



The Carlisle District Local Plan
2015-2030

Duty to Cooperate Statement

Feb 2015



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1.0 Introduction

1.1 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities (LPAs) and other bodies to co-operate with each other to address strategic issues in their areas. The duty requires on-going constructive and active engagement on the preparation of local plans and other activities relating to the sustainable development and use of land, in particular in connection with strategic cross boundary matters.

1.2 The National Planning Policy Framework (NPPF) emphasises that the duty relates in particular to the following strategic priorities:

- homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.3 The Framework is clear that joint working on areas of common interest should be undertaken thoroughly for the mutual benefit of neighbouring authorities, and that LPAs should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in Local Plans. LPAs are encouraged to take account of different geographic areas, including travel to work areas, and county and district authorities should cooperate with each other on relevant issues.

1.4 In addition, the Framework sets out the need to work collaboratively with Local Enterprise Partnerships and Local Nature Partnerships in order to deliver sustainable development. The need to work with private sector bodies, utility and infrastructure providers is stated.

1.5 The NPPF states that LPAs will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examination. Various examples are given such as plans or policies prepared as part of a joint committee, or a jointly prepared strategy which is presented as evidence of an agreed position.

1.6 Cooperation is intended to be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

1.7 This statement of compliance with the duty to cooperate sets out how the Council has cooperated with neighbouring local planning authorities and other public bodies in preparing the Carlisle District Local Plan 2015 - 2030. The approach that the City Council has taken by frontloading the consultation process from the very earliest stages of Plan preparation has afforded opportunities for early engagement and establishment of positive working relationships with a wide range of bodies. In addition, the Council's Authority Monitoring Reports (AMR), the most recent of which was released in Feb 2015, set out how the duty has been taken forward on an ongoing basis.

2.0 Cumbria County Council and neighbouring local planning authorities

2.1 Local government in Cumbria is administered by Cumbria County Council and six district planning authorities, of which two, Eden and Allerdale, directly border Carlisle District boundary. Northumberland County Council borders the District to the east.

2.2 Proactive cooperation between the Cumbrian local planning authorities is of long standing. Historically the local planning authorities of Cumbria have been accustomed to cooperation and joint lobbying to achieve a unified voice in securing planning provision of higher order policy on the regional agenda. As such the foundation was laid for the transition into the current duty to cooperate system.

2.3 Cumbria County Council and Carlisle City Council have worked closely during the development of the Local Plan at all stages of its evolution. This has ensured that the policies in the Local Plan have complemented the County Council's interests as a planning authority, highways authority and service provider on behalf of the communities it serves in Carlisle. The County Council has responded to the previous stages of consultation on the draft Local Plan as follows:

- Issues Paper (March 2011) – informal officer comments;
- Issues and Options (November 2011) – informal officer comments;
- Preferred Options Stage 1 (July 2013) – Cabinet endorsed response;
- Preferred Options Stage 2 (date xx) – Cabinet endorsed response.

2.4 In its Cabinet report of 15th May 2014 the County Council noted that;

"The majority of the proposals in the Local Plan preferred options stage 2 are welcomed".

2.5 Ongoing and regular dialogue with the County Council has taken the form of emails, routine liaison meetings, workshops and committees. County Council responses so far have highlighted:

1. the merits in delivering sufficient housing land to meet needs;
2. the value in identifying further employment land close to junction 42 of the M6;
3. the potential benefits of growth in south Carlisle to deliver longer term growth aspirations;
4. the need for comprehensive infrastructure delivery planning;
5. the need for clarity on how sustainable development would be delivered to rural locations.

2.6 In particular the County Council as Highways Authority has, jointly with the City Council, produced the Carlisle Local Plan Transport Study (April 2014) and the Carlisle Local Plan Transport Improvements Study (Feb 2015). The aims of these studies have been to assess the traffic impacts of the Local Plan proposals, and then identify potential measures to mitigate the impact of the proposals. Such measures include new

or improved infrastructure, changes to traffic management, and measures to promote sustainable transport, or encourage modal shift.

2.7 Regular meetings have taken place with neighbouring local planning authorities throughout the evolution of the Plan, and have followed a standard template which sets out the purpose of the meeting, the common strategic issues identified between the authorities, and future actions. An example of one such template is included at Appendix 1. All neighbouring local planning authorities have engaged in the Local Plan consultation process, and there is common agreement that each authority can meet their development needs within their own boundaries.

2.8 Other cross boundary strategic issues include the Hadrian's Wall World Heritage Site, and the two Areas of Outstanding Natural Beauty (AONB) within the District, (the North Pennines and the Solway Coast). Both AONBs are managed by Partnerships which are part funded by the Council. The officer steering groups within the Partnerships are made up of representatives from each relevant local planning authority. The relevant adjoining authorities (Allerdale, Eden and Northumberland) have worked with Carlisle City Council to ensure complementary protective policies for these assets are included within their respective local plans.

2.9 Quarterly meetings take place between all the local planning authorities in the County, together with neighbouring authorities in Yorkshire, Lancashire, Northumberland and south west Scotland, under the banner of Development Plan Officers' Group (DPOG). The aim of DPOG is to provide local planning authorities in Cumbria with a forum that can discuss and advise on implications of planning policy and guidance, help to raise awareness of cross boundary issues, and share best practice on local planning issues.

2.10 In detail, the group has a specific remit to cover the following areas of work under their terms of reference:

- peer review of planning policies at both a national and local level, including supplementary planning documents and neighbourhood plans;
- review of evidence and needs assessments that relate to the strategic priorities set out in paragraph 156 of the NPPF, and to consider any significant issues arising;
- discuss impacts of new EU and national legislation on local plan processes and policies, with a view to providing a common approach and understanding, and consistent implementation across Cumbria;
- discuss and raise awareness of future policies, proposals and plans of other interested parties such as private sector bodies, utility and infrastructure providers;
- engage in cooperation and engagement for issues with cross-boundary impacts.

2.11 In addition to the local planning authority membership of the group, standing invitations are also issued to the Environment Agency and Natural England. Invited speakers are drawn from a range of organisations covering matters such as public health, flooding, Gypsies and Travellers and monitoring.

2.12 All actions arising out of meetings are logged and circulated, and final minutes and agendas for meetings are issued at least seven days before a meeting. In addition, the group liaises with its sister group, the county wide Development Management Officers Group when required.

2.13 Cumbria Planning Group holds quarterly meetings of members and officers with representatives from all the local planning authorities in Cumbria, including Cumbria County Council, and the Lake District National Park Authority. Local Plans and the Cumbria LEP are standing items on the agenda. The group provides an effective forum to discuss cross boundary issues and establish a common approach or consensus on matters that affect the County as a whole.

2.14 The stated purpose of the Cumbria Planning Group under their terms of reference is to coordinate planning activities in Cumbria including joint initiatives and lobbying activities and develop good practice. Membership involves all the local authority partners and the group consists of one councillor from each local authority and an accompanying officer.

