Policy.

Strategic Overview of Issues

- 4.6 The County Council's engagement on the Local Plan has facilitated its evolution to a stage that the proposed policy approach is considered to promote a sustainable vision and development strategy for Carlisle District. This does not mean there is not room for improvement and within this response a number of relatively minor but necessary policy revisions are proposed. These are explored in the summary of the key issues below.

Distribution of Development

- 4.7 The Cumbria Sub-Regional Spatial Strategy highlights the importance of sufficient levels of development being delivered to meet identified requirements for homes and employment. It requires that these be concentrated in sustainable locations where people can access services and jobs with ease, and with less reliance on the private car. These principles also help to maximise the delivery of important Council services to local residents.
- 4.8 Consistent with this hierarchal approach, the Sub-Regional Spatial Strategy highlights the requirement for "Major" levels of development in Carlisle followed by "Moderate" scales of development in Longtown and Brampton. To help sustain services and meet needs, including the needs of local businesses and for housing it also recognises the need for "Small Scale" development to take place in other smaller settlements.
- 4.9 In recognition of its size and importance, the Local Plan proposes delivering 70% of growth in Carlisle with the remaining 30% dispersed across the rural area which includes Brampton, Longtown and Dalston.
- 4.10 To achieve the growth required, the Local Plan identifies housing sites in Carlisle and the larger towns and villages. In addition to this allocated land, the Local Plan gives flexibility for development proposals to come forward on unallocated land within or adjacent to both Carlisle and the smaller rural settlements.
- 4.11 We had previously raised concerns that an overly flexible approach to delivery could create uncertainty about where development may emerge, and how the infrastructure implications of this can be accounted for. In response to this concern, policy now provides better safeguards, with strengthened links to the strategic approach of the plan. These will minimise

the risk of inappropriate levels of development occurring upon unallocated sites and in rural areas, and would be in line with national planning policy.

Carlisle South Urban Extension

- 4.12 Within the Local Plan it is proposed that the focus for growth following the year 2025 will be at a “broad location” to the south of the City. Although not fully defined, this proposal would be significant in scale, allowing for growth in homes and jobs in Carlisle. The delivery of such large scale development would be dependent on major infrastructure improvements, which may include new road linkages between Junction 42 of the M6 and the A689/A595 to the west of the City.
- 4.13 To manage this process, the Council had previously encouraged a bespoke policy committing to the preparation of separate Local Plan document to guide the development of this area. This principle is now clearly expressed within the Local Plan and will ensure that the future planning of this area will be underpinned by robust infrastructure evidence and detailed consideration through a Local Plan Examination.
- 4.14 Work on developing the evidence needed to underpin this development is now ongoing and utilising a funding award from the Homes and Communities Agency (£250,000), the Council is considering options for the delivery of new road infrastructure to support growth. The development of such evidence will need to be continuous leading to a position where growth in South Carlisle is underpinned by both a comprehensive infrastructure plan and a clear delivery strategy.
- 4.15 The development of this evidence will take time and it will be critical that unplanned development that prejudices the proper land use and infrastructure planning of this location is resisted. While the Local Plan does seek to prevent such piecemeal growth, the policy could nonetheless be enhanced.

Carlisle City Centre

- 4.16 The Cumbria LEP’s Strategic Economic Plan recognises Carlisle City Centre as a key element of Cumbria’s offer to visitors, residents and investors alike. This importance is understood by the City Council and to help inform planning policy for this area, a City Centre Development Framework has been prepared.
- 4.17 In August 2014 a draft of the City Centre Development Framework underwent consultation. The Council response to this consultation raised concerns that development was being disproportionately focused at Rickergate/North Lowther Street. It also highlighted the need for greater recognition to be given to the importance of investment and development around Carlisle Citadel Station, where it would help maintain the vitality and viability of the southern extent of the City Centre and Botchergate.
- 4.18 Recognising this position, Local Plan Policy now gives considerable emphasis to the value of development in the area surrounding the Citadel and Carlisle Citadel Station. Although land to the north of Lowther Street

and around Rickergate is still identified as a location for future retail development, policy requires that it would only come forward in response to up to date retail evidence and in a manner that effectively integrates with the existing primary shopping area. This policy approach should ensure the balanced and sustainable growth of the City Centre can be achieved.

Housing Growth

- 4.19 The delivery of sufficient housing in sustainable locations can help support both the economic development of Carlisle and the accessibility and viability of its services. Moreover, the Council's statutory responsibilities for adult social care and children's services gives it a direct housing role in the provision of specialist housing and domiciliary care that must be recognised within planning policy.
- 4.20 The City Council is proposing to increase the annual housing requirement from the 450 dwellings set out in the current Local Plan to an average of 565 dwellings. While this quantum represents an uplift on current requirements, it is below the 665 homes per year proposed by Carlisle City Council in an earlier version of the draft Local Plan (Preferred Option 2 – March 2014). When responding to that earlier consultation Cumbria County Council questioned the compatibility of such a housing requirement with up to date evidence, and therefore its deliverability. While the level of growth now proposed still represents an uplift from the existing requirement (450 dwellings), it aligns with up to date demographic, migration and economic evidence and should give sufficient flexibility for the market to deliver the mix of housing needed to support the sustainable growth of Carlisle.
- 4.21 To deliver this growth, concentrations of new housing sites are proposed at Morton, Carleton/Harraby and along Scotland Road, while from 2025 housing delivery would be focused on the strategic development site in Carlisle South. In addition, housing development sites are proposed at; Brampton, Longtown, Burgh by Sands, Cummersdale, Cumwhinton, Houghton, Harker, Moorhouse, Linstock, Rickerby, Scotby, Warwick Bridge, Corby Hill, Wetheral and Wreay (Appendix B provides additional comment on the site assessments contained within evidence supporting the Local Plan).
- 4.22 During previous consultations, the Council has been clear that weight must be given to the delivery of specialised or adaptable housing that can meet the changing requirements of residents over their lifetime (e.g. Extra Care Housing). This principle is now reflected within the Local Plan.

Employment Proposals

- 4.23 Economic growth in Cumbria is a key priority for the County Council. The Cumbria Economic Ambition and LEP's Strategic Economic Plan highlight key priority sectors for economic growth. Of particular relevance to the Carlisle area is the potential for business investment along the M6 corridor, linked to the logistics sector. The other economic sectors reflect the County's strengths in energy and nuclear, advanced manufacturing and the visitor economy.

- 4.24 The City Council has looked to have regard to these priorities when considering the location of new employment sites, with the Local Plan allocating sites to enable delivery of 45 ha of new employment land at Brunthill and Morton. Both sites are well related to the strategic road network and existing employment areas (including Durranshill and Rosehill) which they should complement together with proposals for commercialisation of part of the MOD Longtown site and the development that is underway at Carlisle Airport.
- 4.25 It is also proposed that during the planning of the Carlisle South urban extension, detailed consideration be given to the need for an additional employment site. The County Council has previously advised that such a site will have an important role in ensuring there is a spatial balance between homes and jobs in the City. This means that there will be a continuing need for the Council to support the development of such a proposal through the future planning of this area.

Infrastructure Delivery

- 4.26 The growth proposed within the Local Plan will have inevitable infrastructure consequences. The Local Plan and its evidence base, including the Infrastructure Delivery Plan, must be able to identify the infrastructure requirements and present a credible strategy for enabling delivery of the necessary infrastructure.
- 4.27 Cumbria County Council and Carlisle City Council have enjoyed a positive working relationship with respect to infrastructure planning matters borne out within the recently signed Statement of Intent. Through this both Councils have committed to work together to identify, prioritise and deliver infrastructure. Delivery of infrastructure will be a key challenge and effective working relationships during the determination of planning applications and the negotiation over developer contributions will be essential.

Infrastructure – Highways and Transport

- 4.28 There are three major elements to the assessment of the highways aspects of the Local Plan. These relate to; the effectiveness of specific policy; the suitability of individual development sites; and the cumulative effects of growth.
- 4.29 The Council and City Council have worked closely to develop the highways and transport aspects of the Local Plan. This has helped to ensure the policy of the Plan and the development sites within it are appropriate in highways and transport terms. The cumulative effects of development has also been considered through a jointly prepared Transport Improvements Study (February 2015) which identified specific mitigation measures and junction improvements and the costs associated with these improvements. This study is now part of the Local Plan evidence base and its outputs are summarised within the Infrastructure Delivery Plan.

Infrastructure – Education

- 4.30 Through the Infrastructure Delivery Plan it will be essential to consider the effects of development on schools. We are aware that there are limited places in a number of schools in Carlisle and these would not have the space to accommodate the effects of further housing growth.
- 4.31 Where more school places are required to address the effects of development, it will be expected that developer contributions would be used to fund delivery.

Infrastructure – Delivery Mechanisms

- 4.32 The Council has been consistent in the message that there must be sufficient infrastructure available to meet the needs of development. The Local Plan supports this position and makes it clear that where additional infrastructure is required to address the effects of development; this should be funded by developer contributions.
- 4.33 Such developer contributions can be secured by a number of means. Planning obligations or Section 106 agreements are used to fund improvements needed to address the direct effects of a development, Section 278 agreements are used for improvements on the highway which are delivered by the developer, and Community Infrastructure Levy (CIL) is tariff on new development that, where introduced, can be used to fund infrastructure.
- 4.34 While the approach of the Local Plan with respect to planning obligations is strong, it should still be more explicit about the range of planning obligations that may be used to fund infrastructure. The Council has previously provided this view to the City Council and reiterate it again within this response.
- 4.35 Within the Local Plan and its supporting Infrastructure Delivery Plan, Carlisle City Council has indicated that they will continue to consider the future role of CIL. Infrastructure assessments have displayed a requirement for strategic education and highway infrastructure and aspects of these may be most effectively delivered through CIL. Recognising this, it is considered that Carlisle City Council should commence detailed feasibility work on the scope and viability of CIL.

Natural and Historic Environment and Flooding

- 4.36 With respect to the natural and historic environment and issues are around the management of surface water, a number of minor amendments are proposed to the Local Plan's policies. Furthermore site specific advice on these matters is contained in Appendices A and B to this report.

Council Property Assets

- 4.37 With respect to Council owned land, this response supports the allocation of land in the following locations:
- Part of the Lochinvar School Site in Longtown (Site R4) is proposed for housing development (106 units). It is anticipated this site can deliver housing within the first 5 years of the plan period.

