

# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

## Stage 2 Chapter 01

20605	Support	Policy:	n/a	1.11	o8
o83				The Coal Authority	
Detail	Site/Policy/Paragraph/Proposal – Paragraph 1.11 Test of Soundness Positively Prepared - Yes Justified - Yes Effective - Yes Consistency to NPPF - Yes Legal & Procedural Requirements Inc. Duty to Cooperate - Yes				
	Support – The Coal Authority welcomes the recognition of the Cumbria Minerals and Waste Local Plan and the need to reflect the prescribed Mineral Safeguarding Areas into this Local Plan once they are adopted.				
Response	Comment of support noted.				
Proposed Change	No proposed change.				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20529	Objection	Policy: n/a	1.11 & 1.40	8 & 13
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	Amended paragraph 1.11 of the Draft LP mentions Neighbourhood Planning Areas, with specific reference to Dalston. However; no reference is made to Parish Plans and Design Statements. These documents commonly result from widespread and effective community involvement undertaken by Parish Councils, often with assistance from the LPA, and are capable of being used to inform Local Plans and planning applications. These should be noted along whenever reference is made to Neighbourhood Planning or Neighbourhood Planning Areas.			
	With regard to paragraph 1.40 - Settlement Boundaries the Parish Council maintains the view expressed in its first response to consultation, when it urged retention of settlement boundaries as 'indicative boundaries' only. Not being definitive these would not in any way inhibit the responsiveness or flexibility of the LPA, but would greatly serve the interests of community engagement through illustrating the parameters of community identity – a significant factor when considering proposals that may significantly re-shape or re-define such a community. It must be remembered that the NPPF, although not advocating the use of settlement boundaries, certainly does it prohibit their retention.			
Response	Comments are noted. Reference to Parish Plans and Design Statements has now been inserted into the introductory paragraphs of the Plan. In terms of comments relating to including an 'indicative boundary' for settlements in order to illustrate the parameters of community identity, it is considered that this is something that could be established within a Community Plan or through rural masterplanning. If a settlement boundary is not identified for a 'planning function' (as suggested for community identity) then it should not be included within the Local plan.			
Proposed Change	The following has been inserted into the introductory paragraphs of the Plan - 'Parish Councils and communities can also produce village design statements and parish plans (also known as community led plans). Provided that these are consistent with planning policies, their design and land use aspects will be endorsed by planning however, whilst they are material considerations in assessing planning applications, they are not statutory documents and don't form part of the Local Plan like neighbourhood plans'.			

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Consultee Ref No	Consultees.Contact			Organisation	Agent	
20623	Objection	Policy:	n/a	1.13	8	
104	Emily Hrycan			English Heritage North West		
Detail	A requirement of the NPPF (Paragraph 169) is that a sound local plan will be based on a strong upto-date evidence base about the historic environment. This should be used to assess the significance of the heritage assets in the area and the contribution they make to the Borough.					
Response	The published evidence base available on the Council's website lacks sufficient evidence that relates to the historic environment. The Rural Masterplanning In Carlisle District includes a number of settlement profiles of, rural areas, which references the historic environment (yet the findings of this have not been used to inform the Local Plan).					
	The Plan needs to be expanded to explicitly detail the heritage assets in the Borough and to make an assessment of their contribution to the area.					
	Paragraph 2.8 of the spatial portrait at the outset of the Plan already explicitly acknowledges the district's heritage assets as "an extremely important asset, which contributes significantly to the character and attractiveness of the area...". This section also refers to the number and nature of the various key individual heritage assets, in doing so making clear their significance as a key influence on local character and distinctiveness. Notwithstanding this however, there is an intention to elaborate the spatial portrait to acknowledge Carlisle's historic evolution and origins, and to highlight unique assets and the District's attributes, in doing so further reinforcing the importance of Carlisle's heritage in moving forward.					
Proposed Change	Regard has been had to the Rural Masterplanning studies, alongside other evidence of relevance, particularly with regard to identifying where development can be accommodated most sensitively within a number of the District's rural settlements.					
	Elaborate the spatial portrait to acknowledge Carlisle's historic evolution and origins, and to highlight the District's key heritage attributes and assets.					
20560	Comment	Policy:	n/a	1.19	09	
193	Sue Tarrant			Clerk to Wetheral Parish Council		
Detail	Community Infrastructure Levy Should be adopted. All agree levy must come back to Local Community					
Response	Comments noted. A pre-requisite of being able to introduce a Community Infrastructure Levy is an up to date Development Plan, as well as clear evidence of a funding deficit with regards to the delivery of infrastructure which has been proven as essential in order to realise the ambitions of the Development Plan. Alongside the Local Plan the Council continues to engage with a wide array of infrastructure providers through the process of preparing the Infrastructure Development Plan (IDP). The IDP will, once at an advanced stage later in the year, provide key evidence with regards to identifying if there is a need for CIL within Carlisle, at which point a stronger commitment could be included in the Plan. Beyond this it must also be acknowledged that even if a Council resolution to progress with CIL is forthcoming, whether one could be introduced or not would depend on an assessment of the viability implications of doing so, and a charging schedule would ultimately have to be found sound through the course of a public examination.					
Proposed Change	No Change but ensure that the key findings from the Infrastructure Delivery Plan are reflected where appropriate within the publication draft of the Local Plan.					