2.15 Through the forum of the **Cumbria Housing Group**, joint work originally took place in 2006 on the identification of 20 Strategic Housing Market areas across the County. Updating of this original SHMA work has since been taken by individual local planning authorities, maintaining a common approach to the source and analysis of data using the POPGROUP modelling produced by the Cumbria Observatory and managed by Cumbria County Council. There is an acknowledged agreement between Eden, Carlisle and Allerdale that the Housing Market Areas are contained within LPA boundaries, and that there are no cross boundary issues in relation to housing delivery, either within Cumbria, or between Carlisle and Northumberland, or Carlisle and Scotland.

3.0 Joint evidence with neighbouring local planning authorities

Cumbria Renewable Energy Capacity Study

3.1 The county-wide Cumbria Renewable Energy Capacity Study represents a joint evidence base to assess potential from all renewable energy sources in the county, and involves all constituent LPAs in cooperative effort.

Cumbria Wind Energy SPD

3.2 Cumbria County Council and the local planning authorities in Allerdale, Carlisle, Copeland, Eden, South Lakeland and the Lake District National Park have produced and adopted guidance to help decide where wind farms might be built. This supports Local Plan policy on renewable energy.

Cumulative Impact of Vertical Infrastructure

3.3 A County wide study which also involved Lancashire County Council, commissioned to investigate the cumulative impact of vertical infrastructure on the landscape, in response to the area being subject to increasing pressure to accommodate energy and communications related infrastructure.

- assesses the degree to which developments involving the introduction of vertical elements into the landscape result in cumulative effects on landscape character and visual amenity;
- Identifies the degree to which cumulative effects of vertical infrastructure developments on landscape character and visual amenity may be considered a constraint on further such development; and
- Provides both evidence base and guidance to support local & strategic policy, to be used when considering proposals for vertical infrastructure development.

The Cumbria Gypsy and Traveller Accommodation Assessment (November 2013) (GTAA)

3.4 There is strong evidence of cooperation across the county on assessing the need for traveller accommodation. Cumbria County council, the six district councils and the Lake District National Park Authority commissioned the GTAA, which updated a previous joint GTAA from 2008.

3.5 The overall objective of the research was to provide a robust evidence base to inform future reviews of local plans and housing strategies. The research provides information about the current and future accommodation needs of Gypsies and Travellers, together with the needs of Travelling Showpeople, as well as providing information about additional support needs.

3.6 The overall objectives of the GTAA are as follows:

- to produce a County wide GTAA with specific recommendations for each district, having regard to the 20 housing market areas dispersed across the county;
- to understand the current accommodation circumstances of Gypsies and Travellers and Travelling Showpeople living in the six districts and the area of the Lake District National Park Authority;
- to provide a clear and robust understanding of the permanent, transit and other accommodation needs of Gypsies, Travellers and Travelling Showpeople;
- to produce an assessment of the mobility patterns and the drivers of mobility within the communities;
- to establish a clear baseline for existing provision;
- to make recommendations for each district on the level of future pitch provision to 2031 across Cumbria with data provided for each authority to 2031, having regard to the current local plan period for each authority;
- to provide an understanding of the demographic profile of the Gypsy and Traveller community, household formation, routes into accommodation and wider support needs;
- to provide best practice advice around key issues to be considered when preparing policies for the provision of sites and accommodation for Gypsies and Travellers and Travelling Showpeople.

3.7 Of all the districts Carlisle has the biggest provision in terms of sites for gypsies and travellers. There is also a significant level of provision for travelling showpeople.

3.8 Outcomes: agreed that updated evidence was required and that this should be undertaken on a county wide basis. County wide GTAA produced Nov 2013. Agreed that no LPAs had significant issues with unauthorised encampments. Dumfries and Galloway currently have no further need for Gypsy and Traveller Sites. All adjoining LPAs including Northumberland agreed that they could meet identified need for Gypsies and Travellers within their own boundaries.

Cumbria Biodiversity Data Network

3.9 This is a partnership that compiles and uses biodiversity data. The partnership comprises Tullie House Museum, Development Plan Officers Group, Development Management Officers Group, Natural England, the Environment Agency, Cumbria Naturalists Union, Cumbria Wildlife Trust and Cumbria Bird Group. The Network has assisted in the establishment of the Cumbria Biodiversity Data Centre which acts as the Local Records Office.

4.0 Scotland - Dumfries and Galloway Council:

4.1 The Local Plan area adjoins Dumfries and Galloway Council area to the north across the national boundary between England and Scotland. Whilst Scotland does not have its own equivalent of the duty to cooperate requirement, the Town and Country Planning (Local Planning) (England) Regulations 2012 state that where a local planning authority's area is adjacent to Scotland, the local plan should have regard to the National Planning Framework for Scotland.

4.2 In Scotland, the emerging spatial planning framework comprises the following:

- National Planning Framework 3: A Plan for Scotland, which sets out a long term vision for the development of Scotland, and is the spatial expression of the Scottish Government's economic strategy. The focus is on supporting sustainable economic growth and the transition to a low carbon economy. The Framework sets out the ambition for Scotland as a whole, and highlights the distinctive opportunities for sustainable economic growth in cities and towns, and in the rural areas and the coast;
- the South East Scotland Strategic Development Plan (SESplan) and accompanying supplementary guidance Housing Land: consultation draft. The area covered by the SESplan borders the very northernmost part of Carlisle District adjacent to Kershope Forest;
- Dumfries and Galloway Local Development Plan, adopted September 2014.

4.3 A number of meetings have been held with officers from Dumfries and Galloway Council, both between the two Councils, and as part of a wider forum of all neighbouring LPAs. Despite the lack of an equivalent duty in Scotland, officers saw the value of undertaking the process on an ongoing basis. Discussions have centred around wind energy developments, the Solway Firth AONB, and the Scottish Regional and National Scenic Areas, town centre retail, housing growth and the Hadrian's Wall World Heritage Site.

4.4 Outcomes: no strategic issues, which would necessitate planning policy to address such issues, were identified arising out of these discussions. However both Councils have ongoing commitment to engage in each other Local Plan process, and any other planning policy documents as may arise in the future.

5.0 Borderlands Initiative

5.1 There are historic examples of cooperation between the local authorities either side of the border between Scotland and England, and also across the county border into Northumberland. Building on this, the Borderland Initiative has recognised the recent opportunities arising from further devolution across the UK and Scotland, emphasising the strategic importance of this area. The initiative is a key driver in working towards a unified voice in joint lobbying of both respective governments.

5.2 Carlisle City Council is one of five local authorities involved in the Borderlands Initiative which includes Cumbria County Council, Dumfries and Galloway Council, Northumberland County Council and Scottish Borders Council as well as representatives from the Association of North East Councils. The Initiative acknowledges that there are common economic challenges experienced in the areas adjacent to the Anglo/Scottish border and therefore recognises that there are opportunities for working together, along with officials of the Scottish and UK Governments, to examine and exploit the enormous, as yet unrealised, potential of this area. The Borderlands Initiative recognises the commonalities of the area and is working to promote:

- The right conditions for economic growth;
- The competitiveness of its businesses;
- Added value in its key economic sectors;
- Inward Investment;
- Opportunities for our young people; and
- The right skills for our economy.