- Upon its closure Pennine Way Primary School site (Site U3) is proposed for housing development (112 units). It is anticipated this site can deliver housing within the first 5 years of the plan period.
- Morton Park Primary School site (Site U9) is proposed for housing development (54 units). It is anticipated this site can deliver housing within the first 5 years of the plan period.
- The Council site at The Courts / Citadel in Carlisle City Centre has been identified as a Key City Centre Redevelopment Opportunity. It is anticipated that this site will be redeveloped within the first 5 years of the plan period.

4.38 The Council had proposed the residential use of land it owns at Cummersdale Road, Cummersdale. Within the Local Plan, this proposal was not supported due to a perception that it is outside of the village. While not supported at this time it is considered that this site may have a longer term role in meeting the housing requirements of Cummersdale.

Local Member Feedback

4.39 On 21 May 2015 County Council members for Carlisle were invited to attend a workshop at which the Local Plan and the proposed County Council response were discussed. A note of the comments provided at this meeting has been provided in Appendix D to this report.

4.40 Key feedback from local members included:

- Recognition on the importance of the infrastructure needed to accommodate growth being delivered and the need for a CIL to support this.
- The importance of good designs that provide good quality open space and respect the character of the local area.
- The need to ensure the impacts of development can be accommodated within road networks.

4.41 Officers consider that the feedback received at the workshop have addressed within the proposed County Council response.

5.0 OPTIONS

There are three options:

5.1 Option 1: The strategic response outlined in this Report is agreed and this together with the technical response contained in Appendix A, Appendix B, Appendix C, and Local Member feedback contained in Appendix D are forwarded to Carlisle City Council to assist the ongoing development of their Local Plan. The response would also establish a framework for continued

close working with Carlisle City Council to prepare the Infrastructure Delivery Plan.

- 5.2 Option 2: Cabinet adds further comments to the strategic response outlined in this Report and agree that this and the technical response contained in Appendix A, Appendix B, Appendix C and Local Member feedback contained in Appendix D are forwarded to Carlisle City Council to assist the ongoing development of their Local Plan. The response would also establish a framework for continued close working with Carlisle City Council to prepare the Infrastructure Delivery Plan.
- 5.3 Option 3: Do not respond. However, this would undermine any opportunities to influence the drafting of the Local Plan, and would put at risk the Council's infrastructure interests and responsibilities.

6.0 RESOURCE AND VALUE FOR MONEY IMPLICATIONS

- 6.1 There are no direct resource or value for money implications arising from the recommendation contained within this report. However, some of the sites identified within the plan are owned by the Authority.
- 6.2 The potential transport and infrastructure implications arising from the developments contained within the report will be subsequently set out within the supporting Infrastructure Delivery Plan. Further work should be progressed to identify the infrastructure requirements necessary to support the delivery of the Local Plan together with a strategy for enabling delivery, including the potential role of CIL.
- 6.3 The Local Plan makes it clear that sufficient infrastructure should be in place to address the effects of development and this should be funded by the developer. These may be in the form of Section 106 or 278 agreements. If developer funding is not available to support the cost of any new or improved infrastructure required by the development then the Council may not be able to provide it.

LEGAL IMPLICATIONS

- 6.4 The Council is a statutory consultee and is not a "decision taker" as such in the Local Plan process. Its views or comments in this process would not appear to hold any direct legal implications for the Council as long as the views or comments have demonstrably been reasoned through as cogent land use considerations, are not arrived at on an unreasonable basis and have been properly considered.
- 6.5 Paragraphs 214 and 215 of the National Planning Policy Framework 2012 provide that, in broad terms, local planning authorities had until March 2013 to ensure that they have up-to-date Local Plans. Local Plans adopted prior to 2004 are only afforded limited weight in planning decisions after this date.
- 6.6 Section 110 of the Localism Act 2011 (inserting a new section 33A in the Planning and Compulsory Purchase Act 2004) places a duty on local authorities to cooperate when preparing development plan documents and/or other local development documents (or activities that can reasonably

be considered to prepare the way for these or that support these documents).

- 6.7 Part 3 of the Constitution provides that one of Cabinet's main responsibilities is to agree responses to consultation papers where appropriate.

7.0 CONCLUSION

- 7.1 The development of this plan is at an advanced stage and following this consultation, Carlisle City Council will submit the Local Plan and its supporting evidence base to the Planning Inspectorate. It is the City Council who following an Examination in Public will decide if it can be adopted, and is sound. When adopted the Local Plan will identify key development sites and the policies to be used to determine planning applications up to 2030.
- 7.2 The Council has sought to be actively involved in the development of the Local Plan. This engagement has helped the Council to positively shape its content in line with the matters relevant to it. It is also important to recognise that both authorities have now signed a Statement of Intent, in which they commit to work together to identify, prioritise and deliver necessary infrastructure.
- 7.3 There are nevertheless, a number of amendments to the Local Plan and its supporting evidence base. In particular policy should be more robust in ensuring early development does not prejudice the detailed planning of the Carlisle South urban extension and be more specific about the range of infrastructure required to address the effects of development.
- 7.4 It is also recommended that building on the effective working relationship with Carlisle City Council, further detailed work is progressed to identify the necessary infrastructure requirements to support delivery of the Local Plan together with a strategy for enabling delivery, which should include CIL.

Dominic Donnini
Director for Environment and Community Services

4 June 2015

APPENDICES

Appendix A – Detailed Cumbria County Council Comments with respect to individual policy

Appendix B – Detailed comments on specific development sites

Appendix C – Detailed comments with respect to the Infrastructure delivery Plan

Appendix D – Comments from workshop held with Carlisle Local Committee Members

Electoral Division(s): All in Carlisle

** Please remove whichever option is not applicable*

Executive Decision	<table><tr><td>Yes*</td><td></td></tr></table>	Yes*		
Yes*				
Key Decision	<table><tr><td></td><td>No*</td></tr></table>		No*	
	No*			
If a Key Decision, is the proposal published in the current Forward Plan?	<table><tr><td></td><td></td><td>N/A*</td></tr></table>			N/A*
		N/A*		
Is the decision exempt from call-in on grounds of urgency?	<table><tr><td></td><td>No*</td></tr></table>		No*	
	No*			
If exempt from call-in, has the agreement of the Chair of the relevant Overview and Scrutiny Committee been sought or obtained?	<table><tr><td></td><td></td><td>N/A*</td></tr></table>			N/A*
		N/A*		
Has this matter been considered by Overview and Scrutiny? If so, give details below.	<table><tr><td></td><td>No*</td></tr></table>		No*	
	No*			
Has an environmental or sustainability impact assessment been undertaken?	<table><tr><td></td><td>No</td><td></td></tr></table>		No	
	No			
Has an equality impact assessment been undertaken?	<table><tr><td></td><td>No</td><td></td></tr></table>		No	
	No			

PREVIOUS RELEVANT COUNCIL OR EXECUTIVE DECISIONS

Cabinet considered the County Council Response to the Local Plan Preferred Options in October 2013.

Cabinet considered the County Council Response to the Local Plan Preferred Options in May 2014.

This report was discussed at a workshop with Carlisle Local Committee members on 21 May 2015

CONSIDERATION BY OVERVIEW AND SCRUTINY

Not considered by Overview and Scrutiny

BACKGROUND PAPERS

The Carlisle District Local Plan Proposed Submission Draft – February 2015

RESPONSIBLE CABINET MEMBER

John McCreesh, Cabinet Member for Environment

REPORT AUTHOR

Michael Barry – Senior Planning Officer
07733302913
michael.barry@cumbria.gov.uk

This page is intentionally left blank

Appendix A - Detailed Cumbria County Council Comments with respect to individual policy

Policy SP2 – Spatial Strategy

1. Carlisle contains a diverse mix of urban and rural areas and with them a range of bespoke issues and challenges which the Local Plan should address.
2. County Council's Area Plan for Carlisle plays an important role in identifying some of our priorities for Carlisle. In particular it gives focus to:
 - Economic growth and employment opportunities and related infrastructure;
 - Health and well-being helping people to live healthier lives
 - Access to services and the development of integrated transport systems;
 - Strong communities where people can access the services they need, including the needs of the elderly.
3. More strategically, the Cumbria Sub-Regional Spatial Strategy highlights how Carlisle is a focal point for development and enjoys a regional role as a business, commerce, shopping, leisure, culture and tourism centre. It recognises that this role can be strengthened and it offers encouragement for significant new housing development and associated social infrastructure.
4. The Sub-Regional Spatial Strategy also highlights the value of the University, the redevelopment of the Airport, public realm improvements to the City Centre and new infrastructure. In addition to this the Council's Area Plan, identifies the potential value of a new road across south Carlisle to support the growth of the City.
5. We consider it important for these principles to be recognised throughout the Local Plan and its spatial strategy.

Role of Settlements

6. The Cumbria Sub Regional Spatial Strategy and the County Council's Area Plan for Carlisle, make clear the importance of development being delivered to meet identified requirements for homes and employment. It requires that these be based in sustainable locations where there is sufficient local infrastructure and services to allow people to access schools, services and jobs with less reliance on the private car. These principles also help to maximise the delivery of important Cumbria County Council services where most people reside. To guide this process, the Cumbria Sub Regional Spatial Strategy identifies a

settlement hierarchy across which development in Cumbria should be distributed.

7. In Carlisle, the Sub-Regional Spatial Strategy highlights the need for major levels of development in Carlisle. It identifies the need for 'Moderate' levels of growth in the other Key Service Centres of Longtown and Brampton. In addition, it highlights the need for 'small scale' development to take place in other rural locations to help sustain services and meet needs, including the needs of local businesses and for housing.
8. To achieve the growth required, the Local Plan allocates housing development sites in Carlisle and the larger towns and villages and highlights the longer term role of the urban extension proposed for Carlisle South. In addition to this allocated land, the Local Plan gives flexibility for development proposals to come forward on unallocated land (known as windfalls) within or adjacent to both Carlisle and the smaller rural settlements.
9. The Council had previously raised concerns that an overly flexible approach to delivery could create uncertainty about where development may emerge, and how the infrastructure implications of this can be accounted for. In response to this concern policy now provides better safeguards, with strengthened links to the strategic approach of the plan. These will minimise the risk of inappropriate levels of development occurring upon unallocated sites and in rural areas, and this is considered to be in line with national planning policy.

