

# **Carlisle District Local Plan Examination**

Matters, Issues and Questions (MIQs)

## **Matter 6:**

Infrastructure Provision

## **Statement by Carlisle City Council**

November 2015



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***Question 1: Is the Infrastructure Delivery Plan realistic in assessing the timescales that infrastructure will come forward over the plan period?***

**1.1** The Infrastructure Delivery Plan (IDP) [EL1.004b] has been developed in continual stages alongside the preparation of the Plan, with infrastructure providers engaged throughout. This pragmatic approach to the production of the IDP has enabled the frontloading of infrastructure discussions and the flexible nature of the document to have responded quickly to new information received as the Plan has continued to evolve.

**1.2** While there are infrastructure needs arising from the development proposed within the Plan, the Council are satisfied that with the use of appropriate developer contributions (e.g. S106, S278 and CIL) this infrastructure can be brought forward when required. Supported by the Council's commitment to working with them, and to secure necessary developer contributions, infrastructure providers have not objected to the levels of development or to any of the proposed allocations in the Plan on infrastructure grounds nor have they sought phasing of development through the use of Local Plan policy.

**1.3** Detailed timescales for the delivery of infrastructure have been included in the IDP where they have been made available to the Council. Where these timescales have been presented, they have come directly from various infrastructure providers, with significant input from Cumbria County Council who have been proactively involved in advising the City Council on infrastructure matters not least given their responsibilities with regards to education, transport, public health and flooding.

**1.4** In some circumstances the process of the IDP has identified a need to keep emerging development pressures on key infrastructure under review, as opposed to identifying specific mitigation measures and delivery timescales now. This is particularly true with respect to the Strategic Road Network (SRN) which has been identified through transport modelling to potentially require mitigation within the life of the Plan, including potential improvements to Junctions 42, 43 and 44 of the M6, and on the A69 (where joint working on the outcomes of the current DfT study may be necessary). However, such pressures are not anticipated until the latter years of the Plan. It has been agreed with Highways England that the most appropriate action is for the Council

to formally commit to a continued, mutually-agreed, assessment of the emerging impacts on the strategic road network. The Council, Cumbria County Council and Highways England will agree an approach covering transport assessment methods and procedures for future joint working. This approach should ensure that additional specific modelling and identification of necessary mitigation measures is undertaken as soon as a future need is identified, to enable the timely delivery of critical interventions on the SRN in advance of when they will be required.

**1.5** The infrastructure implications of Carlisle South, a broad location identified to accommodate future growth through Policy SP3 within the Plan, are considered in the Council's response to Matter 2, Issue 2, Question 5(c).

**1.6** In all cases, and through recognition that infrastructure planning is an ongoing process, the Council will continue to engage with providers regarding appropriate delivery strategies. The process of the Annual Monitoring Report, drawing on the findings of ongoing work to maintain the IDP as up to date, will be used to report on the progress of delivery and to communicate the conclusions of ongoing reviews including flagging the actual or likely commencement of any further specific work deemed necessary, including CIL.

***Question 2: Is Policy IP 2 consistent with paragraph 32 of the National Planning Policy Framework in so far as the policy states that “development that causes significant issues that cannot be mitigated against will be resisted” which is a lower threshold than severe harm referred to in paragraph 32?***

**1.7** The Council accepts that the wording referred to should be changed to ensure the policy is in greater conformity with the NPPF. The Council proposes the following modification to the Plan:

Amend second sentence of first paragraph of policy IP2 as follows “Development that will cause ~~significant issues~~ **severe harm** that cannot be mitigated against will be resisted.”

**Question 3: Will a Supplementary Planning Document that sets minimum parking standards for the district (a) be setting out policy that should be included in the Local Plan? (b) be justified; (c) be consistent with national policy?**

**1.8** Cumbria County Council, in its capacity as the highway authority, set out parking standards in *The Parking Guidelines for Cumbria* (1997). The need for a review of this document has however been recognised and planned for some time, including over the course of the production of the Plan. It is also material to note that over the past 12 months (although it was known for some time prior to this) responsibilities for on-street parking have been going through the process of being transferred from the City Council to the County Council, and a review of the City Council's own car parks and charging has also been ongoing. The implication of these circumstances is that the appropriate certainty was not considered to be in place to progress detailed parking standards as part of the Plan process.

**1.9** Over the coming months the County Council will be finalising its *Cumbria Design Framework*. This document will set out the principles to guide design around highways and drainage as per the County Council's responsibilities for these areas. It is intended that this framework will incorporate new parking guidelines, within which the City Council can then act to develop appropriate detailed local standards.

**1.10** Notwithstanding the above the proposed policy as it currently stands establishes the principle of requiring minimum standards for car parking in new development. This is a change from the previous Plan, which required maximum standards, and has been introduced after consultation with the Council's own Car Parking team highlighted issues with inadequate parking provision within new development resulting from the restrictive, maximum standard approach. The introduction of minimum standards has largely been supported by Cumbria County Council in their capacity as the Highways Authority and can be seen to be wholly in keeping with the Framework which removes the requirement for local planning authorities to impose maximum parking standards.

**1.11** The approach of deferring standards to an SPD is one that has been employed by a number of authorities across the country within adopted core strategies and local plans, with examples including Birmingham, Southampton, Warrington and Winchester. Within Cumbria, other districts have also adopted similar approaches, with none of the

adopted local plans/core strategies containing detailed parking standards – Copeland Borough Council’s 2013 adopted plan in particular establishes the intention to produce a parking strategy, after plan adoption to set out updated parking standards. This approach has been found to be sound.

**1.12** Consequently, given the local circumstances outlined above, the approach taken by Policy IP 3 is considered appropriate, justified and in accordance with the principles of the NPPF.