5.3 To date there have been two Summits of the Borderlands Initiative, (April & November 2014) involving Leaders and Chief Executives of all local authorities involved who have demonstrated a political will to take this work forward. There have also been a number of meetings of the Officer Working Group where background research has been compiled in relation to opportunities for cooperation. This work will continue into 2015, taking forward key opportunities that have been identified for tourism; energy; forestry; education and training as well as connectivity in relation to improved transport and communications links.

5.4 At the second Summit in November 2014 a political consensus emerged that the partners should work together to produce a single collaborative strategy to maximise cross border opportunities and address common challenges, achieve economies of scale and scope in the delivery of strategic projects and services, and speak with a collective voice to Governments in Edinburgh and London. Such an approach would build on the economic development, transport and associated strategies of the five Border's local authorities and would be linked to the major infrastructure plans and programmes of related public agencies.

5.5 Several key elements of the approach were identified at the Summit, in particular it was felt that there were strategic economic and transport corridors in the Borderlands that could provide the building blocks for both local development but also enhanced connectivity to wider national and international markets. Borderlands as a location was seen as having unique advantages at the cross roads between Northern Ireland, the Republic of Ireland, Scotland, Northern England and the Continent which could be maximised with a collaborative long term strategy bringing together the investment and economic development plans of the key local authorities and other public agencies. Potential development would include not only additional investment in road and rail networks but also air and sea transport and the further development of digital communications.

5.6 In terms of industrial sectors, three were identified as of strategic importance which would yield early returns if incorporated into the Borderlands strategy. Tourism, for example, an important industry in the Borderlands and was seen as having growth potential. Another key sector in the Borderlands is forestry which contains the largest most productive and fastest growing forests and woodlands in the UK. It also provides significant tourism opportunities. The third sector, energy, presents the potential of building on existing work on renewables for onshore and offshore wind energy production as well as tidal hydro-electric and biomass opportunities and the possibilities of nuclear power.

5.7 A key feature of a Borderlands Strategy and of the Borderlands initiative into the future will be to encourage the banding of national programmes so they match the requirements of local areas and strategic priorities.

5.8 Whilst the work of the Borderlands initiative has not directly influenced the content of the Carlisle District Local Plan, the key priorities of the Borderlands Initiative tie in with Policy SP2 – Strategic Growth and Distribution of the Local Plan in terms of recognising the need to maximise the economic benefits of Carlisle's highly accessible position in relation to key transport routes, M6 and West Coast Mainline.

6.0 Cooperation with other prescribed bodies

United Utilities

6.1 Whilst United Utilities is not a prescribed body for the purposes of section 33A(1)(c) of the Localism Act, the NPPF states at paragraph 180 that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers. Initial information exchanges were carried out in 2011 when the Council was undertaking a Core Strategy pre-NPPF. Since that time there have been a number of meetings, some jointly with the Environment Agency, to explore water supply, and waste water treatment and drainage infrastructure issues, both on a site by site basis, and where particular infrastructure capacity issues had been identified.

6.2 Fresh water supply within Carlisle District is from Castle Carrock reservoir and the River Eden at Cumwhinton, (both sites lie within the District). United Utilities has been kept informed of the scale of development anticipated to come forward in the Local Plan, both from allocated sites and through windfall. They have also been fully engaged in the Strategic Housing Land Availability Assessment (SHLAA) process, attending meetings in tandem with the Environment Agency and the Lead Local Flood Authority to give specific feedback regarding submitted sites.

6.3 United Utilities has advised that the level of development proposed in the Local Plan will result in a need for some localised reinforcement. This is a standard process and is not considered unusual. United Utilities has identified a need for additional assessment of new development proposals in Morton (south west Carlisle) to inform any potential infrastructure improvements. This assessment of development on the water supply infrastructure can be undertaken as and when proposals for development are formed. United Utilities has confirmed that it will continue to monitor the volume and rate at which development will come forward to better understand the impact and the need to coordinate any investment with the delivery of development.

6.4 Outcome - at the current time, and on the basis of the information currently available on development proposals, United Utilities has indicated that there are currently no concerns regarding the capacity of provision to the city and district, with an adequate supply available to meet the needs of residents and business. United Utilities would be best able to manage the impact of growth if it came forward gradually over the plan period. To this end housing allocations are projected to come forward over a 15 year timescale, with an annual average housing target. United Utilities will closely monitor the impact of development and the rate at which development comes forward. Developers are advised through the Planning Service to contact United Utilities for all development proposals to understand any network reinforcement that may be required as a result of development taking place.

6.5 Waste water treatment and the impact of this on waste water infrastructure will be fully assessed by United Utilities at the more detailed stage of a planning application,

especially in respect of surface water, with each case needing to be considered on its own individual merits and implications.

6.6 Notwithstanding the need for additional information to better understand the impact of development proposals, the City Council has engaged in meaningful discussion with United Utilities on the location of development and the evolution of development management policies in the preparation of the Local Plan.

6.7 The provisional assessments undertaken by United Utilities, based on the information currently available, have indicated that there are no issues with waste water treatment capacity within the urban area of the city. Recent investment of over £18 million has provided spare capacity within Carlisle treatment works. Outside of the city, however, there may be some localised capacity issues.

6.8 A provisional assessment has indicated that the District's main towns (Brampton and Longtown) have spare capacity at their respective works. The large village of Dalston also has limited spare capacity. Other smaller villages have recently seen improvements to their local treatment works, with Irthington benefiting from significant improvements in response to the anticipated approval of development at the Carlisle Airport.

6.9 However, some of the smaller treatment works in the rural area may be at or very near to capacity. In particular, an initial assessment of Wetheral and Great Corby wastewater infrastructure in the context of identified proposed growth (pending planning applications and Local Plan housing allocations) has identified that the wastewater infrastructure is near to capacity and there may be a need to coordinate the delivery of development with the delivery of infrastructure enhancements. United Utilities has therefore actively engaged with site promoters and the City Council with regards to the treatment of surface water run-off on these sites.

6.10 Outcome – UU has indicated that there are no concerns identified with the capacity at treatment works within the urban area of the city. There may be issues regarding the sewer pipe network, which may be too narrow at the edges of the city to carry the levels of waste water resulting from large new developments. Surface water flows are significantly higher than foul water flows and therefore surface water has a greater impact on the capacity of wastewater infrastructure, particularly during times of heavy rainfall / storms. In order to minimise the impact of development on wastewater infrastructure, United Utilities requests that developers / landowners thoroughly investigate the surface water hierarchy to minimise surface water entering the sewer network. Should surface water enter the wastewater network, which is always an absolute last resort, then United Utilities would expect this to be discharged at an appropriately attenuated rate (including an allowance for climate change) agreed with the sewerage undertaker.

6.11 Policy IP 6 makes provision for foul water drainage on development sites. Policy IP 6 is clear that development will not be permitted where inadequate foul water treatment and drainage infrastructure exists, or where such provision can not be made available. The policy also states that where UU can demonstrate that connection to the public sewerage system is not possible, alternative on site treatment methods and septic tanks associated with a new development will be permitted provided they are of an environmental standard to the satisfaction of the Environment Agency.

