

REPORT TO EXECUTIVE			
PORTFOLIO AREA: INFRASTRUCTURE, ENVIRONMENT AND TRANSPORT			
Date of Meeting:	28 JANUARY 2002		
Public			
Key Decision:	Yes	Recorded in Forward Plan:	Yes
Inside Policy Framework			

Title: STRUCTURE PLAN CONSULTATION

Report of: DIRECTOR OF ENVIRONMENT AND DEVELOPMENT

Report reference: EN.003/02

Summary:

This report summarises the consultation process and leaflets prepared as part of the review of the Structure Plan.

Recommendations:

It is recommended that the recommendations in Appendix One are forwarded as the City Council's response to the consultation.

Mike Battersby

Director of Environment and Development

Report to Chairman and Members of EN.003/02

Executive

1. BACKGROUND INFORMATION AND OPTIONS

1.1 The County Council and Lake District National Park Authority are required under the Town and Country Planning Act 1990 to jointly prepare a Structure Plan for Cumbria. The current Structure Plan is scheduled for review and the two authorities have produced a consultation leaflet entitled "Planning Cumbria". The Joint Structure Plan when combined with the Carlisle District Local Plan forms the Development Plan for Carlisle District.

2. CONSULTATION

1. The City Council is a statutory consultee in the process and have been asked to provide comments by the 31st January 2002.
2. As the review continues the City Council will be consulted on the Deposit version of the Plan which will set out the detailed policies relating to the issues identified in this consultation.

3. STAFFING/RESOURCES COMMENTS

3.1 There are no additional implications arising from this consultation.

4. CITY TREASURER'S COMMENTS

None

5. LEGAL COMMENTS

None

6. CORPORATE COMMENTS

6.1 A number of officers throughout the Council have been consulted on the Structure Plan consultation leaflets. Their comments have been incorporated in the attached report outlining the main issues to be addressed by the Structure Plan.

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7. RISK MANAGEMENT ASSESSMENT

Not applicable

8. EQUALITY ISSUES

The consultation is open to all residents, businesses and other interested parties to make comments to the County Council.

9. ENVIRONMENTAL IMPLICATIONS

9.1 The policies of the Structure Plan that will be developed from this consultation will address a number of environmental issues. Any comments relating to this area are referred to in response to the "Caring for the Environment" leaflet.

10. CRIME AND DISORDER IMPLICATIONS

None

11. RECOMMENDATIONS

It is recommended that the recommendations in Appendix One of this report become the Council's response to the Structure Plan consultation.

12. REASONS FOR RECOMMENDATIONS

12.1 The Structure Plan tackles a number of strategic issues for Cumbria. The role of the Structure Plan is to interpret National Policy Planning Guidance and Regional Planning Guidance. It will also provide the background for the City Council to establish policies for development in the Carlisle area.

12.2 The Structure Plan is well established in Cumbria and as such many of the issues are already covered in the existing Plan. Many of the changes identified are in accordance with national planning policy. It is therefore appropriate for the Structure Plan to address such issues.

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12.3 Appendix One sets out the main points of each of the consultation leaflets as they affect Carlisle District. The officer response is to enable the future growth of Carlisle's economy based upon a sustainable development approach. This is already encompassed in the Carlisle District Local Plan.

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APPENDIX ONE

PLANNING CUMBRIA

STRUCTURE PLAN CONSULTATION NOV 2001-JAN 2002

RESPONSE OF CARLISLE CITY COUNCIL

1.0 STRUCTURE PLAN STRATEGY

1.1 The strategy of the Structure Plan must ensure that the needs of Cumbria and the Lake District are met, whether the need is to encourage economic growth or protect its valuable environment.

1.2 In order to do this the Structure Plan promotes a Sustainable Development Strategy which aims to reflect the Government's four sustainable development objectives: Social progress which recognises the needs of everyone; effective protection of the environment; prudent use of natural resources; maintenance of high and stable levels of economic growth and employment.

1.3 The aim of the strategy is therefore to realise the potential of urban areas to act as a focus for new development whilst supporting and revitalising rural areas. A sustainable strategy is already one that is being promoted in the Carlisle District Local Plan by concentrating development in the urban area.