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20590	Objection	Policy:	n/a	1.19	9	
196	Mrs S Tarrant			Clerk to Cummersdale Parish Coun		
Detail	Disappointed that the CIL consultation did not run concurrently with the Local Plan.					
Response	The CIL process requires an up to date Development Plan [i.e. Local Plan]. It can only be once the Local Plan progresses that CIL can be considered and any consultations will be ran independently.					
Proposed Change	No change.					
20298	Support	Policy:	n/a	1.42		
234	S Nicholson			Aoo8		
Detail	Support for the stance of not pursuing settlement boundaries on the Local Plan Policies Map in respect of the various rural villages so as to, inter alia, be responsive to local circumstances and plan housing development to reflect local needs.					
Response	Comment of support noted.					
Proposed Change	No proposed change.					
20165	Support	Policy:	n/a	1.42		
034	Lucy Adamski			Aoo8		
Detail	Support for the stance of not pursuing settlement boundaries on the Local Plan Policies Map in respect of the various rural villages so as to, inter alia, be responsive to local circumstances and plan housing development to reflect local needs.					
Response	Comment of support noted.					
Proposed Change	No proposed change.					

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# STAGE 2 REPRESENTATIONS

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## Stage 2 Chapter 02

20548 Support Policy: n/a

270 Carlisle Shopping Centre Ltd A028

Detail	<p>The Vision for the District Local Plan sets out the long term objectives for Carlisle in terms of the future of the City Centre and various other aspects of the District. The Vision sets out that as the urban capital of Cumbria, Carlisle should further establish its position as a centre for activity and prosperity in the north-west. To achieve this, there is a need to encourage investors and developers to invest their resources in Carlisle, to deliver an excellent supply of quality market and affordable homes, businesses, accessible services and a wide cultural offer. This is intended to result in a vibrant City surrounded by high quality urban and rural environments with prosperous market towns and thriving villages.</p> <p>We fully support this Vision, and consider that Carlisle has significant opportunities to achieve the objectives set out in the new Local Plan. We would recommend that any development that incorporates retail or leisure should be delivered in the City Centre as a priority, with the surrounding market towns and thriving villages offering a supporting role to the main retail provision within the City Centre.</p>
Response	Support for the relevant elements of the Plan's vision and objectives, including the priority afforded to the City Centre as the continuing focus for retail and leisure development, is noted.
Proposed Change	No change considered necessary.