6.12 Policy CC 5 makes provision for surface water management and sustainable drainage systems. The policy aims to ensure that surface water is primarily managed at source, and then discharged according to four set priorities. The justification to the policy states that UU will continue to work with landowners and developers to limit the extent of surface water entering the sewerage system as a result of new development.

6.13 With regard to two specific housing allocations on the southern edge of Wetheral, there has been continual engagement through telephone calls and emails between United Utilities, Carlisle City Council and the three landowners. The discussions have placed particular emphasis on the importance of measures to deal with surface water, as early as possible in the process. These issues will continue to be considered in detail at pre-application discussions for future development sites. Developers are advised through the Planning Service to contact United Utilities for all development proposals to understand any network reinforcement that may be required as a result of development taking place. United Utilities has explained that it can most appropriately monitor and manage the impact of development on its infrastructure in Wetheral and Great Corby if it comes forward gradually over the plan period.

Environment Agency

6.14 The Environment Agency keeps detailed records on the location and type of flood defences within the district; they also record who has responsibility for each, be it EA themselves, a local authority or a private business or individual.

6.15 The Environment Agency has supplied data for the Local Plan Policies Map, in order to indicate flood risk zones. Part of the City benefits from flood defences, mainly along the banks of the main waterways. The areas benefiting most from the defences are located on the south banks of the River Eden and along both banks of the River Caldew where it flows through the city.

6.16 There are areas of the District that are not formally protected by flood defences, which continue to face considerable flood risk. However, the Local Plan does not allocate any sites for development within these areas, and has Policy concerning flood risk and development. During consultation on the Local Plan, the Environment Agency has indicated that they are investigating the catchments of Gosling Syke in Carlisle and Brampton Beck in Brampton to see what can be done to address flooding issues in these areas.

6.17 New development in the north of the city, particularly off Windsor Way will be located close to where EA are planning to create an attenuation pond at Gosling Syke. It could be argued that development here would directly benefit from this and enjoy a reduced risk of flooding.

6.18 Issues around surface water flooding also exist within the District. These tend to be highly localised. Regular meetings with the EA have resulted in advice that surface water flooding should largely be addressed through good planning – ensuring that development does not take place in areas prone to it, as well as ensuring that development doesn't exasperate surface water flooding problems else where.

6.19 Outcome: there are no major, strategic concerns about flood risk, or flood defence provision as most of the urban area within Carlisle now benefits from extensive flood defences. Flooding is now largely a local issue, and the Environment Agency continues to work with communities to identify those at risk from flooding and to explore options for bolstering defences. Where new defences are proposed, it is likely that developer contributions will be required to help the Environment Agency bring defence schemes forward.

6.20 Sufficient land is available within the District to meet development needs without having to allocate land for development within a flood zone. In response to the consultation on the Local Plan at preferred options stages 1 and 2, the EA has stated the following:

"We are very supportive of the work that you have done to understand flood risk within the Carlisle District and the positive approach you have taken to avoiding new development within areas at risk. We consider that you have a robust and credible evidence base in your Strategic Flood Risk Assessments".

"We note that the comments we made at preferred options stage 1 have been incorporated into the stage 2 documents, and have no specific further comments".

6.21 The EA specifically supported the development of a more ambitious green infrastructure policy, and suggested changes to the flood risk and development policy. As a result strategic Policy SP 8 Green and Blue Infrastructure, and Policy CC 4 Flood Risk and Development were refined with the advice and input of the EA. Dialogue with EA has continued throughout the Local Plan process, and not just during the various consultations periods.

6.22 In relation to a specific allocation, Site U 10, land off Windsor Way, is adjacent to an area where the EA are proposing to make a bid in their forward plan for a flood storage basin. This is to help alleviate existing flooding problems on a culvert behind Pennington Drive. A planning application has been received for the development of 277 dwellings on this allocated housing site, and the EA has been consulted as part of the

application process. In their response they have indicated that they are continuing to investigate the feasibility of constructing a flood storage basin on land upstream of the proposed development, and that they would seek external contributions wherever possible.

English Heritage

6.23 English Heritage is the Government's statutory advisor on the historic environment. They are an executive non-departmental public body sponsored by the Department for Culture, Media and Sport (DCMS). Their main role is to look after the national heritage collection of historic sites and monuments, which includes Hadrian's Wall.

6.24 English Heritage advises the government on which parts of the nation's heritage is nationally important, so that it can be protected by designation (which includes the listing of buildings), and also advises local authorities on managing changes to the most important parts of the nation's heritage. They also encourage investment in heritage at risk, provide grants, and share knowledge and skills with a wide range of bodies including local communities.

6.25 The Local Plan Policies Map shows the Hadrian's Wall World Heritage Site, the 19 conservation areas that have been designated within the District, and also the 166 Scheduled Ancient Monuments, two designated parks and gardens and one historic battlefield which lie within Carlisle District.

6.26 There has been active engagement between English Heritage and Carlisle City Council as the Local Plan has evolved from preferred options stage 1 and 2, to its current pre-submission draft stage. The nature of the engagement has included comments on individual policies and site allocations, a meeting in June 2014 to discuss the heritage aspects of the Local Plan, and ongoing emails covering the following:

- examples of model strategic heritage policies;
- guidance on the historic environment and SEA; and
- heritage impact assessments for those allocated housing sites where there was likely to be an issue with impact on local heritage assets.

Outcomes

6.27 In particular, throughout the Local Plan evolutionary process, English Heritage has advocated the inclusion of a strategic heritage policy in the Plan to reflect the NPPF requirement for plans to contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. Policy SP 7 – Valuing our Heritage and Cultural Identity sets out the Council's commitment to work proactively with partners where opportunities arise to preserve, protect and enhance the character, appearance, archaeological and historic value of heritage and cultural assets, as well as to better understand their significance.

6.28 In these regards the policy sets out a clear and important statement of intent with regards to both heritage and cultural considerations playing an integral part in local decision making.

6.29 English Heritage advised that the spatial portrait set out in the Plan should be strengthened to more explicitly acknowledge the heritage value of the historic core of the City, and the contribution this makes, acknowledge Carlisle's historic evolution and origins, and highlight the District's key heritage attributes and assets. To this end paragraph 2.33 of the Plan now covers this.

6.30 Through the site selection process for housing allocations, English Heritage advised that the City Council's Heritage Officer should have input in order to understand any potential adverse impacts on, or conversely positive opportunities with regards to, heritage assets owing to their proximity to the allocated site. It was agreed that these heritage assessments should be shared with English Heritage, together with Cumbria County Council's comments on archaeology and heritage, prior to the Plan being finalised.

6.31 The Carlisle Historic Quarter Steering Group, with a remit to establish a single integrated plan to maximise the economic and cultural benefits of the area, has endorsed the approach to heritage matters taken in the Local Plan. Membership includes representatives from Hadrian's Wall Heritage, English Heritage, the City Council, the University of Cumbria, Cumbria Vision and Carlisle Cathedral.

6.32 English Heritage has commented that:

"English Heritage's point of view is that Carlisle had consulted extensively on the Local Plan and had one of the best approaches to this process, especially in valuing heritage".