Recommendation 1

Officers recommend that the sustainable strategy promoted by the Structure Plan consultation is supported.

1.4 To progress the Strategy the consultation leaflet recognises economic and geographical differences within the County.

City of Carlisle

1.5 The Structure Plan consultation recognises the role of the City as a "Regional City" as referred to in Regional Planning Guidance. The Structure Plan will seek to ensure growth is co-ordinated and satisfies needs whilst not affecting the area's cultural heritage and environmental quality.

Recommendation 2

Officers recommend that this role is supported.

1.6 The consultation recognises the need to increase the overall attractiveness of the city for private investment. Major retail and leisure development will be directed to the city centre, this is in line with PPG6 in supporting the commercial function of the city centre. The consultation acknowledges the need to focus on the regeneration of Botchergate. This will continue to be a focus of the current efforts of the Council however, other regeneration issues may arise during the life of the Structure Plan.

Recommendation 3

Officers recommend that the Structure Plan should enable regeneration within Carlisle District however the Structure Plan should not be specific about individual sites in policies. Regeneration is a dynamic issue and the nature of regeneration problems and the sites to which they relate will change during the Structure Plan period.

1.7 The consultation recognises the role Kingmoor Park performs in promoting economic growth of the City. In addition to the needs of the city,

the regional role this site will perform in job creation is acknowledged. The Structure Plan will therefore safeguard this site and the Carlisle Northern Development Route to ensure it can be adequately serviced. The consultation also makes a short reference to the closeness of Carlisle Airport.

Recommendation 4

Officers recommend that the role of promoting economic growth of Carlisle is supported along with safeguarding the site of Kingmoor Park and the Carlisle Northern Development Route. Greater attention should be paid to the role Carlisle Airport can play in the growth of Carlisle's Economy.

1.8 The consultation states that Carlisle will be expected to accommodate a significant amount of housing needed within the County. Brownfield land will be given a priority with consideration given to refurbishment and redevelopment of the existing housing stock. The consultation realises that some greenfield development may be necessary –

Recommendation 5

Officers recommend that this approach to housing development for the city is supported.

1.9 Support is given to promoting an integrated approach to transport and the options to do this will be a factor in locating new development.

Recommendation 6

Officers recommend that an integrated transport approach is taken into account in assessing the location of development. This will reinforce the premise for Carlisle to be the focus of development.

1.10 The consultation recognises the city's unique heritage by promoting strategically important gateway views including the M6 corridor and River Eden/Bitts Park/ Carlisle Castle corridor. Recognition is given to the importance the green setting of Carlisle plays in making it an attractive environment and that future development should respect its natural and built heritage.

Recommendation 7

Officers recommend that this role is supported.

North Cumbria (excluding City of Carlisle)

1.11 This includes the remainder of Carlisle District outside the City and seeks to ensure the rural area is sustained. Brampton and Longtown are referred to as having wider community role thereby making them the focus for appropriately scaled development for housing, employment, retail and community facilities.

Recommendation 8

Officers recommend that the role of the market towns as a focus for rural development is supported.

1.12 Elsewhere is unlikely to be suitable for large-scale housing and employment. New buildings for appropriately scaled rural businesses including tourism within or adjacent to villages. An approach that sustains communities in remoter areas around Bewcastle will be promoted.

1.13 Officers welcome the recognition that there is a need to support rural communities in the remoter parts of the district as well as the recognition that there is a continued opportunity to support the economy of other villages.

Recommendation 9

Officers recommend that this type of policy for the rural area is supported.

1.14 The Structure Plan aims to protect Solway Coast AONB and Hadrians Wall World Heritage Site from inappropriate development.

Recommendation 10

Officers recommend that the protection of designated sites is supported.

2.0 PROVIDING NEW HOUSING

Distribution of Housing

2.1 The Structure Plan uses draft Regional Planning Guidance (RPG) as the basis for the distribution of new housing. The RPG requires Cumbria to provide 27,500 dwellings between 1996 and 2016. It also states that the emphasis should be towards regional towns and cities i.e. Carlisle and Barrow. This has been reflected in the proposed distribution of housing allocated to each district.