20123 Support Policy: n/a

218 Executors of Mrs M Coulson A013

Detail	<p>We welcome the Council's objectives outlined in Chapter 2. In particular the Housing Objective which seeks development of housing in a 'variety of locations' which will help build communities and support economic growth. It is vital the Council recognise the important role smaller rural villages have to play in servicing the local community and surrounding rural hinterland.</p>
Response	Support noted.
Proposed Change	No change considered necessary.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20213	Support	Policy: n/a		
077	Mr Alan Hubbard	National Trust		
Detail	National Trust continues to support the proposed Vision.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20620	Comment	Policy: n/a	17	
080	Mike Downham	Carlisle Food City Steering Group		
Detail	Vision - We suggest the insertion after "... cultural offer" of "..., including locally produced food."			
Response	Whilst recognising the importance of seeking to promote and secure local food production across the Carlisle District, this issue is not considered to be of strategic importance from a spatial planning perspective to warrant inclusion within the Plan's overarching vision. Notwithstanding this efforts will however continue be made to ensure that, where appropriate, opportunities are taken elsewhere within the Plan to highlight the benefits of and to act to reinforce efforts focussed on promoting and securing locally produced food.			
Proposed Change	No change considered necessary.			
20339	Objection	Policy: n/a	18	
154/26/27	Mr Bryan Craig			
Detail	I would like to see the word 'greatest' removed from the second line.			
Response	Agreed that the objective should be amended as suggested, through recognition that the focus should be on avoiding development which is inappropriate, a test which will be proportionate to the severity of the risk of flooding faced.			
Proposed Change	Amend as suggested to instead refer, within the second sentence of the 'Climate Change and Flood Risk' objective on page 18, to "areas at risk of flooding".			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	
20624	Objection	Policy: n/a	18	
104	Emily Hrycan	English Heritage North West		
Detail	<p>Spatial Strategy and Strategic Policies Bullet 2 : We welcome the reference to protection and enhancement of the historic environment as one of the key objectives for the spatial strategy.</p> <p>However, there appears to be no spatial strategy for the historic environment.</p> <p>We also welcome the inclusion of a specific reference to the historic environment and the objectives contained within.</p> <p>The Plan needs to introduce a specific strategic policy, which deals with the historic environment which would detail the Council's spatial strategy and how it will be delivered locally.</p>			
Response	<p>Consideration will be afforded to how the Plan's strategic policies can be strengthened to reflect the Plan's approach to the conservation and enhancement of the historic environment, including through the possible addition of a strategic heritage policy.</p>			
Proposed Change	<p>Afford consideration as to how the Plan's strategic policies can be strengthened to reflect the Plan's approach to the conservation and enhancement of the historic environment, including through the possible addition of a strategic heritage policy.</p>			
20627	Support	Policy: n/a	26	
104	Emily Hrycan	English Heritage North West		
Detail	<p>Objectives: We welcome the expansion of this objective, which now deals with the historic environment.</p>			
Response	<p>Support noted.</p>			
Proposed Change	<p>No change considered necessary.</p>			
20561	Objection	Policy: n/a	2.12 - 2.15	22 - 23
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>All agreed a new pipe line would be preferable to a villages such as Great Corby &amp; Wetheral- The City Council should be more insistent.</p>			
Response	<p>The Local Plan is accompanied by a separate Infrastructure Delivery Plan, the purpose of which is to understand the impacts of the proposed levels of growth within the Local Plan on a wide array of infrastructure provision, including utilities provision, and ultimately to detail how any gaps or pressures will be resolved. The IDP is being developed with the full engagement of a wide array of Infrastructure providers, including United Utilities, who are committed to joint working through the process of the IDP to ensure that plans are in place, where needed, to secure the timely delivery of necessary infrastructure. Significantly large developments, including the proposed Carlisle South Urban Extension, will be supported through the development of Infrastructure Schedules as part of the on-going work on the Infrastructure Delivery Plan and/or through subsequent and more detailed masterplanning work.</p>			
Proposed Change	<p>No change considered necessary.</p>			