Natural England

6.33 Natural England is a non-departmental public body. They are the government's adviser on the natural environment, providing practical scientific advice on how to look after England's landscapes and wildlife. The stated statutory purpose of the body is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

6.34 Of relevance to local plan preparation, Natural England designate SSSIs, National Nature Reserves (NNRs), and work with landowners and managers to maintain SSSIs in favourable or recovering condition. They also provide advice on new local plans to help ensure that these enable appropriate future development that supports environmental resilience. They are also a statutory consultee under the Habitats Regulations with regards to the Habitats Regulations Assessment of the Local Plan.

6.35 The Local Plan Policies Map shows the extent of all Sites of Special Scientific Interest (SSSI) in the District, and indicates also the location and extent of European Sites, (Special Protection Areas and Special Areas of Conservation, (SPAs and SACs). The Policies Map also identifies County Wildlife Sites, which are areas of land recognised as being at least of county and sometimes national, importance for their nature conservation value. This is defined by the presence of important, distinctive and threatened habitats and species. The way that such sites are identified, selected, monitored and protected is through Cumbria Local Sites Partnership, which includes Natural England.

6.36 Natural England has engaged with the Local Plan consultation process, including the SA and HRA process. At the preferred options stage 1 consultation they suggested that the green infrastructure policies should be strengthened. They also welcomed the inclusion of the Policy GI 3 – Biodiversity and Geodiversity.

Outcomes

6.37 The development of strategic Policy SP 8 – Green and Blue Infrastructure, following consultation. At the heart of this policy is a presumption against the loss of any components of green infrastructure which fulfil, or have the potential to fulfil valuable functions unless the loss of such assets can be mitigated. The policy requires new development to be designed to maximise the benefits of green and blue infrastructure, affording careful consideration to how they can add to and integrate with existing spaces and the wider network.

6.38 The policy also requires consideration to be afforded to the functionality of such components, including for example, how they can equally assist with climate change adaptation through providing natural shading and urban cooling, or in creating valuable habitat to support and enable biodiversity to flourish or to improve ecological connectivity.

6.39 Throughout the development of the HRA there has been ongoing and helpful engagement with Natural England regarding the evolution of the document. This engagement has included regular email and telephone exchanges and advice on sources of information for detailed data on European sites, and technical information on air pollution. Overall Natural England has agreed with the methodology and conclusions reached at each stage of the HRA, (as it evolved alongside each stage of the Local Plan), with advice and issues raised as to which areas require further work and exploration. In particular, detailed advice and intervention was given as the HRA neared completion for the proposed submission draft version of the Local Plan.

“The approach and methodology used to scope the Habitats Regulation Assessment are acceptable to Natural England and are in line with the advice that would be offered by us”.

Civil Aviation Authority

6.40 Carlisle Airport lies within the District. The Civil Aviation Authority (CAA) is responsible for issuing the public aerodrome licence to the operator of the airport. It is the responsibility of the airport operator to ensure that safe operations are carried out in accordance with the conditions of the CAA Public Use Licence that the airport possesses. The CAA has provided a Carlisle Airport Safeguarding Map, which indicates where proposed development in the vicinity of the airport should be subject to consultation with the airport operator. It does not, however, place any responsibility on the Council for aviation safety either within or outside the airport boundary.

6.41 The Local Plan, through its evolution has shown a variety of safeguarding zones, including the Carlisle Airport safeguarding zone. However, as these zones are used at planning application validation stage, to inform the City Council of when consultation should be undertaken with particular bodies, they have been removed from the Plan, prior to the proposed submission draft version.

6.42 Policy IP 7 is specific to Carlisle Airport, and makes provision for development that is related to airport activities. The policy also allows enabling development that would facilitate the ongoing or further development that is essential or conducive to the operation of the airport, provided that there is clear provision of evidence to demonstrate how any such development is proportionate and relates to the ongoing viable operations of the airport.

The Homes and Communities Agency

6.43 The Homes and Communities Agency (HCA) mostly invest in building new homes, but also create employment floorspace and other community facilities. This includes funding both affordable and market homes for rent and sale. This helps increase local growth by creating jobs and supporting businesses.

6.44 The HCA owns public land, which is sold to house builders and others. They also regulate social housing providers (mostly housing associations) in England.

6.45 As part of the long term strategy of the Local Plan, a broad location for growth is identified on the key diagram, at a location known as Carlisle South. There has been ongoing cooperation between the City Council and the HCA Atlas team focusing on how best to support the planned strategic urban extension in this location. The Local Plan contains strategic Policy SP 3 – Broad Location for Growth: Carlisle South, which the HCA broadly support.

6.46 Discussions and meetings have therefore focussed on the following:

- engagement strategy - how to identify and meaningfully engage the appropriate land owners and stakeholders and how to seek to pitch aspirations at this preliminary level?

- vision and objectives - how to start to develop a shared and common vision and set of objectives to be clear about what we want to achieve and what we are therefore working towards? This would be informed by evidence as well as through engaging all those with a genuine interest;
- project plan - mapping out the key individual stages and milestones associated with progressing this project, making clear what is involved with and what the key objectives and therefore outputs of each stage would be. Thinking about the likely timescales of each stage and identifying the stages where ATLAS may be well placed to support us;
- business case - to be developed at the outset and later developed in tandem with the project plan, in order to map out what resources are likely to be required, particularly at the initial stages in order for example to start to properly project plan and actually develop the business case.

6.47 The City Council, in tandem with Cumbria County Council, made a successful bid to the HCA Local Capacity Fund to help support the infrastructure work associated with acting to masterplan and bring forward the broad location for growth. Further to discussion between officers of both Councils on the 2nd February 2015 it has been concluded that the allocation for 2014/15 should be prioritised to fund, in no particular order, the following essential studies:

1. Project management capacity with regards to the Carlisle Transport Improvement Study;
2. Carlisle South Southern Relief Road Indicative Route Modelling; and
3. Carlisle South Technical Due Diligence Assessment.

6.48 The Council has made a commitment to further proactive joint working with regards to better understanding the infrastructure necessary to enable growth and in subsequently acting to secure the investment to facilitate its delivery. Such working will extend to engagement in discussions with the HCA regarding milestones related to the release of the 2015/16 funding allocation. Atlas has now made a formal commitment to work with the Council giving guidance and advice on how to deliver Carlisle South.

6.49 Outcomes:

CCC Issue/Requirement	ATLAS Suggestions
Need for a statement to set out to landowners/developers a consistent position from CCC in terms of future planning and delivery of the sites	Internal officer and stakeholder workshops are useful in getting clarity on key issues that developers/landowners need to address. It will also be important to ensure that the relevant Local Plan policy wording is clear about how proposals should be brought forward and also what future masterplanning should resolve particularly in regard to strategic infrastructure requirements which affect multiple land ownerships.
Engagement strategy – to start to meaningfully engage with landowners and developers	Possible use of project boards/ MOUs with landowners/developer consortiums. Also use of PPAs/PPA Charters can be effective in managing emerging proposals.