2.2 For clarification, the figures provided in RPG have already made assumptions about demolitions and the number of empty properties in the area. This is built into the allocation figure. The total number of dwellings relates to net gain to housing stock.

Suggested allocation	Houses completed 1996-2000	Houses with planning permission at 2000	Allocated in local plan at 2000	Remaining houses needed 2000-2016
6500	1325	2020	1075	2080

2.3 For Carlisle, the proposed figures ensure that the number of new houses to be built will not be constrained below demand. Carlisle has the largest allocation of 6,500 dwellings during the period. As there is an overlap between the current plan period some of these dwellings have already been built, others have planning permission and additional land already allocated in the current Carlisle District Local Plan. This means additional 2080 dwellings to be constructed by 2016.

2.4 Officers consider that this level of provision will assist in meeting the economic growth of the City and provide sufficient housing to give a choice of housing to existing and new residents.

Recommendation 11

It is recommended that the proposed allocation of housing for Carlisle is supported.

Affordable Housing

2.5 The Structure Plan has a role in ensuring sufficient housing is available to meet the needs of the local population. Affordable housing is a problem in some parts of the County. In Carlisle urban area house prices are relatively low and affordable by many of the local population. In some parts of the rural area house prices are higher and may need the construction of affordable housing during the plan period. Concern has also been raised at the currently low mortgage rates, which may cause longer term problems for home owners.

Recommendation 12

Officers recommend that the Structure Plan adopt a flexible approach to affordable housing to ensure that during the Structure Plan period affordable housing can be provided where need is identified. This is to ensure affordable housing is not totally restricted in Carlisle District.

Managing Supply of Housing

2.6 In dealing with the supply of housing Government targets require 60% of new housing to be provided on brownfield land nationally. The Structure Plan recognises this need and acknowledges RPG, which sets a target of 50% for Cumbria. The Structure Plan raises the question whether targets should be set for each district.

2.7 Officers question the benefit of having district targets in the Structure Plan. In order to reach the RPG and national brownfield targets it is the process of site selection for allocating housing sites and reallocating land that is important. Officers consider that the Structure Plan policies should ensure that PPG3 sequential approach to site allocation ensures brownfield sites are considered first. They should also set the framework for Local Plan policies that will guide development to brownfield land. Brownfield land should be developed for its most appropriate end use. This should not be obscured by the need to reach a specific target for housing.

Recommendation 13

It is recommended that targets for brownfield development for housing are not included in the Structure Plan.

3.0 SUPPORTING THE ECONOMY

Employment Land

3.1 The Structure Plan should provide an adequate supply and range of employment land to meet the needs of the economy. This is currently achieved by ensuring a five-year supply of land in key market sectors. As one of those sectors, the consultation recognises the designation of Kingmoor Park as a Regional Investment Site in accordance with RPG and the role this performs in Cumbria's economy.

Recommendation 14

It is recommended that the designation of Kingmoor Park as a Regional Investment Site is supported.

3.2 The consultation raises the question of individual district requirements for the provision of land. Currently the land is provided by sector for the whole of Cumbria. On an individual basis this would mean that land is tailored to the specific needs of the district. This would be of benefit in Carlisle to ensure Local employment sites are provided in addition to Kingmoor Park to assist different sectors of the economy.

Recommendation 15

Officers recommend that the Structure Plan ensures sufficient land is provided for the needs of each of the districts across different sectors of the economy.

3.3 Employment land should be developed in the most appropriate locations. The consultation recognises the need to provide serviced sites for new development as well as carrying out improvements to older industrial estates. The Structure Plan also recognises the need to encourage development near to further education establishments.

Recommendation 16

Officers recommend that this is supported as it recognises the need to remain competitive as well as build no new opportunities in the economy.

3.4 The consultation also questions the existing supply of employment land and whether it is appropriate. It suggests that if land is unattractive to developers it should be redesignated for alternative uses.

Recommendation 17

It is recommended that this methodology is supported. Officers recognise that to maintain economic growth in Carlisle it must be able to attract investment. A reappraisal of existing sites is fundamental to improving Carlisle's economic prospects.