Housing Target

10. The delivery of sufficient housing in sustainable locations is important to the County Council. Delivering an attractive range of housing to meet the needs of workers and employers has an important role in supporting economic development. Moreover, the County Council's statutory responsibilities for adult social care and children's services gives it a direct housing role in the provision of specialist housing and domiciliary care that must be recognised within planning policy.
11. We note that the Local Plan is proposing to increase the annual housing requirement from the 450 dwellings set out in the current Local Plan to an average of 565 dwellings. While this quantum represents an uplift on current requirements, it is below the 665 homes per year proposed by Carlisle City Council in an earlier version of the draft Local Plan (Preferred Option 2 – March 2014).
12. When responding to that earlier consultation Cumbria County Council questioned the compatibility of such a housing requirement with up to date evidence, and therefore its deliverability. While the level of growth proposed still represents an uplift from the existing requirement (450 dwellings), it better aligns with up to date demographic, migration and

economic evidence and would still give sufficient flexibility for the market to enable an appropriate fit for Carlisle.

13. This stepped increase in the housing requirement will require careful management, not least to ensure the infrastructure impacts of development are fully considered.

Commercial and Employment Requirement

14. Economic growth in Cumbria is a key priority for the County Council. The Cumbria Economic Ambition and LEP's Strategic Economic Plan highlight key priority sectors for economic growth. Of particular relevance to the Carlisle area is the potential for business investment and growth along the M6 corridor linked to the logistics sector. The other economic sectors relate to the County's strengths in energy and nuclear, advanced manufacturing and the visitor economy.
15. The Council supports the allocation of 45 ha of new employment land and the role of and recognition being given to opportunities at MOD Longtown site and the development that is underway at Carlisle Airport.

Retail Requirement

16. This policy points to a need for a further 18,700 sq. m. of modern comparison retail floorspace up to 2030. The need for this level of floorspace aligns with the needs identified in the 2012 Carlisle Retail Study. The Council had previously advised that this study should be subject to a review and refresh to ensure its outputs reflect the current economic situation in Carlisle and the latest growth projections.
17. The City Council has advised that the Local Plan evidence base was developed to endure across the plan cycle and would be reviewed in due course. It is also understood that soft marketing testing undertaken in conjunction with the development of the Local Plan points to there being no significant change to the conclusions reached by the study. On balance we are satisfied that this advice addresses our concern but will nonetheless expect this situation to be kept under ongoing review.

Other Issues

18. Housing, Employment, the City Centre, Carlisle South and the rural economy are discussed in detail when responding to specific policies.

Policy SP3 – Broad Location for growth: Carlisle South

19. Within the Local Plan it is proposed that the focus for growth following 2025 will be in a "broad location" to the south of the City. Although not fully defined, this proposal would be significant in scale, allowing for growth in homes and jobs in Carlisle. Such growth would require major new infrastructure, which may include a link between Junction 42 of the M6 and the A689/A595 to the west of the City.

20. To manage this process, the County Council had previously advocated a bespoke policy that would commit to the preparation of a separate Local Plan document to guide the development of this area and resist piecemeal, unplanned developments. The principle of comprehensive planning for this area is now recognised within the Local Plan and this should ensure that the future planning of this area will be underpinned by robust infrastructure evidence.
21. Work on developing the evidence needed to underpin this development is now ongoing and utilising a funding award from the Homes and Communities Agency (£250,000), the County Council is working with Carlisle City Council to consider options for the delivery of new road infrastructure to support growth. The development of such evidence will need to be continuous leading to a position where growth in South Carlisle is underpinned by both a comprehensive infrastructure plan and a clear delivery strategy.
22. The development of this evidence will take time and it will be critical that unplanned development that prejudices the proper land use and infrastructure planning of this area is resisted. While, as stated above, the Local Plan does seek to prevent such piecemeal growth, it is felt that the policy could nonetheless be strengthened.

Suggested Changes

23. In the third paragraph:
 - After the word piecemeal add the word “***or unplanned***”.
 - Before the word infrastructure delete the words “large scale”.

Policy SP4 – Carlisle City Centre and Caldew Riverside

24. The Cumbria LEP’s Strategic Economic Plan recognises Carlisle City Centre as a key element of Cumbria’s offer to visitors, residents and investors alike. This importance is recognised in the Local Plan and supporting City Centre Development Framework.
25. In August 2014 a draft of the City Centre Development Framework underwent consultation. The County Council’s (September 2014) response to this consultation sought to support the identification of development sites that will ensure the ongoing sustainability of the City Centre. It did raise concerns that development was being disproportionally focused at Rickergate/North Lowther Street and considered that there needed to be greater recognition to the importance of investment and development around Carlisle Station where it would help maintain the vitality and viability of the southern extent of the City Centre and Botchergate.

26. That view reflects the County Council's position that the nature, timing and location of growth in should meet the needs of the market; but also complement the broader vitality of retail locations across the City Centre.
27. The approach now proposed in Policy SP4 better aligns with this position, giving considerable emphasis to the value of development in area surrounding the Citadel and Carlisle Station, and establishing a requirement for development to the North of Lowther St. / Rickergate to integrate with the existing Primary Shopping Area and meet identified needs.
28. While these policy additions are welcome, it is suggested that there be an additional requirement that proposals to the North of Lowther St. / Rickergate be accompanied by an "impact assessment". This would assess the impact of proposals on town centre vitality and viability should help to ensure that proposals should serve to complement the operation and vitality of the City Centre.
29. With respect to the paragraphs supporting the policy, the text in paragraph 3.50 appears to downplay opportunities around the Citadel. This paragraph is considered to be unnecessary and it should therefore be removed.

Suggested changes

30. Delete paragraph 3.50.
31. In the eighth paragraph of Policy SP4 add after "*in response to retail needs*", "***are accompanied by an impact assessment***".

Policy SP5 – Strategic Connectivity

32. The principles expressed within this policy are supported.

Policy SP6 – Securing Good Design

33. The Council welcomes the inclusion of previous advice relating to disability access, highway materials and ecology.

Policy SP7 – Valuing our Heritage and Cultural Identity

34. This policy is supported.

Policy SP8 – Blue and Green Infrastructure

35. This policy is supported.

Policy SP9 – Healthy Communities

36. While the Council welcomes encouragement for the development of decent homes that are adaptable for the life course of the occupiers, this policy could go further and rather than “encourage”, there should be an expectation that all homes respect this principle.
37. Such a change would better reflect the content of Paragraph 50 of the NPPF and the PPG and its emphasis on delivering housing that can meet the through life requirements of occupiers. This principle is highlighted within the County Council Planning Obligations Policy which seeks to amplify the importance of good design in helping people to remain in their homes as their needs change.

Suggested Change

38. Under criteria 4, delete the word “*Encourage*”.

Policy SP10 – Supporting Skilled Communities

39. The Sub-Regional Spatial Strategy, LEP Strategic Economic Plan and the County Council’s Area Plan for Carlisle all support the important role of the University of Cumbria.
40. The policy is supported as it will allow for the future development of Further Education and Higher Education within the City.

Policy EC1 – Employment Land Allocations

41. Economic growth in Cumbria is a key priority for the County Council as reflected in the Cumbria Economic Ambition, LEP’s Strategic Economic Plan and the Council’s Area Plan for Carlisle.
42. The Council is satisfied that the Local Plan is supporting opportunities for economic growth in allocating land for employment at Brunthill and Morton. Both sites are well related to the strategic road network and existing employment areas (including Durranhill and Rosehill), which they should complement. These will also contribute to a wider range of employment opportunities in Carlisle, including the commercialisation of part of the MOD Longtown site and the development that is underway at Carlisle Airport.
43. Reflecting the longer term growth of the City, it is also proposed that as part of planning for the Carlisle South urban extension, detailed consideration will be given to the need for additional employment land. The Council has previously advised that the identification of additional employment land will have an important role in ensuring there is a spatial balance between homes and jobs in the City and would wish to see this principle reflected in the future planning for south Carlisle.

Policy EC2 – Primary Employment Areas

44. This policy approach is supported.

Policy EC3 – Primary Shopping Areas and Frontage

45. This policy approach is supported.

Policy EC4 – Morton District Centre

46. It is noted that retailing at the Morton District Centre already benefits from planning permission and is supported by an allocation within the current adopted Local Plan. On this basis the provision of retail development here is considered appropriate.

Policy EC5 – District and Local Centres

47. This policy approach is supported.

Policy EC6 – Retail Proposals outside the Primary Retail Area

48. This policy deals with retail proposals outside of the designated Primary Retail Areas. It requires that schemes which are not on allocated sites should be subject to sequential consideration and meet a number of standard planning considerations.
49. This policy is considered important and the additional reference to sequential and impact testing is supported as per the County Council's Preferred Options response.

Policy EC9 – Arts, Culture, Tourism and Leisure Development

50. This policy contains the criteria against which new proposals for Arts, Culture, Tourism and Leisure Development would be considered.
51. This policy is considered important and the additional reference to sequential and impact testing is supported as per the County Council's Preferred Options response.