Vision and Objectives for CCC to be clear on what it wants to achieve from the sites	Visioning and objective setting workshops are useful ways of developing the initial thinking beyond the high level CS or Local Plan policy wording and ahead of significant developer or landowner interest. They can be flexible enough to allow further planning and design to respond to unknown constraints and opportunities. Atlas examples include Carrington, Trafford – Visioning workshops.
Project planning – to define stages and milestones	Initial knowledge sharing sessions with stakeholders can help to start the project planning. Atlas examples include the DN7 project, Doncaster Knowledge Sharing Session
Business Case – to ensure sufficient resources to service the project.	Possibly look at business cases that have and are being prepared to justify bids for recent LEP and other public sector funding streams.

The Clinical Commissioning Group

6.50 The City Council has had positive ongoing discussions with health partners to establish what will potentially be required in terms of health infrastructure (doctors' surgeries/health centres/health care facilities), in order to determine what will be required in order to support the levels of development proposed within the Local Plan and within the Infrastructure Delivery Plan (IDP)

6.51 The IDP looks at what infrastructure may be required over the coming years to support the levels of development and growth within the Local Plan. Health provision is an integral part of this and may assist with future Community Infrastructure Levy charging schedules. The IDP looks at the following:

- what currently exists on the ground;
- what is needed to support development proposed in the Local Plan;
- the direction of responsibility for providing new health infrastructure;
- when that infrastructure can reasonably be expected to be in place and any phasing that may be associated with it;
- the likely costs associated with any new health infrastructure;
- sources of funding that will be used to meet these costs;
- any potential gaps in funding and how these will be addressed.

6.52 The Commissioning Manager for Carlisle Locality in Cumbria (Muriel Nixon) has a positive working relationship with Carlisle City and Carlisle Healthy City partners. In partnership, positive steps were taken to influence the Local Plan in regards to health, due to all of the partner input. This work has focused on what infrastructure will be needed in the future, including understanding what is potentially required in terms of health provision such as GP practices growth or capacity of health care facilities.

6.53 The **Carlisle Healthy City Steering Group (HCSG)** is responsible for Carlisle's development as a WHO Healthy City. The group also lead on improving health and reducing health inequalities throughout the district. Within this it develops a range of strategic actions and responses to address the wider determinants of health, which are

aligned to the core themes and requirements of the WHO Healthy City programme. This work is advanced through collaboration among partner agencies and communities, in order to deliver high quality services and improved health and wellbeing outcomes for the residents of Carlisle at a locality level.

6.54 The group have a specific remit of having an overview of local issues, providing a means of bringing together partnerships, and connecting with local communities to mobilise resources to impact on health and well-being. It also has a key role in ensuring that locality issues are represented at the Cumbria Health and Wellbeing Board and supporting groups.

6.55 Carlisle recently successfully achieved Phase VI World Health Organisation Healthy City Status and in doing so engaged with a much wider range of partners due to building on the work that took place in phase V. There are over 30 signatories ranging from: the Lead GP of the Carlisle Clinical Commissioning Group. Director of Public Health and the Chief Executive of Cumbria Partnership NHS Foundation Trust, to the Chair of Carlisle Parish Councils Association, Managing Director of Carlisle Leisure, Principal of Carlisle College and Executive Dean at the University of Cumbria, Police, County Council and City Council. The wide reaching membership assists in tackling the wider determinants of health.

6.56 A presentation on the preferred options Local Plan was given to the group in Spring 2013, outlining the remit of the Plan, and how to get involved.

Outcomes

6.57 Allocation of a site in Brampton for the development of a new medical centre, to meet the needs of Brampton Medical Practice. The current location has access problems for elderly and disabled patients, and is becoming too small for the expanding practice.

6.58 Development of strategic Policy SP 9 – Healthy and Thriving Communities, page 62 of the Local Plan.

Office of Rail Regulation

6.59 The Office of Rail Regulation (ORR) is an independent regulator, and operates within the framework set by UK and EU legislation. The ORR is accountable through Parliament and the courts. The ORR regulates the rail industry's health and safety performance, and hold Network Rail to account. They also make sure that the rail industry is competitive and fair.

6.60 The ORR work alongside rail infrastructure companies, the Government, other safety bodies and companies in the railway industry.

6.61 It is not considered that the Plan contains a strategic matter, as defined by the Localism Act, in relation to land, safety or operational rail transport matters.

Highways Agency

6.62 Discussions have been held on an ongoing basis with the Highways Agency (HA) to identify and understand any implications as a result of the proposals within the Local Plan. Officers have met with the HA to talk them through the Plan in more detail on Friday 27th June 2014. The HA have been kept fully briefed on the nature and progress of transport modelling undertaken in partnership between Cumbria County Council (as Highways Authority) and Carlisle City Council, and had sight of the modelling output reports. The HA have similarly kept the Council informed of any evidence studies of relevance from their perspective, including their route based strategy phase one reports where of relevance. The Agency commented at their meeting of the 27th June that they have no major issues with what is being proposed by the Plan and that they were happy with the approach to future working and cooperation.

Marine Management Organisation

6.63 As the marine planning authority for England the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As such there is an overlap with local plans, and it is therefore the duty of the MMO to take all reasonable steps to ensure compatibility with local plans which apply down to the low water mark.

6.64 As such the MMO through the consultation, sought to identify the 'marine relevance' of applicable plan policies. As there is no marine plan in place for the North West, local planning authorities are referred to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river.

6.65 The MMO were invited to comment on the Local Plan at both Preferred Options stage, but, having reviewed the Plan and had no specific comments to make drew our attention to the remit of the organisation.

7.0 Cumbria Local Enterprise Partnership, and Local Nature Partnerships

7.1 Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) are not subject to the requirements of the duty. However, the National Planning Policy Framework and National Planning Practice Guidance states that LPAs must cooperate with LEPs and LNPs and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to Local Plans.

7.2 The Cumbria Local Enterprise Partnership (LEP) is the strategic economic development organisation for Cumbria. The LEP's role and function is to provide a strategic lead in all activities contributing to the growth and vibrancy of the county's economy and, where appropriate, take positive action, using skills, capabilities and networks of the LEP partners. The partnership is made up of representatives drawn from the County's business organisations and public sector organisations.

Outcomes

7.3 The table at Appendix 2 shows how the proposed submission draft of the Carlisle District Local Plan 2015 – 2030 supports and aligns with the key aims and objectives of the Strategic Economic Plan (SEP) of the LEP. The Technical Officers Group (TOG), (made up of officer representatives, the University of Cumbria, Cumbria Tourism and the Environment Agency) and which advises the LEP board, and provides public sector support to the delivery of the SEP, have endorsed this alignment of objectives between the two plans.

7.4 Local Nature Partnerships (LNPs) were set up following a government initiative to encourage a wider range of people to be involved in how decisions are made about the natural environment in their local area. In 2012 Defra gave a small amount of funding to help develop 47 LNPs across the country.

7.5 Within Carlisle District there are two established LNPs, the Northern Upland Chain and the Cumbria LNP. Both LNPs were set up with the following objectives:

1. Develop funding bids to support landscape-scale projects
2. Coordinate and streamline existing activities through sharing best practice
3. Raise awareness about the health benefits and value of the natural environment to communities and the local economy

7.6 During the early stages of the LNPs, workshops were held with invited representatives from key organisations, including Carlisle City Council. Participants included those with a connection with the LNP area through business or work; those who were interested in how decisions are made that affect the natural environment in the LNP; those interested in how the natural environment and the local

economy are linked; and those interested in the link between the natural environment and health.

