Appendix A:

Detailed Cumbria County Council Comments with respect to Draft City Centre Development Framework

**Role of Document**

1. It is understood that the role of the City Centre Development Framework will be to identify achievable uses for key sites within Carlisle City Centre. Through this process, there is an opportunity to identify land for the 18,700 sq. m. of modern comparison retail floorspace the need for which was identified in the 2012 Carlisle Retail Study.

2. It is appreciated that should the City Council fail to identify deliverable retail floorspace in the City Centre, there would be a risk that such proposals may be delivered elsewhere, potentially in less sustainable out of centre locations.

3. It is understood that the sites identified in the City Centre Development Framework would be translated into Local Plan allocations.

4. At this stage the Infrastructure Delivery Plan needed to support the Local Plan has yet to be developed, therefore the transport impact of different development proposals are still to be fully assessed. It is naturally considered important that development proposals are robustly tested and to achieve this, the County Council will support the City Council in the development of an Infrastructure Delivery Plan which will help inform the Carlisle Local Plan. Related to this, it is considered essential that to deliver development in a sustainable manner, the role of developer contributions (CIL, S106 and S278) should be maximised.

5. Set out below are comments concerning specific elements of the Draft City Centre Framework:

**Carlisle Retail Study**

6. The Carlisle Retail Study 2012 underpins the retail floorspace requirements for the City. Paragraphs 158, 160 and 161 of the NPPF make clear the importance of Local Plans being based on up to date evidence. Given its age and importance to the planning strategy for the City Centre, it is recommended that this document should be subject to a refresh and review to reflect latest economic and population evidence for Carlisle.

**Economic Development Strategy**

7. While it is agreed that most of the strategy relevant to Carlisle has been identified, the heading on page 17 should be Cumbria Local Enterprise Partnership Strategic Economic Plan; and not “Business Plan” (para 5.10).

8. References to the public realm strategy should recognise the highway de-cluttering work that the County Council are progressing in conjunction with the City Council. This work will complement the signing strategy.
Character Area Analysis and Option Development and Preferred Option

9. When considered on the whole, the County Council has concerns about the potential effects of locating such a large quantum of retail floorspace at a single site at Rickergate. There are concerns that this may be prejudicial to the overall balance of commercial development across the City Centre and thereby, adversely affect the ability to deliver other regeneration priorities around the key gateway of Carlisle Station and Botchergate. Paragraph 23 of the NPPF requires that planning looks to “promote competitive town centre that promote customer choice and a diverse retail offer which reflects the individuality of town centres” and we would wish to see the development pattern across the city to better reflect this important principle.

10. The County Council recognise the proposed strategy for each character area does not consider the transport implications of the proposals within them. It is therefore recommended that following the completion of the Infrastructure Delivery Plan, the strategy for each area is then reviewed.

11. It also is considered important that the design of new development in the City Centre is carefully considered to ensure good quality schemes emerge.

Courts/Citadel

12. This priority location is extremely important to maintaining the balance development across Carlisle. In particular, the coming vacation of The Courts by the County Council creates an opportunity to deliver significant new investment which would bring strategic benefit given that development here could act as a catalyst for positive change linked to improvements at the strategic gateway of Carlisle Station and the regeneration aspirations for Botchergate. In this context it is worth noting the high priority given to Carlisle Station with the Cumbria Strategic Economic Plan. This highlights the need for future investments that improve; “facilities at, and around, Carlisle Station as the principal point of arrival in the heart of Carlisle”. For these reasons the delivery of new development in the area of the Courts/Citadel and Carlisle Station should be a key priority within the City Centre Development Framework.

13. It is considered that the delivery of transformative development at this site should help preserve the overall vitality of Carlisle City Centre by providing an opportunity for a landmark development that can help maintain the southern end of the City Centre and the existing retail function within it. Despite this, the Development Framework would appear overly pessimistic about the ability of the Courts/Citadel and land facing English Street to accommodate the full range of uses that may form part of a comprehensive mixed use development at this site. This may have the effect of fettering future options, opportunities and aspirations to allow this site to come forward in a viable format in response to the prevailing market conditions.

14. It is considered essential that the Framework promotes a more visionary approach that reflects the potential for comprehensive development across
this site. Therefore the Framework needs to set out the potential for a mix of uses at this site including; leisure, retail, cultural, office, car parking and educational uses. Linked to this, within the Framework; reference to “The Courts” being a “backland” location should be removed, given this site enjoys important frontages to English Street, Court Square Brow and Borough Street where there is significant footfall, especially going to and from the Station.

15. With respect to the highways and transport issues we note the reference to opportunities for enhanced transport interchange at Station Square. This reference should be removed as there will be a range of possible options to deliver improved accessibility to Carlisle Station. Reflecting this particular issue, there should be additional point in the proposed strategy; “to review and improve station car parking access and drop off provision”.

16. Other factual issues include the incorrect reference to Court Square as station square. In Figure 4 the depiction of the public baths site is not correct, as the site shown is a combination of public baths and Network Rail car park. In paragraph 12.12 references to land ownership are not correct. These sites are not all County Council or City Council owned land is also partly within Network Rail ownership.

Area North of Lowther Street Including Rickergate

17. It is noted that this site is proposed to be a focus for new retail development in Carlisle. There is considered to be a risk that locating such a large quantum of retail floorspace on a single site could be prejudicial to the overall balance of commercial development across the City Centre. We have concerns that the focus for new commercial activity is increasingly to the north of the City, and it is important that further development here is not detrimental to the economic well-being of locations elsewhere in the City Centre, in particular the southern end and Botchergate.