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20626	Comment	Policy:	n/a	2.24 & 2.26	22	
104	Emily Hrycan			English Heritage North West		
Detail	We welcome recognition of the importance the Districts heritage plays in tourism and the overall economy of Carlisle. However, as mentioned above there needs to be a proper assessment and description of this in the portrait of the District and reinforced in the relevant policy.					
	The Plan should be expanded to detail the historic environment throughout the District and the importance of this in relation to tourism should be emphasised.					
Response	Paragraphs 2.8, 2.24 and 2.25 of the spatial portrait at the outset of the Plan already explicitly acknowledges the importance of heritage assets in relation to tourism, and also refers to the number and nature of the various key individual heritage assets across the District. Notwithstanding this however, paragraph 2.26 will be amended (equally in response to representation 20227) to further reonforce that the heritage assets referred to, as well as the high quality environment in and around Carlisle District, contribute towards Carlisle's appeal as a visitor destination.					
Proposed Change	Amend paragraph 2.26 to instead read in part as follows "...The historic core of the city includes Carlisle Castle, Tullie House Museum, Carlisle Cathedral precinct, the City Walls, the Courts, the Market Cross, the Old Town Hall and the Guildhall. These and other heritage and cultural assets, including the Sands Centre and proposed Warwick Street Arts Centre, combine with the high quality environment in and around the District to contribute towards Carlisle's appeal as a visitor destination. Providing potential for economic diversification, particularly within the rural area, opportunities of this nature are already being supported along for example the route of....."					
20227	Objection	Policy:	n/a	2.26		
o88	Elizabeth Allnutt			Save Our Streets		
Detail	Para 2.26 Culture and Heritage. The proposed Arts Centre in Warwick Street should merit a mention here.					
Response	Agreed that a reference to the proposed Arts Centre at Warwick Street should be added (in concert with other amendments to paragraph 2.26 in response to representation reference number 20626).					
Proposed Change	Amend paragraph 2.26 to instead read in part as follows "...The historic core of the city includes Carlisle Castle, Tullie House Museum, Carlisle Cathedral precinct, the City Walls, the Courts, the Market Cross, the Old Town Hall and the Guildhall. These and other heritage and cultural assets, including the Sands Centre and proposed Warwick Street Arts Centre, combine with the high quality environment in and around the District to contribute towards Carlisle's appeal as a visitor destination. Providing potential for economic diversification, particularly within the rural area, opportunities of this nature are already being supported along for example the route of....."					
20340	Objection	Policy:	n/a	2.8	20	
154/26/27	Mr Bryan Craig					
Detail	Dalston is not a market town and this needs to be re-worded possibly by taking out 'and' and inserting' plus' taking out 'smaller' and adding 'other'.					
Response	Agree that paragraph 2.8 should be reworded to exclude reference to Dalston being a historic market town.					
Proposed Change	Amend as suggested.					

RepNo	Status	Paragraph	Page	Stage 2 Map:
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20625	Objection	Policy: n/a	2.8	20
104	Emily Hrycan	English Heritage North West		
Detail	<p>There has been no proper, accurate assessment of the significance of heritage assets in the area and the contribution they make to the Borough (NPPF, Paragraph 169). This paragraph needs to expand on the portrait of the built heritage within the District to illustrate this. This section would benefit from breaking the district down into smaller areas with a description of each one (to tie in with the detailed policy maps). Although reference has been made to the number of listed buildings and conservation areas. The Plan does not go far enough to show the character of the area and the contribution it makes to all aspects of life and why it is special. Further into the document, reference is made to a variety of heritage assets (both designated and nondesignated) and this should be brought out here to be consistent. They have been highlighted so are obviously considered an important part of the character of the District for example historic market towns.</p> <p>The Plan needs to explicitly detail the historic environment and heritage assets and the contribution they make to the whole District. The Plan needs to make sure that reference to specific heritage assets that are mentioned elsewhere in the Plan are mentioned here.</p>			
Response	Consideration will be afforded to restructuring and elaborating elements of the spatial portrait to address these concerns, although in the interests of a succinct and focussed Plan care must evidently be afforded to avoid unnecessary repetition throughout.			
Proposed Change	Afford consideration to restructuring and elaborating elements of the spatial portrait to address the document concerns.			
20112	Objection	Policy: n/a		Map 1
214	Mr Nicholas Bethune	Campaign for Borders Rail		
Detail	<p>The information displayed on this map is incomplete as the existing Mossband – Longtown MoD freight line is not shown. This line would be crucial to any reinstatement of the former Carlisle – Borders – Edinburgh railway (known as the Waverley Route) as it would provide an alternative connection to the West Coast Main Line, avoiding the significant breaches of the original route between Longtown and Carlisle. It could also play a role in the development of surplus land at and around Longtown MoD for other uses, as envisaged by the Local Plan. Please refer to our separate Consultation Response document for comprehensive details and background to this and our other comments.</p> <p>Map to be amended to show freight---only railway line from Mossband Junction to Longtown MoD (See Figure 2, in attached Consultation Response document).</p>			
Response	Noted. The key diagram will be updated to show not just this line from Mossband to Longtown, but also to show an indicative route for the proposed Border railway project, as requested in other comments you have submitted to the plan.			
Proposed Change	Update key diagram to show indicative route of the Waverly line.			