7.7 Carlisle City Council has actively supported the effective partnership working that has been brought about through the establishment of a Northern Upland Chain and the Cumbria LNP, through attending workshops and meetings, and seeking out ways that the LNP could become involved in Local Plan making.

7.8 In particular we have encouraged the opportunities that have been brought to a landscape scale approach to managing the natural environment. Carlisle City Council supports the continued development and exploration of plans and ways of working together to develop joint funding bids, projects and best practice that can be delivered through the LNPs.

Outcomes

7.9 Directing applicants to the LNP when considering S106 requirements where appropriate. Being an active member of the Cumbria Biodiversity Data Centre steering group, in partnership with the LNPs and the Cumbria Wildlife Trust.



8.0 Internal collaboration

8.1 Although not strictly covered by the terms of the duty to cooperate requirement, this section of the report includes reference to an internal working group to show the scope of collaboration that has taken place throughout the evolution of the Local Plan.

8.2 The Local Plan has been informed throughout its development by a Local Plan Members' Working Group. This is a cross political party group, the purpose of which is to steer plan preparation through regular review of the key stages of the Plan's production. With regards to the latest version of the Plan, the proposed submission draft, the working group has acted to review the Plan's revised vision and objectives, a number of new and revised strategic policies, and the proposed land use allocations proposed for inclusion within the Plan.

8.3 The working group has also reviewed key pieces of evidence, including the Strategic Housing Market Assessment update (2014), the Strategic Housing Land Availability Assessment update (2014), Gypsy and Traveller Accommodation Assessment, City Centre Development Framework and the Local Plan Viability Study, together with other linked documents including the Local Development Scheme and the Authority Monitoring Report.

8.4 Under the terms of reference of the group the work stream is to look at detailed draft planning policies, draft technical reports and other information supporting these policies, different types of consultation for the draft Plan, to receive reports covering the outcome of public consultation, and to steer the timetable for the preparation of the Plan. The working group has proved successful in adding considerable value to the Local Plan as it has emerged.

8.5 Internal consultation and collaboration has also taken place on an ongoing and regular basis with relevant departments within the Council. In particular Housing Services has informed the affordable housing policy, and the Green Spaces team has informed the policies that seek to make provision for public open space or green infrastructure. The Development Management team has also had an ongoing input into policy application in the field of development management, and helped to positively word many of the more detailed development management policies.

Appendix 1 – Meeting template

Duty to co-operate meeting

Allerdale Borough Council 01/10/12

Purpose of meeting

The Localism Act 2011 Section 110 sets out a '**duty to co-operate**'. This applies to all local planning authorities, national park authorities and county councils in England – and to a number of other public bodies. The duty:

- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
- requires that councils set out planning policies to address such issues
- requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
- requires councils to consider joint approaches to plan making.

Paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate.

Common strategic issues identified

- Hadrian's Wall WHS – crosses Northumberland, Carlisle District, Allerdale and Copeland. Potential for common policy with text agreed by Judith Nelson (English Heritage); **Action** – send Carlisle draft policy to Julie Ward and liaise with Northumberland, including check status of Northumberland plan;
- Solway Coast AONB – partnership working already in place through AONB unit. However, potential to have common policy, (this also applies to North Pennines AONB);
- strategic housing sites – discussion around whether each district could meet its housing need. Whilst this unlikely to be an issue, we discussed Wigton as a KSC in the north of Allerdale, and issues arising from this. An issue that was identified was capacity of secondary school in Wigton, and any large housing allocations to west of Carlisle may generate children who choose to go to Wigton School rather than secondary schools in Carlisle (quality and standard issue – together with parental choice); **Action** – set up meeting with Andy Smart (Education Authority), Michael Barry (CuCC), and County Highways;
- Carlisle is a sub regional centre for retail – discussion around hinterland for retail and potential impacts on Wigton. Wigton considered to meet specific local needs through small independent shops. **Action** – send draft retail study to Julie Ward;
- Northumberland Foundation Health Trust to take over Cumbria Foundation Health Trust next May. One type of operation in one hospital. Implications for travel patterns. **Action** – arrange contact and research any Health Authority draft plans;

- University - The University of Cumbria has facilities within the Energus building at Lillyhall, in Workington, West Cumbria, offering a flexible learning space for all University of Cumbria students. When University responded to Carlisle Issues and Options, they referred to a draft masterplan, and the need to tie in with our Local Plan. **Action** – arrange university contact;
- Travellers – Allerdale and Carlisle both agreed that updated evidence is required as the county wide 2008 GTAA is becoming out of date. The preferred course of action would be a county wide approach again, although the support for this is unknown. **Action** – speak to Michael Barry at CuCC to check progress/support. If timescales not compatible, go for joint Carlisle/Allerdale study, and renegotiate quote from Salford;
- Thurstonfield/Kirkbampton – straddle boundary of districts. Issues may not be strategic, but may be local issues with waste water treatment work capacity;
- renewables – Allerdale considers that high percentage of wind turbines have been permitted and in operation within district. By comparison, Carlisle has seen little wind turbine development, possibly as our windiest areas are constrained by RAF Spadeadam requirements, and Eskdalemuir seismic testing station. Also AONB constraints;
- energy coast, Grid PPA – this area needs further discussion. **Action** – Jilly to discuss with Chris Hardman;
- potential for Duty to Cooperate to be referenced in spatial portrait and map.

Appendix 2 – alignment of Local Plan with LEP priorities

ANTICIPATED OUTCOMES FROM DELIVERING SEP PRIORITIES	HOW SUPPORTED THROUGH CARLISLE DISTRICT LOCAL PLAN
Create 15,000 additional full-time equivalent jobs.	Strategic Policy SP 2 makes provision for strategic growth and distribution by ensuring that sufficient employment and housing land is identified to create the right conditions for economic growth. The focus for development is the urban area of Carlisle and the M6 corridor, however, in the rural area, development opportunities will be harnessed where they will contribute positively to increasing the prosperity of the rural economy.
Boost Cumbria's economy by £600m more than current predictions through targeted investment in key projects.	
Increase the county's GVA growth by 0.6 percentage points above current forecasts, yielding a growth rate of 2.2% during the plan period.	
Support the local planning authorities to deliver 30,000 new homes through their Local Plans	Strategic Policy SP2 (land identified for 565 new homes per year) and Policy HO 1 specific housing allocations in the urban and rural areas.
Raise skill levels through working with local education and training providers, reducing the proportion of Cumbria's firms facing a skills gap by 3%	The objective for the economy is: "foster the right conditions to stimulate inward investment through ... strengthening and expanding the skills base available..."
Increase visitor expenditure by over £500m	Strategic Policy SP7 aims to pursue opportunities to aid the promotion, enjoyment, understanding and interpretation of heritage and cultural assets. Policy EC9 recognises the vital importance of the tourism, arts, leisure and cultural sectors and makes provision for their development to support the economy of the area.
Achieve 100% coverage of superfast broadband	Policy IP4 requires new development to demonstrate how it will contribute to and be compatible with local fibre or internet connectivity, and to enable a connection to the internet with a min speed of 10Mbps, aspiring towards 25Mbps where possible.
Strategic SEP Priority Themes	
Nuclear and Energy Excellence – Key Activities	
Energy excellence – delivering Cumbria's renewable energy potential	Policy CC1 and Policy CC2 make positive provision for renewable energy from the wind and from other sources, provided that any associated impacts are, or can be made acceptable.