Tourism

3.5 The Structure Plan consultation promotes the development of sustainable tourism based on Cumbria's environmental quality, culture and heritage. The consultation recognises that this is achievable under current Structure Plan policies however it proposes that more explicit guidance is prepared on location, type etc.

3.6 Officers welcome additional guidance on sustainable tourism development however this should not be overly prescriptive to prohibit innovative tourism development.

Recommendation 18

It is recommended that sustainable tourism development policies are supported in the Structure Plan

Rural Diversification

3.7 Carlisle District has been severely affected by foot and mouth, which has resulted in raising the issue of farm diversification. The consultation recognises the need to promote measures to diversify the economy. There is a need for diversification to respect the local heritage, environmental quality and community needs. The consultation also recognises the need to maintain the viability of farming as part of the local economy.

3.8 The role of market towns and large villages as a preferable focus for diversification opportunities is highlighted in the consultation but the contribution the conversion of farm buildings can make needs to be balanced against the wide dispersal of activities, which will threaten the vitality of villages.

Recommendation 19

It is recommended that the approach to rural diversification as proposed in the consultation is followed in the Structure Plan.

4.0 CARING FOR THE ENVIRONMENT

Landscape

4.1 Existing Structure Plan policies are already in place for the protection of National designations i.e. National Park, Area of Outstanding Natural Beauty. In addition landscapes of county importance have been designated to protect their distinctive character. The consultation advises that the County Council is evaluating the designation of County landscapes to redefine the policy framework. County landscapes have been a valuable planning tool for Carlisle District and their designation has been used, and supported on appeal, to refuse planning applications, which would harm the landscape. Officers are concerned about the impact of development on the landscape outside the national designations should the County landscape designation be removed. The Structure Plan should consider policies that protect the general landscape from poorly designed or located development.

4.2 The consultation notes the impact of development outside the boundaries of designations on the designated areas and question whether this should be more strictly controlled? Development on land adjacent to designated areas will clearly have an impact on views of the landscape to and from that designated area. Officers consider that it should not be an area for inferior design or developments of a nature that would not get permission in the designated areas because of the landscape impact. The Structure Plan should contain policies to limit the impact of development on the landscape of the designated areas.

Recommendation 20

It is recommended that the Structure Plan should ensure the landscape is protected from inappropriate development and that land outside national designations should not be seen as an opportunity for poorly design or located development.

Wildlife conservation

4.3 The Structure Plan already contains policies that protect a range of

conservation interests from international to local designations. Greater recognition could be given for wildlife interests that have developed on derelict land. This would help to encourage provision for wildlife in development. Whilst a lot of sites are protected the Structure Plan will also consider ensuring adequate protection of species particularly with increased access to the countryside.

Recommendation 21

It is recommended that additional protection for wildlife is supported.

Buildings, archaeology and historic sites

4.4 It is proposed that the Structure Plan will continue to prevent development from removing, damaging or obscuring important historical or archaeological sites, and ensure good design in new development. Good design is vital to enhance the quality of the environment, support local distinctiveness, and encourage further investment. The consultation states that the Structure Plan should also ensure that decisions are based on proper evaluation of the archaeological resource.

Recommendation 22

It is recommended that this view is supported however it is also recognised that good design should not be restricted solely to development in a historic context but should be a factor in all development.

Derelict, contaminated and run down land

4.5 The consultation recognises that not all brownfield land is suitable or needed for new housing and industry. It is proposed that restoration of land to appropriate uses should be considered including new businesses and environmental improvements. Policies need to reflect the environmental enhancement and development opportunities available in different areas.

Recommendation 23

It is recommended that policies for brownfield land should include

the most appropriate use for that land.

Forestry and woodland

4.6 With regard to forestry and woodland the Structure Plan has a limited role, as planting is not under planning control. The impact that mass planting can have on the landscape is an important factor that the Structure Plan should take into account in developing appropriate landscape policies. The Structure Plan should also realise the potential for energy crops and the impact this can have on the landscape when considering renewable energy and landscape policies.

Recommendation 24

It is recommended that the forestry and woodland matters are taken into account when developing other policies.