Policy EC10 – Rural Diversification

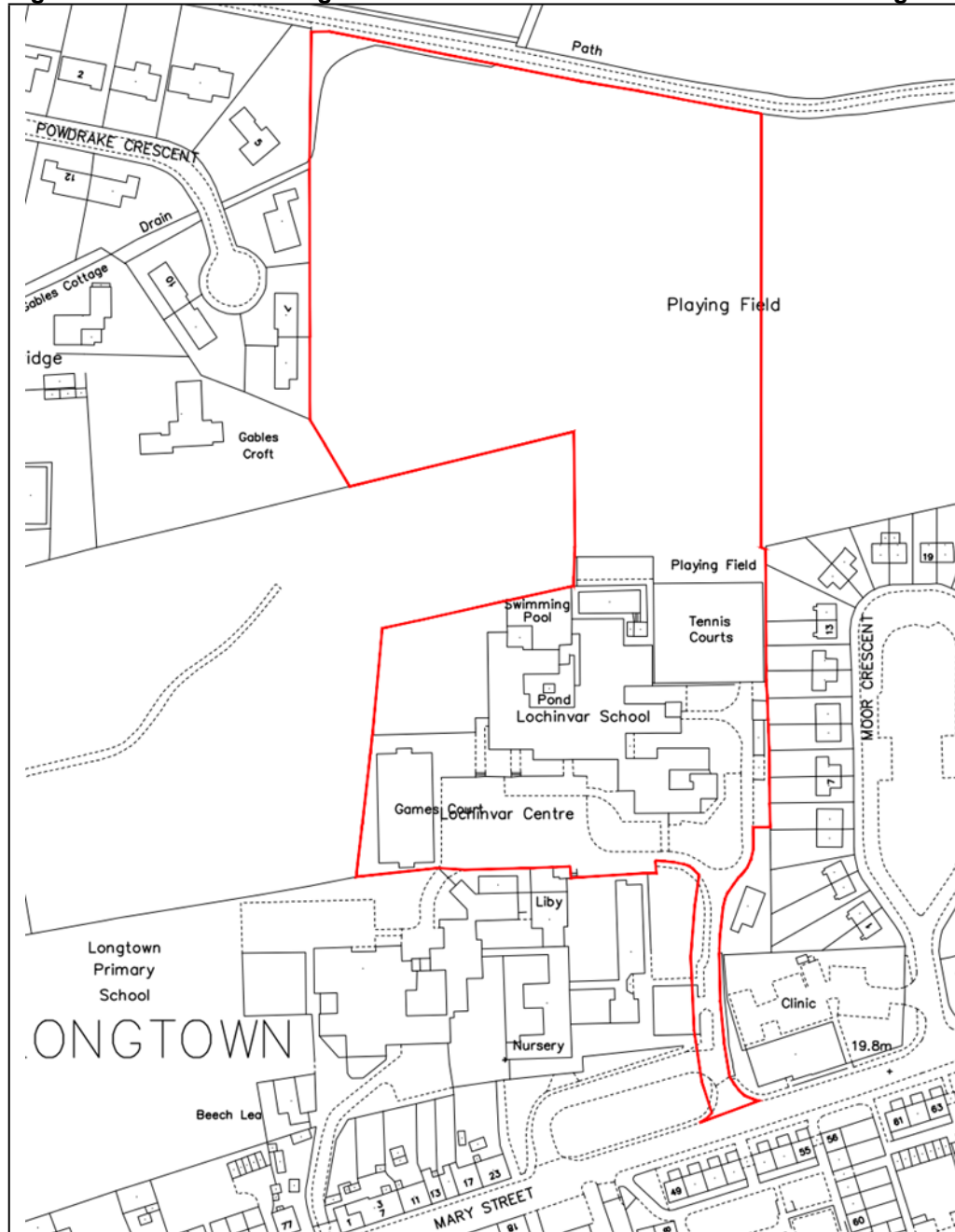
52. The draft Local Plan sets out policy with respect to the consideration of economic development proposals in rural communities. This policy reflects our earlier advice about the importance of there being adequate access arrangements for sites and the need for flexibility about the forms of development appropriate in rural locations. It is therefore supported.

Policy HO1 – Housing Strategy and Delivery

53. The delivery of sufficient housing in sustainable locations is important to the County Council. Delivering a range of high quality housing to meet the needs of workers and employers has an important role in supporting economic development. Moreover, the County Council's statutory responsibilities for adult social care and children's services give it a role in the provision of specialist housing and domiciliary care that must be recognised within planning policy.
54. The proposed increase in the annual housing requirement represents an uplift on the current Local Plan requirement (450 dwellings), it is still below the 665 homes per year proposed by Carlisle City Council in an earlier version of the draft Local Plan (Preferred Option 2 – March 2014). When responding to that earlier consultation Cumbria County Council questioned the compatibility of such a housing requirement with up to date evidence, and therefore its deliverability.
55. While the level of growth proposed still represents an uplift from the existing requirement (450 dwellings), it aligns better up to date demographic, migration and economic evidence set out within the 2014 Carlisle City Council SHMA and the 2014 Cumbria Intelligence Observatory POPGROUP Modelling. It would also give sufficient flexibility for the market to deliver the mix of housing needed to support the sustainable growth of Carlisle.
56. To deliver this growth, concentrations of new housing sites are proposed at Morton, Carleton/Harraby and along Scotland Road, while from 2025 housing delivery would be focused on the strategic development site in Carlisle South. In addition, housing development sites are proposed at; Brampton, Longtown, Burgh by Sands, Cummersdale, Cumwhinton, Houghton, Harker, Moorhouse, Linstock, Rickerby, Scotby, Warwick Bridge, Corby Hill, Wetheral and Wreay (Appendix B provides advice on the Local Plan assessment of housing sites and advice here should be reflected in the statements provided Appendix 1 to the Draft Local Plan). No objections have been raised to the principle of development and the housing sites proposed.
57. Within Policy HO1 indicative phasing has been attributed to individual housing sites. While this approach will aid the establishment of the five year supply of housing land and housing trajectory, it needs to be absolutely clear that this policy would not prohibit the early delivery of allocated land.
58. It is considered important to highlight below points with respect to Cumbria County Council owned land:
 - The proposed allocation of the site of Pennine Way Primary School for housing (ref. U 3) upon its closure is welcomed by the County Council as owner of the site

- The County Council supports the proposed allocation of the County Council land at Lochinvar School, Longtown (ref. R 4). Within the Housing Site Selection Process evidence base document, reference has been made to possible access constraints relating to the sites physical connectivity to the public highway. The Council can confirm it is in control of connecting the site to the highway as set out in the below red-line plan.

Figure 1. Plan showing unconstrained 9.5m wide access to highway



- The proposed allocation of the former Morton Park School site (ref. U9) is sustainably located on previously developed land, and represents an appropriate location for housing development. The proposed allocation of this site is supported.

- The County Council had proposed residential use of land it owns at Cummerdale Road, Cummersdale. Within the Local Plan, this proposal was not supported due to a perception that it outside the village of Cummersdale. While not supported by the City Council currently, it is considered that this site is capable of having a role in meeting the housing requirements of Carlisle District even if this potential would be realised in the longer term.

Suggested Changes

59. Amend allocations map in line with the above plan of the Lochinvar site.
60. Within the supporting justification for the policy there should be an additional paragraph stating:

“Consistent with the ‘presumption in favour of sustainable development’ planning applications for sites with an indicative phasing for the years 5-10 would be supported in principle, even if they are submitted within the first 5 years of the plan period”.

Policy HO2 – Windfall Housing Development

61. As per the comments provided in response to Policy SP2, it is noted that the proposed Local Plan does not contain a detailed “settlement hierarchy”. Instead, while allocating some housing development sites in the larger towns and villages, policy requires that other housing proposals be considered in a flexible way, having regard to the availability of services at a settlement or in other nearby locations, alongside normal considerations around design, amenity and environmental impacts.
62. The Council had previously raised concerns that an overly flexible approach to delivery could create uncertainty about where development may emerge, and how the infrastructure implications of this could be accounted for. The policy now provides closer linkages to the strategic approach of the plan and benefits from a clearer interpretation in its supporting paragraphs. These minimise the risk of inappropriate levels of development occurring upon unallocated sites and in rural areas, and are considered to be in line with national planning policy.

Policy HO4 – Affordable Housing

63. It will be important that the Local Plan can deliver homes to meet differing needs across the District. The City Council’s SHMA has identified an annual affordable housing need for 295 units across Carlisle. A standard method to deliver affordable housing is for the developer to build these as a proportion of open market housing as part of the mix of housing on a development site. This approach to delivering affordable homes is increasingly important given the reducing level of central Government financial support for new affordable housing.

64. To facilitate the delivery of affordable housing, the Local Plan proposes a varied requirement across the district, with the level sought dependant on the viability of development.
65. This nuanced approach is appropriate given the differences in the housing market areas across the district and combined with the proposed uplift in housing numbers, should aid the delivery of necessary affordable homes across Carlisle District.
66. The Council also supports the potential to secure an element of extra care housing as part of the overall affordable housing mix.

Policy HO5 – Rural Exceptions Sites

67. This policy sets out an appropriate framework against which proposals for rural exception sites can be considered and the approach taken is supported. In particular, the allowance for a small proportion of open market housing upon “exceptions sites” in order to provide cross subsidy where it can be shown that viability is a key constraint will assist the delivery of exceptions sites. This approach will be especially important at a time when Government grant support for affordable housing is diminishing.

Policy HO6 – Other Housing in the Open Countryside

68. While giving recognition to the importance of meeting the housing and economic needs of rural communities, both the NPPF and the Cumbria Sub Regional Spatial Strategy are clear that it should be the exception for new housing to be located within open countryside locations.
69. This policy provides a mechanism whereby proposals for new build rural workers accommodation or replacement dwellings are supported.

Policy HO7 – Housing as Enabling Development

70. This policy is important as it serves to establish a mechanism through which important heritage assets can be protected. This is a tool acknowledged within the NPPF, and the policy is considered appropriate.

Policy HO10 – Housing to Meet Specific Needs

71. The NPPF highlights the importance of ensuring that the housing requirements of those with special requirements are met. Specialist housing and house designs that can be adapted to meet residents’ needs over their entire lifetime are important to help maintain the independence of occupiers in their homes.

72. The County Council's Extra Care Strategy gives a conservative estimate of need for 265 extra care units in Carlisle in 2009, rising to 340 by 2019 and quantifies this requirement on the basis set out in the table below.

Figure 1. Extra Care Strategy Requirements

Location	Number of Places
Brampton	55
City of Carlisle	234
Dalston	29
Longtown	21

73. The County Council is working to support the continued delivery of extra care housing in line with requirements and recognises the value of this policy in supporting this process.

Policy HO11 – Traveller and Travelling Showpeople Provision

74. This policy approach has been underpinned by appropriate evidence and is supported.

Policy IP1 – Delivering Infrastructure

75. Infrastructure to support the growth aspirations of a location is essential in ensuring both deliverability of a local plan and the sustainability of the communities it seeks to support. It is therefore imperative that there is a comprehensive Infrastructure Delivery Plan that establishes what infrastructure is required to deliver the sustainable development aspirations of the Carlisle Local Plan.
76. While the current IDP is considered to be fundamentally robust, it will need to be subject to continuing review as new evidence, for example about evolving infrastructure needs or the availability of funding, becomes available.
77. Consistent with this principle the current Infrastructure Delivery Plan has evolved since the previous consultation. Significantly this now incorporates the findings of the Carlisle Transport Improvements Study which identified a range of 11 junction and 21 sustainable transport improvements needed to support the sustainable development of the City.
78. To aid continued refinement, detailed comments and insertions for the latest version of the Infrastructure Delivery Plan has been provided in accompanying Appendix C.
79. The Council is satisfied that some of the necessary strategic education and highway infrastructure may be most effectively delivered through CIL. Recognising this, it is considered that Carlisle City Council should now commence detailed feasibility work on the scope and viability of CIL.