Improvements to coastal railway and sustainable transport to maximise potential and capacity.	Policy SP 5 aims to makes provision for strategic connectivity of all forms of transport including sustainable forms, for not only improved provision, but improved connections.
Investment in priority employment sites to secure business expansion opportunities and to attract private sector investment.	Whilst the Local Plan does not provide investment, Policy SP 2 Strategic Growth ensures that sufficient land will be identified to create the right conditions for economic growth. In addition this policy support development of the former MOD Longtown site
Developments at the Port of Workington	Policy SP 5 Strategic Connectivity aims to secure a modal shift in the transport of freight from road to rail and improve connections with the Port of Workington.
Vibrant rural and visitor economy	
Investments in destinations and attractions so Cumbria can compete on an international stage	Policy EC4 allows for the development of new tourism facilities
Delivering sustainable transport infrastructure and interventions, making it easier for visitors to arrive and move between destinations	Policy SP 5 Strategic Connectivity supports improvements to the transport network, in partnership with delivery partners and operators, in order to support the District's growth aspirations and the role of Carlisle as a strategic transport hub.
Significantly raising the international awareness, appeal and identity of Cumbria by hosting major, world class events	No specific policy, however, the Local Plan references current work under the 'Sense of Place' banner aims to attract people to visit and live in the area, encourage those here already to stay, persuade investors and developers to see us as a place worth investing in and create and attract new jobs whilst keeping the ones we have.
Increase international visitors through a combination of international marketing and working with main transport infrastructure providers	Policy HE 1 acknowledges that Hadrian's Wall is an internationally known icon of the north of England and a unique part of the District's identity. It has significant historical and archaeological value as well as being important from recreation, social and economic perspectives. The associated Hadrian's Wall Path National Trail and the Hadrian's Cycleway also provide significant access opportunities for large numbers of cyclists and walkers, drawn from local, national and international communities.
Developing home-grown talent in hospitality and leadership skills through dedicated quality training	Policy SP 10 sets out a commitment that the City Council will work with partners to develop skilled communities in order to

	underpin future economic growth.
New and improved rural employment sites and managed workspace	<p>Strategic Policy SP 2 makes provision for strategic growth and distribution. In particular it references potential for the redevelopment of the redundant parts of the MOD Longtown site, which lies within the M6 corridor and has good road and rail connections. It also recognises that within the rural villages, development opportunities of an appropriate scale and nature will be harnessed to positively contribute to increasing the prosperity of the rural economy and enable rural communities to thrive.</p> <p>Policy EC 11 makes provision for rural diversification to increase the range of sustainable economic activities undertaken in rural areas.</p>
Provide affordable housing	Policy HO 4 seeks affordable housing provision at different thresholds within 3 viability zones across the district.
Comprehensive superfast broadband, 4G mobile network and open WiFi networks	Policy IP 4 requires that new development must be able to demonstrate how it will contribute to, and be compatible with, local fibre or internet connectivity. The policy references minimum internet speeds, and aspirational faster speeds. Development proposals are also encouraged to engage with local broadband groups to explore how superfast broadband can be provided to benefit the local community.
Focus on the management of water	<p>Strategic Policy SP8 seeks to protect green and blue infrastructure. In particular it aims to afford the highest level of protection to the Rivers Eden, Caldew and Petteril. Blue infrastructure refers to the aquatic and hydrological networks such as rivers and tarns.</p> <p>Policy IP 6 makes provision for the correct management of foul water drainage on development sites. In particular it prevents development from taking place where there is inadequate foul water treatment and drainage infrastructure, or where such provision cannot be made available.</p> <p>Policy CC 4 addresses flood risk and development, whilst Policy CC 5 ensures adequate management of surface water and use of SUDs.</p>
Maintain and broaden the rural and agricultural skills base	The objective for the economy in the Local Plan states: foster the right conditions to

	<p>stimulate inward investment through increasing the working age population; strengthening and expanding the skills base available, diversifying the economy and improving enabling physical infrastructure. Policy SP 10 sets out a commitment that the City Council will work with partners to develop skilled communities in order to underpin future economic growth.</p>
Strategic connectivity of the M6 corridor	
<p>Carlisle infrastructure and junction improvements programme to enable delivery of 6,300 new homes</p>	<p>The M6 runs through the district linking the Carlisle to SW Scotland, NW England and beyond. Carlisle benefits from 4 motorway junctions. Policy SP 5 Strategic Connectivity promotes economic growth and seeks to attract new and growing investment along the M6 corridor. In addition the policy sets out an aspiration to develop a southern relief road linking junction 42 of the M6 with the southern end of the A689 as part of developing the broad location of Carlisle South.</p>
<p>Increasing the presence of University of Cumbria in Carlisle</p>	<p>Strategic Policy SP 10 Supporting Skilled Communities sets out the Council's commitment to support developments which relate to the operational needs and/or expansion of all the District's higher, further and specialist education establishments including the University of Cumbria.</p>
<p>Improving facilities at and around Carlisle Station</p>	<p>Policy SP 5 Strategic Connectivity sets out that opportunities will be taken to improve and modernise key public transport infrastructure including Carlisle Railway Station.</p> <p>Policy SP 4 also seeks to highlight the opportunity that exists in the locality of the Citadel to reuse and redevelop land and buildings to further improve the sense of arrival for visitors using this important historic and iconic gateway.</p>
<p>Improving leisure and cultural facilities in town centres</p>	<p>Strategic Policy SP 4 Carlisle City Centre aims to maintain and enhance the status of Carlisle City Centre as the principal focus for main town centre uses including leisure. Policy EC 9 Arts, Culture, Tourism and Leisure Development recognises that these are main town centre uses and as such the Council will encourage this type of development within the city centre, district or local centres.</p>

<p>Investing in colleges to increase participation and to attract and retain young people in the county</p>	<p>Strategic Policy SP 10 Supporting Skilled Communities sets out the Council's commitment to support developments which relate to the operational needs and/or expansion of all the District's higher, further and specialist education establishments including the University of Cumbria. Policy SP 10 also sets out a commitment that the City Council will work with partners to develop skilled communities in order to underpin future economic growth.</p>
<p>Sustainable transport Access and Connectivity improvements</p>	<p>Policy SP 5 Strategic Connectivity states that opportunities will be taken to increase the provision for cycling and walking, including improved connectivity across the District; retain and enhance existing public transport services and to improve and modernise key public transport infrastructure including Carlisle railway station; secure a modal shift in the transport of freight from road to rail; protect the lines of disused railways which have the potential for future use as green corridors for walking and cycling, or to facilitate the reinstatement of public transport services.</p>