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20341	Objection	Policy: n/a	25	Map 1
154/26/27	Mr Bryan Craig			
Detail	Policy S3 is of concern as the map shows that it is focussing development in the direction of Dalston taking in the whole area between the A595 than the M6 Junction 42.			
Response	The key diagram identifies Carlisle South, which is the subject of Policy S3, as a broad location in a purely indicative sense only. Policy S3 makes clear that the development of Carlisle South would be governed by future masterplanning work, and it would be through this process where consideration would be afforded to where the appropriate detailed boundaries and scale and nature of development would be established. Future masterplanning work would be subject to its own public consultation, as too would any work to take forward the outcomes through a formal planning process such as a further Local or perhaps Area Action Plan.			
Proposed Change	No change considered necessary.			

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# STAGE 2 REPRESENTATIONS

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## Stage 2 Chapter 03

20628	Objection	Policy:	n/a		26
104	Emily Hrycan			English Heritage North West	
Detail	Strategic Policies: The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment. The Plan for Carlisle does not appear to have a strategic policy to deal with the historic environment.				
	The Plan needs to introduce a specific strategic policy, which deals with the historic environment which would detail the Council's spatial strategy and how it will be delivered locally.				
Response	Consideration will be afforded to how the Plan's strategic policies can be strengthened to reflect the Plan's approach to the conservation and enhancement of the historic environment, including through the possible addition of a strategic heritage policy.				
Proposed Change	Afford consideration as to how the Plan's strategic policies can be strengthened to reflect the Plan's approach to the conservation and enhancement of the historic environment, including through the possible addition of a strategic heritage policy.				