80. It is anticipated that there will be opportunities to develop synergies between Cumbria County Council's developing Area Plan for Carlisle, and the Infrastructure Delivery Plan.

Policy IP2 – Transport and Development

81. The Council welcomes the changes made to this policy following the previous consultation and supports the proposed policy.

Policy IP3 – Parking Provision

82. The Council welcomes the changes made to this policy following the previous consultation and supports the proposed policy.

Policy IP4 – Broadband Access

83. Adequate internet access is important in allowing business to operate effectively and it helps individuals access the services more effectively. This policy, which seeks to ensure that new development can access adequate fibre and ducting, brings value and is considered appropriate.

Policy IP5 – Waste Minimisation and the Recycling of Waste

84. The Council welcomes the changes made to this policy following the previous consultation and supports the proposed policy.

Policy IP7 – Carlisle Airport

85. The Council recognises the strategic role of Carlisle Airport to the local area and wider Cumbrian economy. The proposed policy approach, which supports development that complements and supports the operation of the airport is supported.

Policy IP8 – Planning Obligations

86. In September 2013, Cumbria County Council adopted its Planning Obligations Policy. The policy document details the scope and range of planning obligations that Cumbria County Council as a consultee, working with Cumbria's District and National Park authorities, may seek to secure through the planning process. In doing so it promotes a consistent and transparent approach so that communities and the development industry are able to see and understand how development in their area is making a fair and positive contribution to sustainable communities. Since its adoption it has been in widespread use and has assisted Inspectors during the consideration of appeals. This policy should be referenced within the supporting paragraphs.
87. Planning obligations have an important role in ensuring the suitability and sustainability of new development. Robust Local Plan policy about

Planning Obligations is therefore essential to the creation of an effective Local Plan.

88. The proposed Local Plan policy does not list specific potential areas for S106 agreement, but instead relies upon the Infrastructure Delivery Plan to specify contributions. We are concerned that this approach creates a weakness in the policy which would appear to conflict with planning obligations advice contained in the Government's Planning Practice Guidance which states: "*policies for seeking planning obligations should be set out in a local plan*".
89. The Infrastructure Delivery Plan will relate to strategic infrastructure issues, but localised site specific issues can arise during the consideration of individual applications that require mitigation through Planning Obligation. By reason of their scale (i.e. smaller localised/site specific issues), these may not be identified within the IDP and in any case, the issues identified within the IDP may evolve over time. It is essential for the Local Plan to list as many forms of contribution that may be sought by S106 as possible. Detailed and explicit policy around S106 is crucial in ensuring the needs of our communities are adequately recognised during the consideration of planning proposals.
90. This point can be easily addressed to be consistent with Paragraph 173 of the NPPF, so that planning application negotiations and the viability testing (including the effects of developer contributions) can support deliverability of the Local Plan.

Suggested Change

91. Policy 40 should be revised to state the range of planning obligations that may be used to secure infrastructure.
92. The County Council's Planning Obligations Policy should be referenced within the paragraphs supporting this policy. This paragraph should state:

In September 2013, Cumbria County Council adopted its Planning Obligations Policy. The policy document details the scope and range of planning obligations that Cumbria County Council working as consultee, with Cumbria's District and National Park authorities, may seek to secure through the planning process. In doing so it promotes a consistent and transparent approach so that communities and the development industry are able to see and understand how development in their area is making a fair and positive contribution to sustainable communities. In implementing the Local Plan the City Council will work with the County Council and other infrastructure providers to consider the effects of development and to secure necessary developer contributions.

Policy CC1 – Renewable Energy

93. The proposed policy approach is supported.

Policy CC2 – Energy from Wind

94. This policy highlights a range of considerations that regard should be given to during the consideration of wind energy schemes. The approach proposed allows the careful consideration of the impact of proposals individually and having regard to cumulative effects.
95. While the policy is considered appropriate, there would be merit in the supporting text making reference to the value of the Cumulative Impact of Vertical Infrastructure study work.

Suggested Changes

96. The Cumulative Impact of Vertical Infrastructure work should be referred to in the supporting text of the wind energy policy.

Policy CC4 – Flood Risk and Development

97. While the fundamental aspects of this policy and supporting text are appropriate. Some adjustments should be undertaken to emphasise the importance of surface water drainage and the need to avoid the use of flood plains for storage.

Suggested Changes

98. In Paragraph 1, delete “critical drainage problems” and replace it with; *“Surface water flooding concerns or is listed as an area of concern in the Lead Local Flood Authority local flood risk management strategy”*.
99. In Paragraph 7.29 replace the word “watercourse” with **“river”**.
100. Paragraph 7.30 should be removed in full as flood plain areas are never used for storage.
101. Paragraph 7.32 should say about new developments that ***“developments should be sustainable and use building methods that promote the use of permeable surfacing”***. And after the words *Environment Agency* add ***“Lead Local Flood Authority”***.

Policy CC5 – Surface Water Management and Sustainable Drainage Systems

102. While the fundamental aspects of this policy and supporting text are appropriate, some adjustments should be undertaken to better underline the correct prioritisation of flood management and to reflect the correct terminology.

103. On the 15th April 2015, the County Council became the Lead Local Flood Authority and statutory consultee for all local planning authorities in Cumbria. Consultee status is for all Major scheme designations consisting of 9 houses or more or sites > than 0.5 Ha. This latest position needs to be reflected within the Plan.

Suggested Changes

104. Within the policy, the order of prioritisation of discharge approaches should be changed around, with point 3 moved before point 2.
105. Discharge to sewer is controlled by United Utilities and not planning legislation and therefore the last part of the policy should be revised.
106. The last paragraph talks about greenfield run off but does not use the correct terminology. This needs to be amended to cover 1:30 and 1:100 year returns and run off after development.
107. Paragraph 7.42 needs to be amended to recognise the role of the Lead Local Flood Authority as statutory consultee on major developments.

Policy CM1 – Health Care Provision

108. This policy supports the provision of new health facilities in sustainable locations. It is considered important for health and wellbeing to be properly recognised in the plan. This policy is therefore supported.

Policy CM2 – Educational Needs

109. This policy highlights the importance of schools being well related to the communities they are to serve. This principle is supported, as is the commitment to work with the County Council to consider the effects of new housing development on school infrastructure and to assist with the identification of new sites and school expansions should they be required.
110. New housing development may increase the number of children in a location beyond what some schools, in their present form, will be able to accommodate. The Council therefore welcomes the recognition this policy gives to the role of developer contributions in addressing any shortfalls in order to make the development sustainable.
111. To address the effects of development, we are aware of the need for more primary and secondary school places in different parts of the Carlisle District. For example there are pressures on primary school places to the north of the River Eden in Carlisle. In response to two recent planning applications here (ref. 01/14/0761 and 01/14/0778), the County Council highlighted the need for a new primary school to address the effects of development (funded by developer contributions).

112. Moving forward Cumbria County Council will continue to work closely with Carlisle City Council to quantify the effects of development. Where more school places are required to address the effects of development, it will be expected that developer contributions would be used to fund their delivery.

Policy CM4 – Planning Out Crime

113. Crime and the fear of crime can create significant costs for communities both in terms of physical and mental harm but also financially. This policy, which sets out the principles that developments should adhere to, to minimise the risk of crime is welcomed.

Policy CM5 – Environmental and Amenity Protection

114. This policy seeks to ensure that development is not a risk or creates an environmental (including pollution) or amenity risk. This policy is considered appropriate.

Policy CM 6 – Cemetery Provision

115. This policy sets out the principles to be used to guide the identification of a new cemetery. The principles set out are all important and this policy is therefore considered appropriate.

Policy HE 1 – Hadrian’s Wall World Heritage Site

116. This policy concerns the consideration of development proposals within the World Heritage Site Buffer Zone. This establishes principles to be applied when considering development within this area, and it is considered appropriate.
117. Notwithstanding this, it is suggested that the correct name for the World Heritage be attributed to the site. This is the “Frontiers of the Roman Empire (Hadrian’s Wall) World Heritage Site”.

Suggested Change

118. Revise references to “Hadrian’s Wall World Heritage Site” to “***Frontiers of the Roman Empire (Hadrian’s Wall) World Heritage Site***”.

Policy HE2 – Scheduled Ancient Monuments and Non-Designated Archaeological Remains

119. The Council welcomes the changes that have been made following earlier advice and the policy is therefore supported.

Policy HE7 –Conservation Areas

120. The establishment of a policy that sets out how development in Conservation Areas would be considered is important. The Council welcomes the amendments to the policy in light of the earlier advice and therefore supports the policy.

Policy GI1 – Landscapes

121. The NPPF Core Principles include the need for local planning authorities to take into account the roles and character of different areas, and to recognise the intrinsic beauty of the countryside and the importance of supporting thriving rural communities within it.
122. NPPF Paragraph 109 outlines guidance in regard to conserving and enhancing the natural environment, which includes the need for the planning system to contribute to the protection and enhancement of valued landscapes. It is considered that this policy respects these important considerations.

Policy GI2 – Areas of Outstanding Natural Beauty

123. The policy approach to considering development in the AONB is considered appropriate.

Policy GI3 – Biodiversity and Geodiversity

124. The proposed policy approach is considered appropriate.

Policy GI4 – Public Open Space

125. It is considered important that new housing developments incorporate appropriate areas of public space. Where effectively planned public open space can be important design feature that helps developments effectively integrate with the local area surroundings. By seeks to enshrine the role of public open space as part of development sites this policy is supported.

Policy GI5 – Public Rights of Way

126. The Council supports the proposed policy approach.

Policy GI6 – Trees and Hedgerows

127. This policy gives important advice to be giving weight to during the consideration of proposals which may affect trees and hedgerows. This recognition is welcome and the principle of the proposed policy appears appropriate.

Appendix B – Detailed comments on specific development sites

1. The County Council has contributed significantly to the assessment of specific development sites. While we are satisfied at the appropriateness of the proposed housing sites in principle, we will nonetheless expect that when sites are subject to planning applications they will be subject to a full and detailed assessment in line with the policies of the Local Plan.
2. The below assessment considers the commentary provided with respect to the individual development sites within Housing Site Selection document which forms part of the evidence base supporting the Local Plan. As part of this, our response just considers those elements of the assessments we consider to require amendment. It does not look at nor prejudice the assessments of matters that will require consideration at the point a planning application is submitted. We also request that the advice set out below is reflected within Appendix 1 to the Local Plan.