Air, soil and water

4.7 The consultation raises concerns about the potential for development to cause pollution. It proposes that the Structure Plan develop policies which, will take account of the potential to avoid air, soil and water pollution when locating new development.

Recommendation 25

It is recommended this role is supported.

5.0 MANAGING CUMBRIA'S COAST

Coastline management

5.1 The existing Structure Plan does not contain specific policies for the coast and proposals rely on related policies. The consultation suggests that this may no longer be appropriate. The Structure Plan will build upon the coastal zone/shoreline management plans that already exist and address and land use issues identified. This will then be developed further in Local Plans.

Defining the coast

5.2 The Structure Plan will need to define a coastal zone and set out a framework of policies to cater for all coastal types including the designated

coast and remote coastal areas. This builds upon policies contained in draft RPG.

Issues affecting the coast

5.3 The coast offers a variety of opportunities and it is the intention that the Structure Plan will develop policies that would enable development appropriate to the type of coast. It will also fully consider the effect of flooding and erosion particularly in response to climate change.

Recommendation 26

It is recommended that the Structure Plan develop specific policies for coastal areas.

6.0 IMPROVING TRANSPORT AND COMMUNICATIONS

New transport agenda

6.1 Since the existing Structure Plan was approved there have been changes in national policy regarding transport including the Government's New Deal for Transport. The current transport strategy is set out in the Local Transport Plan, which caters for all users and promotes a different approach for different areas. The Structure Plan will need to reflect the Government New Deal for transport and complement and build on the aims of the Local Transport Plan. The Structure Plan Strategy has therefore been developed to reduce the need to travel by car and increase the potential to use public transport. It is also recognised that there will be some villages, which currently have poor public transport, that need development to remain viable.

Strategic transport network

6.2 The consultation recognises that upgrading the transport system to support jobs and regenerate communities is critical throughout Cumbria. Constructing new roads will play a role such as improving road access to Kingmoor Strategic Investment Site. The Structure Plan will therefore need to protect routes and land from development. Although Carlisle Airport is shown on the Strategic Transport Network map in the consultation, no mention is made in the accompanying text in the Improving Transport and Communications leaflet.

Recommendation 27

It is recommended that the protection of routes and land from development to assist strategic transport aims is supported

however recognition of Carlisle Airport's role in the strategic transport network should be made in the Structure Plan.

Widening transport choice

6.3 Re-opening rail routes and stations and the rail freight facilities will be promoted in the review of the Structure Plan. In rural areas there is a need to improve access to services and facilities. The Structure Plan can help by ensuring any new development is located where it helps support the viability of these initiatives.

Recommendation 28

It is recommended that this role is supported

Improvements to Communications and information technology

6.4 The Structure Plan must cater for improvements to communications and information technology whilst safeguarding environmental interests. Policies need to ensure that Telecommunications masts are located where they minimise visual impact. The potential for sharing and sensitive design of equipment needs to be encouraged. The Structure Plan will also need to highlight circumstances to be considered when seeking suitable locations for new telecentre development.

Recommendation 29

It is recommended that this role is supported.

7.0 CONTRIBUTING TO QUALITY OF LIFE

Towns and town centres

7.1 A new approach will be required for the Structure Plan to take into account changes in National policy for a sequential approach for retail, leisure and employment focussing on town centres. The consultation refers to Carlisle as a town centre having clarified its role as a regional city in the economy issue paper, this needs to be consistent. The consultation raises the question whether there are exceptions and if so how should they be treated however the exceptions quoted such as DIY can be sold in town centres offering greater choice of transport i.e. Wilkinsons in Carlisle. If a large enough site is not available the sequential test will be the means to assess suitable sites. Where there are competing uses, Local Plans should be the means to determine the most appropriate land use.

7.2 The consultation recognises that the smaller town centres should only allow development of an appropriate scale. It suggests that the Structure

Plan should consider supporting vulnerable town centres possibly by providing policies that group centres with similar characteristics. Longtown and Brampton provide different roles characteristic of their location. Grouping smaller towns together may be a means to provide more suitable guidance.