20630	Objection	Policy:	n/a	3.15	32
104	Emily Hrycan			English Heritage North West	
Detail	Although we welcome the recognition that heritage is important to Carlisle and gives it a unique identity. No proper, accurate assessment has been made in the Plan of the historic environment and therefore, the significant role that heritage plays in the District has not been reinforced.				
	The Plan needs to be expanded to detail the character and distinctiveness of the historic environment in the District of Carlisle and the contribution it makes to the area.				
Response	It is not agreed that no proper accurate assessment has been made within the Plan of the historic environment, and consequently that the role heritage plays in the Plan has not been reinforced. Notwithstanding this consideration will however be afforded as to whether this element of the Plan can be strengthened, and opportunities to proactively engage English Heritage in refining the Plan in this regard will be taken.				
Proposed Change	Afford consideration as to whether reference to the significant role that heritage plays in the District can be strengthened further.				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20629	Objection	Policy: n/a	3.5	28
104	Emily Hrycan	English Heritage North West		
Detail	Reference should be made to the historic environment. Insert "historic Environment" in the list of special places.			
Response	Agreed that such a reference should be added but in order to maintain consistency with the NPPF, 'heritage assets' as opposed to 'historic environment' should be referenced.			
Proposed Change	Amend as suggested to include a reference to "heritage assets".			
20315	Support	Policy: S 1		
062		Church Commissioners for England	A013	
Detail	We support the inclusion of Policy S1 as it follows the requirements set out by the Planning Inspectorate and the overall aim of the National Planning Policy Framework (NPPF). It is vital that the Plan is prepared positively and that development needs and demands are met during the plan period. The NPPF seeks that development proposals which accord with the development plan should be approved without delay, unless material considerations indicate otherwise. Based upon a 'plan positively' agenda, policies must not contain too many restrictive and unduly onerous conditions which may result in unviable and, ultimately, undeliverable development sites. We reiterate the importance of this in several other policies set commented on.			
Response	Comments noted. The development of the plan is being supported by a plan wide viability study, the purpose of which is to assess and understand the cumulative impact on development viability of the policies within the Local Plan, in order to ensure that such requirements are appropriate and that they do not constitute a financial burden.			
Proposed Change	No change considered necessary.			
20042	Comment	Policy: S 1		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20704	Support	Policy: S 1		
194	Michael Barry	Cumbria County Council		
Detail	<p>Reconfirmed comment No 0984</p> <p>The Presumption In Favour of Sustainable Development is a planning principle expressed within the National Planning Policy Framework. This policy highlights how this principle is to be applied in Carlisle and it is considered to be broadly appropriate.</p>			
Response	Comment noted. This is a model policy shaped by the Planning Inspectorate and recommended for inclusion in Local Plans in order for them to be found sound.			
Proposed Change	No change to the policy in light of this response			
20530	Comment	Policy: S 1		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>The Parish Councils welcomes the inclusion of working proactively with applicants 'and communities'.</p> <p>However serious doubt remains as to the long term wisdom of including the commitment to approve applications, "without delay, unless material considerations indicate otherwise".</p> <p>The progress of an application may, at any time, be hindered by some unforeseen circumstance that is not, of its self, a material consideration. This may in turn lead to officers becoming subject to significant pressure to act in haste, and to then repent at leisure.</p> <p>Some protective flexibility of response should be retained by the LPA, through replacing "without delay" with, for example, "as soon as practicable". This expedient would then accommodate any unforeseen delaying circumstance which is not a material consideration.</p> <p>As the policy specific to Sustainable Development Policy S1 should make clear that proposals for development will be assessed on the basis of the need for development to be in the location specified and; that priority should be given to the re-use of previously developed land, with particular emphasis on site selection within the urban area.</p>			
Response	Retention of the phrase "without delay" is considered necessary to ensure conformity with national guidance and consistency with the model sustainable development policy strongly advocated for inclusion within development plans by the Planning Inspectorate. The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, with the specific issues raised already considered to be adequately covered by policies elsewhere within the Plan.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20224	Objection	Policy: S 1		
089	Elizabeth Allnutt	National Allotments Society		
Detail	The principles of Sustainable Development are stated here as a policy implying that this is desirable and attainable. Yet the final paragraph and the two bullet points completely negate this by saying that it can be completely ignored. This undermines the entire policy and principle of sustainable development and also favours developers if they wish to pursue it. This is unfair to communities and those representing the environment who may not have the same resources at their disposal to challenge policies and is therefore unsustainable.			
Response	The final paragraph and two bullet points repeat policy contained in the National Planning Policy Framework (NPPF) and therefore reflect the reality of the situation in the event that no local policies are relevant to an application or that relevant policies are out of date. The retention of these elements of Policy S1 is therefore considered necessary to, aside from ensuring the required conformity with the NPPF, provide clarity as to what happens in such circumstances. It must be noted that despite the presumption in favour of sustainable development within the NPPF, as a framework it equally acts to make clear when development should be restricted. The final bullet point within Policy S1 (and within the Framework itself) therefore acts to ensure that the need for proposed developments would be balanced against a wide array of other considerations including environmental matters, in doing so alleviating the concerns described.			
Proposed Change	No change considered necessary.			
20166	Support	Policy: S 1		
034	Lucy Adamski		A008	
Detail	Considered to be an appropriate and considered approach in accordance with the central thrust of the NPPF.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20083	Support	Policy: S 1		
209	Mr Peter Lamb		A025	
Detail	We support this policy which indicates that the Council 'will always work proactively with applicants, and communities, jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions of the area.' It is to be hoped that such an approach will be implemented and that the more inflexible approach of the existing Local Plan is fully put aside – not only from the point at which the new plan becomes adopted, but from now.			
Response	Support noted. The approach taken forward through Policy S1 came into being when the National Planning Policy Framework was introduced in March of 2012. The Council have therefore, albeit in advance of their own local plan policy on the presumption in favour of sustainable development, accordingly implemented such an approach since this date.			
Proposed Change	No change considered necessary.			