Carlisle	Comments on Assessment Undertaken
U 1 - Land to the south east of junction 44	Highways Advice The assessment should be revised to state: "<i>the Highways Authority has indicated that the sites would need significant infrastructure works to create access off A7/C1022 signalised junction. Consideration should also be given to the development providing alternative access arrangements to the James Rennie School to ensure sustainability and accessibility of the site.</i>" Lead Local Flood Authority Flood and drainage assessment should be revised as follows: ○ remove the comment on flat site limiting types of SUDS ○ remove the text stating: ' Ideally should drain to the west.....' ○ 4th comment should be revised to state: '<i>The watercourse on site should remain open and road crossings limited to as few as possible</i>'
U 2 - Land north of California Road, east of U 1	Highways Advice The assessment should be revised to state: "<i>the Highways Authority has indicated that the sites would need significant infrastructure works to create access off A7/C1022 signalised junction. Consideration should also be given to the development providing alternative access arrangements to the James Rennie School to ensure sustainability and accessibility of the site.</i>"

	Lead Local Flood Authority Flood and drainage assessment should be revised as follows: ○ remove the comment on flat site limiting types of SUDS ○ remove the text stating: ' Ideally should drain to the west.....' ○ 4th comment should be revised to state: <i>'The watercourse on site should remain open and road crossings limited to as few as possible'</i>
U 3 - Site of Pennine Way Primary School	No further comment
U 4 - Land north of Moorside Drive/Valley Drive	Heritage Assessment The assessment should state: <i>"Bronze Age remains have been revealed adjacent to the site and the wider landscape is rich in prehistoric remains. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
U 5 - Land between Carleton Road and Cumwhinton Road	No further comment
U 6 - Land at Garden Village, west of Wigton Road	Highways Advice The assessment should be revised to state: <i>"the landowner has indicated that the site will be accessed onto the A595 (Wigton Road) and states that the details of this access have been agreed with the Highways Authority. The Highways Authority has confirmed that satisfactory access is available off Wigton Road. The site would require the provision of new bus stops and potentially a developer contribution towards an increased frequency of bus service. The site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use."</i> Lead Local Flood Authority Flood and drainage assessment should be revised as follows: ○ Remove 2nd point ○ Amend 4th point – No historic surface water flooding have been reported for the site
U 7 - Land at Newhouse Farm, south-east of Orton Road	Highways Advice The assessment should be revised to state: <i>"the Highway Authority has indicated that the site would need to be accessed off Orton Road which would need corridor improvements and suburban bus service extension. Cycle path linkage to secondary school is essential."</i>

	Lead Local Flood Authority Flood and drainage assessment should be revised as follows: ○ Amend 4th point – No report of surface water flooding problems on site ○ Amend 6th point – Open watercourses need to be retained except where road crossings are required. Heritage Assessment The heritage assessment should state: <i>"Prehistoric remains have been revealed on an adjacent residential development site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
U 8 - Land north of Burgh Road	Heritage Assessment The heritage assessment should state: <i>"The site has been subject to a geophysical survey which revealed archaeological assets. These will need to be investigated and recorded prior to any development commencing."</i>
U 9 - Site of former Morton Park Primary School, Burnrigg	No further comment
U 10 - Land off Windsor Way	Highways Advice The assessment should be revised to state: <i>"Highways Authority has expressed some concern over traffic generation, and indicated that a loop road would be required so that a bus service can access the site and the adjoining housing area. Capacity issues are likely with M6 junction 44 and onto Scotland Road, as well as major junctions to the north of Carlisle. Tarraby Lane is not of sufficient standard to serve the development. Any further development will need improvements to the resilience of the site (i.e. additional access points)"</i>
U 11 - Land east of Lansdowne Close/Lansdowne Court	Highways Advice The assessment should be revised to state: <i>"Highways Authority has expressed some concern over traffic generation, and indicated that a loop road would be required so that a bus service can access the site and the adjoining housing area. Capacity issues are likely with M6 junction 44 and onto Scotland Road, as well as major junctions to the north of Carlisle. Tarraby Lane is not of sufficient standard to serve the development. Any further development will need improvements to the resilience of the site (i.e. additional access points)"</i>
U 12 - Site to the rear of Border Terrier, Ashness Drive/Ellesmere Way	Lead Local Flood Authority Flood and drainage assessment should have the 3rd comment deleted.

U 13 - Land east of Beverley Rise	No further comment
U 14 - Land north of Carleton Clinic, east of Cumwhinton Drive	Highways Advice: The assessment should be revised to state: <i>"the Highways Authority has advised that Cumwhinton Drive at this point is a private road and would require upgrading to local distributor road standard. The development of the sites should be linked to ensure satisfactory linkage to the A6. The traffic modelling results being carried out by Cumbria County Council to inform the Local Plan should be considered for junction capacities. The development of the site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use"</i> Heritage Assessment: The heritage assessment should state: <i>"A Bronze Age cemetery and other prehistoric remains have been found at the former Garlands Hospital. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
U 15 - Former Dairy site, Holywell Crescent, Botcherby	No further comment
U 16 - Land at Deer Park, Belah, Carlisle	Highways Advice: The assessment should state: <i>"Access should be safe and the development of the site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use."</i> Heritage Assessment: The heritage assessment should state: <i>"An archaeological desk-based assessment has identified that there is the potential for Roman archaeological remains to survive on the site. An archaeological investigation will need to be carried out prior to any development commencing."</i>
U 17 - Land to the south west of Cummersdale Grange Farm	Highways Advice: The assessment should state: <i>"Access should be safe and the development of the site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use."</i>
U 18 - Land Opposite Rosehill Industrial Estate	Highways Advice: The assessment should state: <i>"Access should be safe and the development of the site should ensure good</i>

	<i>non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use. Mitigation measures for traffic impact will be needed not merely to allow the additional motorised traffic , but also pedestrian movements to main attractors (schools, retail, leisure). "</i> Heritage Assessment The heritage assessment should state: <i>"Prehistoric remains survive on the site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
U 19 - Land at Carleton Clinic	Highways Advice: The assessment should be revised to state: <i>"the Highways Authority has advised that Cumwhinton Drive at this point is a private road and would require upgrading to local distributor road standard. The development of the sites should be linked to ensure satisfactory connection to the A6. The traffic modelling results being carried out by Cumbria County Council to inform the Local Plan should be considered for junction capacities. The development of the site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use"</i>
U 20 - Durranhill Road	Highways Advice: The assessment should state: <i>"The site seems to be land locked as no access to the highway network is shown. Access should be safe and the development of the site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use. Mitigation measures for traffic impact will be needed not merely to allow the additional motorised traffic, but also pedestrian movements to main attractors (schools, retail, leisure)."</i> Heritage Assessment The heritage assessment should state: <i>"Prehistoric remains have been revealed on an adjacent residential development site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
U 21 - Laing's site, Dalston Road, Brampton	Lead Local Flood Authority Flood and drainage assessment should have its first comment amended. In particular it should be recognised that The Environment Agency's surface water mapping indicates flooding around the edge of the site which may affect site access.
Brampton	

R 1 - Land south of Carlisle Road	Heritage Assessment The heritage assessment should state: <i>"Prehistoric and Roman remains survive around the borders of the site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
R 2 - Land west of Kingwater Close	No further comment
R 3 - Land north of Greenfield Lane	Heritage Assessment The heritage assessment should state: <i>"Roman remains survive around the borders of the site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
Longtown	
R 4 - Site of former Lochinvar School	Highways Assessment The assessment should be revised to state: <i>"Information provided shows an indicative access capable of allowing for an appropriate access for this scale of development. The development of the site should ensure good non-motorised links to the surrounding area as well as improvements to the existing to accommodate the potential increase in use"</i>
R 5 - Land south of Old Road, Longtown	No further comment
Burgh by Sands	
R 6 - Land west of Amberfield	Highways Assessment The assessment should state: <i>"Access should be safe and the development of the site should ensure good non-motorised links to the surrounding area"</i> Heritage Assessment The heritage assessment should state: <i>"An archaeological evaluation has revealed Roman remains surviving on the site. These will need to be investigated and records prior to development commencing."</i>
Cummersdale	
R 7 - Land east of Cummersdale Road	Heritage Assessment The heritage assessment should state: <i>"An archaeological evaluation has revealed Roman remains surviving on the site. These will need to be investigated and records prior to development commencing."</i>

Cumwhinton	
R 8 - Land adjacent to Beech Cottage	No further comment
R 9 - Land west of How Croft	Highways Assessment The assessment should state: <i>"The splays from the site seem problematic and might need an alternative access point. There should be no significant highways issues. The access will need to comply with adoptable road criteria. A speed survey will be needed to inform the aforementioned splay requirements"</i>
Houghton	
R 10 - Land at Hadrian's Camp	No further comment
Harker	
R 11 - Kingmoor Park Harker Estate	No further comment
Moorhouse	
R 12 - Land east of Monkhill Road	Heritage Assessment The heritage assessment should state: <i>"Prehistoric remains survive adjacent to the site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
Linstock	
R 13 - Linstock North	Heritage Assessment The heritage assessment should state: <i>"Prehistoric remains survive adjacent to the site. An archaeological investigation will need to be carried out prior to any development commencing."</i>
Rickerby	
R 14 - Land at Tower Farm	No further comment
Scotby	
R 15 - Land north of Hill Head, Scotby	Heritage Assessment The heritage assessment should state: <i>"Prehistoric remains survive adjacent to the site. An archaeological desk-based assessment and field evaluation will be required at the planning application stage."</i>
R 16 - Land at Broomfallen Road	No further comment
Warwick Bridge	

R 17 - Warwick Bridge/Little Corby North	Lead Local Flood Authority Flood and drainage assessment should have the 3 rd comment deleted.
R 18 – Land to the south of Corby Hill/Head Nook Road, Corby Hill	No further comment
Wetheral	
R 19 - Wetheral South	No further comment
R 20 - Land west of Steele's Bank	No further comment
Wreay	
R 21 - Land west of Wreay School	No further comment

3. By way of general point. The assessment of drainage should refer to the Lead Local Flood Authority alongside the Environment Agency and United Utilities.