18. To address this issue, it is considered that the scale of new development in the City should be reflective of an up to date retail assessment and the role and timing of any development at Rickergate be complementary to the operation of the City Centre and the delivery/reuse of other key development sites across it. In addition to this, it is recommended that through the Development Framework, consideration is given to what alternative sites may accommodate a proportion of the requirement for new town centre development.

19. The County Council considers that there are other sites that could incorporate an element of the City Centre’s retail requirement in the short term, potentially reducing the scale of development at the Rickergate site. These could include land at Courts/English Street as part of a wider redevelopment and the existing allocation at Lowther Street.

20. We have concerns regarding the transport implications of the level of development proposed at the Rickergate site. At this stage, it is difficult to quantify what the impact the proposals are likely to be. However initial
highways and transport modelling work undertaken in April 2014 indicated that junctions in this area will be operating close to capacity without any further development in the City Centre. The proposed development will have to be tested as part of the modelling work that is scheduled to support the Local Plan.

21. It is expected that the highways and transport improvement needed to support the Local Plan will be subsequently set out with the Infrastructure Delivery Plan. Cumbria County Council will assist with the preparation of the Infrastructure Delivery Plan and we welcome the recognition of this principle within the City Centre Development Framework. It is through this process that consideration can be given to the feasibility of the suggestion to access this site from Georgian Way and to pedestrianise Rickergate. In advance of such work, it is important to make it clear that these are only options, and not necessarily the preferred or deliverable solution.

*Caldew Riverside*

22. This large site is well related to the City Centre which benefits from the Caldew Cyclepath that runs through part of the site. This site has been vacant for a considerable period of time and given its location, its delivery should be given priority.

23. The proposed flexibility about the future use of this site is welcome. However consideration should be given to the potential role of housing development to help facilitate the delivery of new development and the benefits associated with city centre living. Consideration could also be given to the role of office development as part of a mix of uses at this site.

24. Nevertheless, uses of land here would need to be compatible with the highway network and be appropriately tested. Previous modelling work undertaken in April 2014 suggests that junctions in the vicinity of the site will be operating close to capacity. A key constraint to the site is access and a core part of development here will need to consider improved west / east pedestrian access and opportunities for inter-linkages with the Caldew Riverside Cycleway. Given this issue, the proposed strategy should include reference to the requirement to improve pedestrian and vehicular access to the site.

25. This site is also affected by areas of flood risk. Although defences have been installed by the Environment Agency some areas in this location were recently flooded due to debris in a surface water flapvalve. Therefore, any development should take consideration of this and ensure any new buildings in the area are constructed so that they are resilient to any flooding that may occur.

*Lowther Street / Portland Square*

26. This area contains two distinct areas; Lowther Street; and the area around Warwick Road and Portland Square.
27. Recognition of the County Council’s efforts to deliver sustainable uses for Portland Square is welcome.

28. Nonetheless it is recommended that references to the bus station being a “limited transport facility” should be removed as it appears a contradictory statement which is not based on evidence. References to “enhance transport movement circulation (where possible)” fail to pick up on the importance of pedestrian movement and should be reworded to state “enhance pedestrian and vehicular movement”.

Primary Shopping Area

29. Carlisle enjoys a relatively strong core retail area, and it will be important that the role of this area is not undermined in the pursuit of new development opportunities.

30. It is agreed that there do not appear to be any strategic scale development sites in this location. Nevertheless it is considered that the Development Framework should be clear that proposals to refurbish and/or reuse buildings that come available are appropriate.

31. Housing within the City Centre can have a role in supporting the vibrancy of the City Centre, and opportunities to deliver housing above existing commercial units will have an important role by allowing people to live close to shops and services, thus enhancing the level of activity within the City Centre. It is suggested that this point can be addressed by an appropriate policy within the Local Plan.

32. Retaining the vibrancy of the existing retail area should be an important priority. Therefore, when considering the scale of development now proposed at Rickergate, there is a clear need to ensure that the vitality and viability of the existing town centre and the redevelopment/reuse of other available sites is not undermined by what may be an unbalanced approach to meet the retail needs.

33. Paragraph 8.10 it is not clear what ‘maintain and enhance transport movement circulation’ is referring to and it is suggested this is reworded to state; manage and maintain vehicular access to key sites.

Historic Quarter

34. This area is very important to the creation of sustainable development in Carlisle. The protection of this areas role therefore needs to be a priority for the Local Plan. As part of this, it is considered that the Framework should be more aspirational about the delivery of appropriate changes of uses in this area, and the introduction of sensitive new design elements that can enhance yet respect the character of this area.

35. We note this section refers to an aspiration to; “Increase Pedestrian Permeability and Accessibility” around Castle Way. It is considered that this reference should be removed as pedestrian permeability and accessibility improvements here, are not considered to be well related to the role of the Framework.
Botchergate

36. Botchergate is a key gateway to the City Centre. Its revitalisation therefore needs to be priority for the City Centre. The identification of the new site for Cumbria County Council’s offices and the acknowledgement of the regenerative benefits of this development in the Framework are therefore welcome.

37. Nevertheless, we are concerned that at present the Framework fails to fully recognise the value of this location and the need to be aspirational when considering its future role. In particular reference should be made to the appropriate reuse of empty and vacant sites.

38. References to “enhance transport (movement circulation (where possible)” does not pick up on the importance of pedestrian movement and should be reworded to state “enhance pedestrian and vehicular movement”.

End.