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20124	Comment	Policy: S 1		
218	Executors of Mrs M Coulson		A013	
Detail	<p>We welcome the positive approach taken in Policy S1 that reflects the presumption in favour of sustainable development contained in the NPPF. It is vital that the Plan is prepared positively and that development needs and demands are met during the plan period.</p> <p>The NPPF seeks that development proposals which accord with the development plan should be approved without delay unless material considerations indicate otherwise. Based upon a 'plan positively' agenda, policies must not contain too many restrictive and unduly onerous conditions which may result in unviable and, ultimately, undeliverable development sites. We reiterate the importance of this in several other policies set out in other representations.</p>			
Response	Comments noted. The development of the plan is being supported by a plan wide viability study, the purpose of which is to assess and understand the cumulative impact on development viability of the policies within the Local Plan, in order to ensure that such requirements are appropriate and that they do not constitute a financial burden.			
Proposed Change	No change considered necessary.			
20549	Support	Policy: S 1		
270		Carlisle Shopping Centre Ltd	A028	
Detail	<p>Policy S1 promotes a positive approach that reflects the presumption in favour of sustainable development, consistent with the requirements of the National Planning Policy Framework. The policy goes on to state that proposals should be approved wherever possible securing development that improves the economic, social and environmental conditions of the area.</p> <p>We consider that this planning policy is positive in respect of securing the best possible growth in Carlisle District, in relation to housing, economy and culture and leisure provision, and we are supportive of the general principle of sustainable development being secured in Carlisle.</p>			
Response	Support noted.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20228	Objection	Policy: S 1		
088	Elizabeth Allnutt	Save Our Streets		
Detail	The principles of Sustainable Development are stated here as a policy implying that this is desirable and attainable. Yet the final paragraph and the two bullet points completely negate this by saying that it can be completely ignored. This undermines the entire policy and principle of sustainable development and also gives the whip hand to developers if they wish to pursue it. This is unfair to communities and those representing the environment who may not have the same resources at their disposal to challenge policies in the CDLP and is therefore unsustainable.			
Response	The final paragraph and two bullet points repeat policy contained in the National Planning Policy Framework (NPPF) and therefore reflect the reality of the situation in the event that no local policies are relevant to an application or that relevant policies are out of date. The retention of these elements of Policy S1 is therefore considered necessary to, aside from ensuring the required conformity with the NPPF, provide clarity as to what happens in such circumstances. It must be noted that despite the presumption in favour of sustainable development within the NPPF, as a framework it equally acts to make clear when development should be restricted. The final bullet point within Policy S1 (and within the Framework itself) therefore acts to ensure that the need for proposed developments would be balanced against a wide array of other considerations including environmental matters, in doing so alleviating the concerns described.			
Proposed Change	No change required.			
20177	Support	Policy: S 1		
225	JR & JA Workman		Aoo8	
Detail	Considered to be an appropriate and considered approach in accordance with the central thrust of the NPPF.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20214	Support	Policy: S 1		
077	Mr Alan Hubbard	National Trust		
Detail	The revised wording suitably addresses the concern previously expressed by National Trust.			
Response	Support noted.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20299	Support	Policy: S 1		
234	S Nicholson		Aoo8	
Detail	Considered to be an appropriate and considered approach in accordance with the central thrust of the NPPF.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20150	Support	Policy: S 1		
223		Taylor Wimpey UK Limited	Ao26	
Detail	Taylor Wimpey UK Limited broadly supports the policy presumption contained in Policy S1 with regards to sustainable development as it accords with the Framework [para 14].			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20531	Comment	Policy: S 2		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>The Parish Council welcomes the inclusion of provision 'for the expansion of the urban area for Carlisle South' as moving toward a vital re-balancing of Carlisle, taking advantage of opportunities presented by the CNDR.</p> <p>However; J44 of the M6 has limited scope for expansion and is becoming congested, while J43 is only practical for traffic visiting Rosehill and Durranhill. A southern development route is required to both further alleviate urban traffic congestion and facilitate the draft LP's economic and residential aspirations for Carlisle South. Yet, whilst the policy seeks to utilise the M6 corridor to develop a high value employment area etc. It fails to consider linkage of that corridor to Carlisle South except via the CNDR. If re-balancing is to have any real chance of success the policy should encourage inward investors by including a strategic forward plan for the provision a southern link joining J42 with the CNDR.</p>			