Appendix C – Detailed comments with respect to the Infrastructure Delivery Plan

1. Infrastructure to support the growth aspirations of a location is essential in ensuring the deliverability of a local plan and the sustainability of the communities it seeks to create. It is therefore imperative that the Carlisle Local Plan is supported by a comprehensive Infrastructure Delivery Plan (IDP) that establishes what infrastructure is required to deliver the sustainable development aspirations of the Carlisle Local Plan.
2. While the current IDP is considered to be fundamentally robust, it will need to be subject to continuing review as new evidence, for example about infrastructure needs and funding opportunities, becomes available.
3. To aid continued refinement, detailed comments and insertions for the latest version of the IDP have been provided below.

Section 106 Agreements

4. In September 2013, Cumbria County Council adopted its Planning Obligations Policy. The policy document details the scope and range of planning obligations that Cumbria County Council as consultee, working with Cumbria's District and National Park authorities, may seek to secure through the planning process. In doing so it promotes a consistent and transparent approach so that communities and the development industry are able to see and understand how development in their area is making a fair and positive contribution to sustainable communities. Since its adoption it has been in widespread use and has assisted Inspectors during the consideration of appeals.
5. While recognition of the need to work with the County Council in paragraph 5.7 is welcome, it should be extended and make reference to the County Council's Planning Obligations Policy. Therefore above paragraph 5.7 add a new paragraph stating:

In September 2013, Cumbria County Council adopted its Planning Obligations Policy. The policy document details the scope and range of planning obligations that Cumbria County Council as consultee, working with Cumbria's District and National Park authorities, may seek to secure through the planning process. In doing so it promotes a consistent and transparent approach so that communities and the development industry are able to see and understand how development in their area is making a fair and positive contribution to sustainable communities. The City Council will work with the County Council and other infrastructure

providers to consider the effects of development and to secure necessary developer contributions.

Community Infrastructure Levy (CIL)

6. Strategic education and highway infrastructure and these may be most effectively delivered through CIL and the IDP should be stronger in recognising the value of CIL in delivering strategic infrastructure.
7. Moreover, it is considered important that Carlisle City Council now commence detailed feasibility work on the scope and viability of CIL. It is considered that the outputs of this work be reflected within an updated IDP.

Highways and Transport

8. The Council is satisfied that the Highways and Transport element of this report is robust and sets out a strategic approach to the identification of strategic highway and transport infrastructure requirements across Carlisle.
9. In arriving at this point, Carlisle City Council and Cumbria County Council have worked closely together through the joint preparation of the Carlisle Transport Improvements Study. The study identified a range of 11 junction and 21 sustainable transport improvements needed to support the sustainable development of the City. While fundamentally robust, there are elements of text that would nonetheless benefit from enhancement and increased clarity.
10. To reflect the current funding situation paragraph 2.40 should have an additional sentence stating:

It is therefore essential for developers to consider the accessibility of their developments and as part of the Transport Assessment / Travel Plan process, identify means to ensure visitors and residents can have suitable access by all non-private car means of transport. In keeping with the opportunities highlighted in the Transport Improvement's Study, on some sites developers may need to work with bus operators to deliver improved services.

11. The Council suggests revising the wording at Paragraph 2.51 to read:

The study also provides estimated costs for these potential improvements. The improvement costs are estimated based on rates for previously completed similar projects. They do not include direct costs for risks such as public utilities and land acquisition but do include a contingency allowance. The costs are set out in the following tables:

12. In Paragraph 2.53 the sentence: “*This will include a detailed assessment of the transport impacts of the development such as accessibility, highway design and safety*” should be revised to state:

This will include a detailed assessment of the transport impacts of the development at the time of the application, such as accessibility, highway design and safety.

13. In Paragraph 2.59 the sentence: “*However, any additional, new infrastructure will need to be funded from this local maintenance budget and commuted sums will be required to provide future maintenance of new infrastructure.*” Should be revised to state:

However, the maintenance of any additional S278 secured infrastructure on the highway or some new highway within a development site (i.e. when non-standard or nonessential designs and materials are used) will need to be funded from commuted sums. These sums are required to enable the County Council to adequately maintain the infrastructure upon adoption, usually for a period of 30 years with the exception of highway structures, when the period of time and amount will depend on the type of structure to be delivered.

14. In Paragraph 2.61 – references to the Highways Agency should be replaced with *Highways England*.

15. Up-date paragraph 2.46 to state:

The Department for Transport responded to the franchise consultation in February 2015. Many of the requests from the County Council and LEP were taken on board. Of benefit to Carlisle, this includes:

Cumbrian Coast Line:

- ***Sunday services along the full length of the line between Carlisle and Barrow;***
- ***An increase in the number of services and re-timed services to support existing nuclear developments;***
- ***Later evening services along the full length of the line.***

Settle-Carlisle Line:

- ***A new service out of Leeds in the afternoon peak time through to Carlisle by December 2019;***
- ***An additional evening journey from Carlisle back to Leeds by December 2019.***

Tyne Valley Line:

- ***Doubling the number of trains between Carlisle and Newcastle from the current 1 per hour to 2 per hour.***

Anglo-Scottish Services:

- ***An additional evening service between Manchester-Glasgow.***

Education Provision

16. Education is an essential part of our social infrastructure and therefore needs to be planned for. New housing development may increase the number of children in a location beyond what some schools, in their present forms, will be able to accommodate. It is therefore important that regard is had to the cumulative effects of all developments on schools across Carlisle.
17. We are aware of the need for more primary and secondary school places in different parts of the Carlisle District arising from the proposed new housing development sites in the Local Plan. Developer contributions will be sought to fund the additional spaces either in the form of extensions to existing schools or where required new schools will need to be provided.
18. Building upon the consultation IDP and the County Council's May 2014 Local Plan Response, Cumbria County Council will continue to work closely with Carlisle City Council to quantify the effects of development and how to deliver the required educational infrastructure to support the housing development growth.

Household Waste Recycling – Waste Disposal

19. This section is considered largely robust. The only suggested amendment is the provision of an additional sentence at the end of paragraph 3.17 stating:

It remains to be seen if a new landfill would be a viable proposition.

Adult Social Care

20. While the IDP is considered to be fundamentally robust, there are a number of amendments the Council would wish to see.
21. The IDP needs to recognise the role of good housing design, and the potential of developer contributions in making sure new development is sustainable. To achieve this, the following should be added to the end of paragraph 3.40: :

To help ensure the sustainability of development, we will be expecting designs to be more easily adopted to meet the through life needs of occupiers and in some cases, developer contributions may be used to ensure this.

22. A new Extra Care Housing Scheme is due to open in Brampton. This needs to be reflected within the IDP. To do this, paragraph 3.43 needs an additional bullet point stating:

Brampton (38 Flats) is to be provided by Impact Housing Association

23. Following this, Paragraph 3.44 should state:

Combined these will provide 102 Flats.

Flood Risk

24. The Carlisle City Council has been engaging with Cumbria County Council, United Utilities and the Environment Agency with respect to flood risk for the Local Plan and IDP. To provide more clarity in the IDP text, the Council has a number of suggestions to make:
25. In Paragraph 2.2 and 2.3 reference to “defences” should be replaced by ***“assets/defences”***. Paragraph 2.2 should also list the LLFA as a body that holds detailed records.
26. In Paragraph 2.7 the words “good planning” should be replaced by ***“sustainable drainage”***. The paragraph should include an additional sentence stating: ***“As of April 2015 Cumbria County Council as Local Lead Flood Authority became statutory consultees to the Local Planning Authority for drainage on all major developments”***.
27. In Paragraph 2.9 the statement; “*how they came to be constructed*” should be replaced by: ***“ownership or landowner in which it lies”***.
28. In Paragraph 2.10, reference to “*one or two years*” should be replaced by ***“three of four years”***.
29. In Paragraph 2.11 references to: ***“(FCERM GiA bid made March 2014)”*** should be removed.
30. Paragraph 2.13 should be clear that schemes for main rivers and coastal are looked at by the EA, whilst schemes to protect from surface water and ground

water flooding are put forward by the LLFA. It also needs to recognise that FCERM GiA no longer covers 100% cost of the scheme and therefore partnership contributions are required. Possible partnering funding could be from CIL, LEP (LGF and ESIF).

31. It is considered that Paragraph 2.14 and 2.15 can be merged and reduced.Paragraph 2.16, which is irrelevant, can be deleted.
32. It is considered that Paragraph 2.18 concentrated on the need for Development Management to work with the Environment Agency and the Lead Local Flood Authority to minimise the risk of flooding but endeavour to work with the developer to build sustainable drainage systems.

Telecommunications and Broadband

33. The elements of the IDP addressing these are not fully up to date. Revised wording is set out in Annex A to this document.

Libraries

34. While not proposing major adjustment, it is proposed that the library assessment undertaken in support of the Local Plan would benefit from the revision set out in Annex B.

Annex A – Telecommunications and Broadband

The text concerning telecommunications and broadband should be revised as below:

Telecommunications

Current Provision

1. *The District is generally well served by mobile phone network coverage. Almost everywhere is capable of receiving a basic ‘2G’ service (phone calls and text messages), with the exception of the most remote parts of the District such as in the far north east, around Bewcastle and small patches of higher ground to the south east, beyond Castle Carrock.*
2. *Mobile internet services (3G) are enjoying increasing provision across the District. The Carlisle urban area enjoys near complete network coverage, beyond this however services are limited. There is coverage in Brampton and Longtown and this is expected to continue to expand into more rural areas across the District through the expansion of 3G nationally funded both by the Broadband Delivery UK’s (BDUK) Mobile Infrastructure Project, which is providing funding to cover ‘not spots’ for mobile signal, and the changes in the mobile spectrum purchase obligations of mobile network operators who are being encouraged to meet geographical rather than population coverage targets.*
3. *Superfast mobile internet, known as 4G, is currently only available within the urban area of Carlisle. It is expected that coverage will expand to include other settlements within the District as the Government begins to include geographical rather than population coverage targets in the mobile spectrum purchase obligations of mobile network operators; details of when or where these services will be rolled out is not currently available.*

What is needed to support the Local Plan?