Recommendation 30

It is recommended that the Structure Plan contains a clear statement on the role of Carlisle as a regional city and this role should not be confused with town centre when considering retail, leisure or other development. Guidance on exceptions to the sequential approach is not considered appropriate. Developing a policy for the grouping of smaller towns with common characteristics is welcomed.

Vital Villages and Rural services

7.3 The consultation recognises that there is a limited role for the Structure Plan to sustaining facilities in the rural area. However the provision of facilities is desirable and the Structure Plan could focus the location of new development in certain settlements where there are facilities and access to public transport.

Recommendation 31

It is recommended that policies for rural areas focus on sustaining the existing provision of facilities and make provision for new develop to help in this process.

Recreation and health

7.4 Since the existing Structure Plan was prepared national policy has changed towards greater protection of existing sports and recreation facilities. This has helped to safeguard school playing fields. The Structure Plan also provides advice on the general location of major recreational facilities, no facilities are currently mentioned in the consultation.

Recommendation 32

It is recommended that the Structure Plan address major

recreational issues for the County to ensure a consistent approach to the development of facilities.

Servicing new development

7.5 The Structure Plan will continue to ensure new development does not incur a negative impact on the wider community. It may develop a full range of circumstances when contributions towards highway improvements, water and sewerage services, etc would be appropriate. Government is currently reviewing guidance on Planning Obligations, which are used to this end.

Recommendation 33

It is recommended that the Structure Plan take into account new guidance on Planning Obligations. Any policies should be flexible enough to take into account the local impact of development, which may require site specific measures.

7.6 Utilities such as water are essential to quality of life. The Structure Plan will need to protect important natural resources from pollution. The Environment Agency water Source Protection Zones will need to be taken into account in locational policies of the Structure Plan.

7.7 In recent years it has been recognised that flooding can become a more common event. In order to reduce the risk from flooding the Structure Plan proposes to take forward a search sequence for development sites. The Structure Plan may also promote more careful design to assist drainage systems.

Recommendation 34

It is recommended that reducing flood risk is taken into account in Structure Plan policies.

Community support and development

7.8 The Structure Plan has a limited role in community development. The consultation recognises that community strategies are still in their infancy in Cumbria. The consultation states that Structure and Local Plans should be taken into account in community strategies and that the land use elements of those strategies should be incorporated in development plans. It is also recognised that community strategies are at a local level such as Town,

Village or Parish Plans.

Recommendation 35

It is recommended that policies enable Community Strategies to be taken into account in the Development Plan as and when they are produced.

8.0 UTILISING RESOURCES

Energy

8.1 Studies into renewable energy suggest that Cumbria should provide 36% of the region's renewable energy by 2010. Proposals particularly for wind energy can be contentious. It will therefore be the role of the Structure Plan to balance the concerns of reducing the use of fossil fuels against the impact on landscape and amenity. The Structure Plan will also need to take into account changes in renewable energy production that has advanced in recent years. The Structure Plan will therefore need to provide a framework to deal with impacts of different types and scales of renewable energy development and indicate where development has an unacceptable impact.

Recommendation 36

It is recommended that a framework in the Structure Plan is supported.

Minerals

8.2 Since the existing Structure Plan was prepared open cast coal mining has reduced and the use of secondary materials has increased. The framework provided by the existing Structure Plan generally provides a satisfactory approach but the consultation considers more explicit guidance on a variety of matters including social, environmental and economic needs. Safeguarding non-road transport routes, the unavoidable need for mineral extraction in the open countryside, etc.

Recommendation 37

It is recommended that the Structure Plan provides a clear and up-to-date framework for minerals development including additional guidance where appropriate.

Waste

8.3 Increasing volumes of waste to be disposed of at present are posing Cumbria with a major problem. The Government's waste strategy sets out specific targets for sustainable management of waste. The Structure Plan will need to accommodate the changing emphasis of waste management. The Structure Plan will take forward a waste management strategy for Cumbria by enabling the development of a new network of waste treatment facilities. This will need to cater for urban and rural needs and a review of the need for landfill.

Recommendation 38

It is recommended that the Structure Plan take forward the land use implications of the Cumbria Waste Management Strategy.