4. *Mobile internet is going to play an important role in providing broadband internet to the most remote rural communities, which in turn is an important aspect of supporting the economic growth of rural communities. By ensuring people and businesses in rural areas are able to connect reliably and quickly to the internet we can help them to overcome the physical boundaries that a remote or isolated location can create. Within more urban areas, encouraging the growth of a comprehensive superfast mobile internet service through 4G would help to bolster Carlisle’s image nationally and make it a more attractive location for potential investors. New masts and the upgrading of existing ones to support new technologies will be required to improve coverage across the District and to expand 4G services.*

Who will provide new infrastructure?

5. *Mobile phone masts are constructed and maintained by the various mobile network operators. There is currently a Mobile Infrastructure Project being undertaken by BDUK, which is being managed nationally to provide funding to construct masts in areas which are not able to be commercially covered by mobile network operators commercially.*
6. *To provide services mobile operators must purchase mobile spectrum from the Government. Historically the Government has put coverage obligations on purchasers of mobile spectrum based upon population; this has led to poor coverage in sparsely populated areas like the wider Carlisle District. The Government is currently changing its approach to focus on geographical coverage obligations for mobile operators which is expected to significantly improve the coverage across the District in the next few years.*

Summary

7. *The quality and coverage of telecommunications is improving across the District. The provision of masts offering 3G/4G coverage is the responsibility of the various mobile network operators, and, as such, there is little the IDP can do to influence this provision beyond supporting the planning applications for new infrastructure planned either commercially or the BDUK Mobile Infrastructure Project. The IDP will, however, continue to monitor the expansion of this important infrastructure network.*

Broadband Internet

Current Provision

8. *Historically across the District broadband access has varied significantly, however infrastructure across the county as a whole has been improved significantly in the past few years through a combination of increased commercial infrastructure deployment and the Connecting Cumbria project which is part of the Broadband Delivery UK (BDUK) national programme to improve broadband infrastructure across the UK.*
9. *As a result of both commercial service deployment and the Connecting Cumbria project, most of the city now has access to fibre optic cable broadband technically capable of speeds between 30 to 75Mbps. Overall within the District, 73% of properties as at April 2015 have access to fibre optic cable broadband with further improvements planned to bring this to approximately 80% of properties by Spring 2016.*

10. *Further work is planned, through the Connecting Cumbria project and BDUK, to make provision for all properties throughout the county, to be able to access services at a speed of at least 2Mbps. This scheme is due to be rolled out from December 2015.*

What is needed to support the Local Plan?

11. *The Government has set a national target of having all households in the UK able to connect to the internet at a speed of at least 2Mbps by 2016, in Cumbria this scheme will be delivered through Connecting Cumbria. The Government have also set a further target that 95% of properties across the country will have access to superfast broadband, technically capable of speeds of at least 30Mbps, by the end of 2017. Carlisle must play its part in working towards the achievement of these targets and policy in the emerging Local Plan aims to facilitate an increase in well-connected homes and businesses.*
12. *Developers will be required to consider available broadband provision in the area they are proposing to build, including any community led broadband initiatives, and will have to justify why they cannot achieve a connection technically capable of speeds of at least 30Mbps. Support for community led initiatives will be vital to enable the growth of broadband in rural areas, and to provide developers with a means to furnish proposals with fast broadband connections.*
13. *Furthermore, developers should be encouraged to incorporate into building plans provisions for connecting broadband infrastructure, ideally fibre optic cable broadband, at the initial design stage.*

Who will provide new infrastructure?

14. *Retail broadband services are provided by internet service providers, who either develop their own broadband infrastructure networks, as Virgin Media predominantly does, or purchase access to large scale broadband networks on a wholesale basis. The two largest companies actively seeking large-scale expansion of fibre-optic networks are BT Openreach and Virgin Media, with incentives for this nationally from the Government as part of its superfast broadband ambitions. In addition to the large broadband infrastructure providers there are a number of small broadband infrastructure providers working in the District and satellite based broadband services are also available.*

15. *The Government has a target of 95% of properties in the UK being able to access to superfast broadband, technically capable of speeds of at least 30Mbps, by the end of 2017. To support delivery of this in commercially challenging areas of the UK a number of projects have been contracted through BDUK to provide gap funding for infrastructure building. Connecting Cumbria is the local delivery arm of this programme for the county and currently aims to make fibre optic broadband available to 93% of properties in the county by 2016.*

What will be the likely cost of new infrastructure?

16. *Costs for creating superfast broadband provision can vary significantly, depending on the scope of a project. Around 60-80% of the costs associated with installing fibre optic cable are due to the civic works that are required to get cables underground and into properties, the ducting required to hold the cable and indeed the cable itself. Digging work can incur costs of up to £100 per metre, depending on the topography and terrain – especially if a highway needs to be cut into.*
17. *Rural Devon, an organisation looking at establishing community broadband initiatives in Devon has assessed the levels of funding that would be required before a broadband company would be able to install fibre optic cables in an area. To install fibre-to-the- home broadband, which is the most efficient and future-proof approach, subsidies of between £2,000-3,000 per property would likely be required. This subsidy amounts to a significant proportion (~90%) of the capital amount. The high costs are driven by the average costs incurred when deploying fibre along the typically long distances to sparsely populated rural areas.*

How would future provision be funded?

18. *BDUK has an ambition that all properties within the UK be able to access superfast broadband and it is expected that schemes for the delivery of these services to the most difficult to serve parts of the UK will be put forward for Government consideration within 2015. Within the urban area demand should exist to make continuous improvement of high speed networks viable, however, it is expected that Government initiatives will be required to extend and encourage further improvement in rural areas where purely market driven broadband schemes are unlikely to be viable.*

Gaps in funding

19. *None of the initiatives in Cumbria that have secured funding for community broadband schemes are within Carlisle District. This could mean that a significant funding mechanism to provide fast broadband in the rural north and east of the District is not available, beyond the Connecting Cumbria project which is working county wide, making it harder for any community broadband schemes to come forward in these areas.*
20. *Whilst there is a policy within the Local Plan, contributions to broadband provision from new developments will need to be balanced against other priorities and ultimately within the parameters of viability.*

Summary

21. *Broadband speeds have significantly increased in the last few years across the District as improvements are made to communications infrastructure both by an increased commercial deployment of broadband and the Connecting Cumbria project. The Plans strategy to concentrate the majority of the additional growth on the City should act to ensure that most new developments are in areas where there is a realistic prospect of benefiting from investment in and the expansion of existing networks. To a lesser extent focussing rural growth predominately in the key settlements of Brampton and Longtown should also ensure likewise. Although it is recognised that initiatives to secure faster broadband speeds in other rural areas should also be supported where they arise.*

Annex B – Library Provision

The text concerning libraries should be revised as below:

Current Provision

1. *The main library within the District, is at The Lanes in Carlisle, one of the busiest libraries in the north of England. There are other staffed libraries in the towns of Brampton and Longtown; as well as libraries on estates in Carlisle at Morton, Harraby and Denton Holme, which are run from local community centres. There are also a range of book drops in other community buildings.*
2. *A mobile library van serves villages and remoter locations across the district area. It provides an enhanced service to the larger village of Dalston twice a week.*

What is needed?

3. *The County Council is responsible for delivering the library service across the District. Unlike medical services, utilities or school places the service is not dependent on patronage based on where people live. Customers of libraries do not necessarily exclusively use a library close to their own homes and they may use a library near where they work or where they choose to shop.*
4. *The level of service across the district is kept under constant review, and there are currently no specific library deficits that exist within the District, but conversations continue to establish a clear need for additional provision.*

Summary

5. *There is considered to be no requirement for additional library facilities to meet requirements however this position will remain under review.*

Appendix D – Comments from workshop held with Carlisle Local Committee Members

On 21 May 2015 a workshop was arranged with the Cumbria County Council members for Carlisle. The purpose of the meeting was to discuss the Carlisle District Local Plan Proposed Submission Draft.

The following councillors attended:

Cyril Weber (Chair)
John Mallinson (Vice Chair)
Reg Watson (Chair of Highways Working Group)
Lawrence Fisher
William Graham
John Bell

In addition officers from the County and City Council were present to assist.

Set out below is the key feedback received from members grouped under the key topic areas of; Strategic Policy, Specific Locations and Development Sites

Strategic Policy

- Members expressed support for Carlisle City Council to progress development of a CIL as they consider this important if Carlisle is to deliver the infrastructure it requires.
- A member raised some concern that if CIL is introduced it may affect the viability of housing development in Carlisle.
- Members wished to ensure that local schools had capacity to accommodate the effects of development and where not, developer contributions should be used to provide the spaces needed.
- Members wished to see development sites in locations where residents would have access to public transport and for larger sites to accommodate the routing of bus services.
- Members wished to ensure that development sites provide sufficient open space and integrate with their surrounding areas. Where developments sites adjoin they also wished to see a “joined-up” approach to the design of open space to be undertaken.
- Members raised concerns that inappropriate development may detrimentally affect the character of villages and that important land between settlements may be encroached upon.
- Members considered that development at the Citadel needs to be a key priority for the City Centre and welcomed recognition of the site importance in the draft plan.

Specific Locations and Development Sites

- To the north of the River Eden in Carlisle, members were aware that there are limited school places and for developments to fund the spaces required as they come forward (sites ref. U1, U2, U10, U11 and U16).
- A member expressed concern about the effects of traffic of the development sites proposed in the south east of the City. In particular there was concern about the potential for “rat running” through unsuitable parts of the highway network and increased congestion at junctions. In addition it was asked that new developments demonstrate how they would integrate with passenger transport service provision. (sites ref. U3, U4, U5, U13, U14 and U19).
- A member considered that the site of the Pennine Way Primary School (ref. U3) would be a good location for accommodation for those with increased care needs or elderly due to its proximity to the new community facilities being delivered on adjacent land.
- Members raised concerns about the potential for new development to increase congestion on London Road and expressed concerns about new developments accessing directly on to a busy route.
- In west Carlisle it was reported that there were already concerns about traffic speeds and safety, and concern was expressed about the possible effects of new development (sites ref. U6, U7 and U8) - new development sites needed to recognise this potential impact and integrate effectively with the existing road network.
- In Longtown a member highlighted that development value means sites may not be able to sustain the same levels of affordable housing as other parts of the district and welcomed the Local Plan’s reduced level of requirement for the town.
- A member was concerned about development in Wetheral (site ref. R19 and R20) encroaching into open countryside, which changes the character of the village. The member also highlighted that local schools may not have the space to accommodate the effects of further housing development.
- In Warwick Bridge, a member expressed concern about the suitability of prospective access arrangements to site R17.