Response	Comments noted. In refining the Plan towards publication draft, consideration will be afforded as to where within the spatial strategy and strategic policies section of the Plan reference to the aspiration for a strategic link road between J42 of the M6 and the CNDR can best be made, and how existing references can be strengthened.			
Proposed Change	Act to ensure that adequate and strong references, which acknowledge the strategic importance of a link road between J42 of the M6 and the CNDR, are included within the spatial strategy and strategic policies section of the Plan, particularly within the context of Carlisle South broad location.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20365	Objection	Policy: S 2		
121	Mike Fox	Brampton Economic Partnership		
Detail	<p>Same as original (stage one) representation (ref. 0559). A major concern on the document is that it doesn't address Brampton issues for the future on a holistic basis, when compared with the approach adopted for Carlisle. Brampton obviously is a much smaller community, yet it faces the same issues as Carlisle and is with Longtown and Dalston recognised as a larger settlement, but not one which justifies its own coordinated plan.</p> <p>The lack of a coordinated approach to development in Brampton means the aspirations of the Partnership and Brampton Parish Council to see Brampton, as a vibrant 21st Century market town, are likely to be significantly diminished.</p> <p>The rural area surrounding Brampton: It is disappointing that there appears to be no element of growth predicted in the plan and the sole consideration is about buildings, new or conversions. Additionally the local growth centres matters seem to concentrate solely on housing developments.</p>			
Response	<p>The Plan seeks to put in place a framework to address evidenced key issues and key areas of change in order to shape the District in its widest sense across the next fifteen years. Whilst Brampton is recognised as one of the larger settlements within the District, in the absence of any evidence to support specific localised issues within Brampton which are capable of being influenced through the planning system, it is not considered possible or in any event necessary to introduce a locally specific policy. Many of the policies within the Plan are appropriately generic in their nature and will apply equally as effectively in Carlisle, Brampton or other settlements where more generic planning issues are encountered.</p> <p>In developing the Plan the Rural Master planning work has been used, alongside other evidence of relevance, to inform the policies and proposals within and this includes that carried out for Brampton. Through recognition of the scale of Brampton as one of the largest settlements beyond the City within Carlisle, sites have been identified to accommodate housing growth, for which the associated investment, critical mass and expenditure levels will undoubtedly help to sustain local services and support Brampton in being a vibrant 21st Century Market Town.</p> <p>With regards to growth beyond housing, the Council are not aware of any evidence to support a need to allocate additional employment land or to extend the extent of the local retail/service centre which in any event the potential to do so is limited by the historic urban form of the town centre. The Carlisle Employment Sites study recognises the importance of established employment opportunities which already exist in Brampton, including Townfoot Industrial Estate, and policies within the Plan already seek to protect such areas. Notwithstanding the current evidence, should a an unforeseen demand for additional employment land/floorspace arise in Brampton or indeed elsewhere within the District within the plan period, the Plan is considered flexible enough to allow for and guide further development to take place.</p> <p>Beyond the Local Plan it must be acknowledged that a Neighbourhood Plan could be progressed, including for the wider parish of Brampton, again where considered necessary to address specific localised issues and where clear local support exists to do so.</p>			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20167	Support	Policy: S 2		
034	Lucy Adamski		A008	
Detail	Support the revision to this policy from the Summer 2013 consultation version such that housing allocations are now proposed for years 0-10 of the Plan and not just years 6-10.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20550	Support	Policy: S 2		
270		Carlisle Shopping Centre Ltd	A028	
Detail	<p>The Spatial Strategy sets out the objective to:</p> <p>"Strengthen and protect the city centre and other existing centres to help create sustainable centres where adequate services and facilities would be provided by balanced growth"</p> <p>We are supportive of the wording set out in this policy in relation to the City Centre's role as a retail and service centre however we consider that there is merit in setting out the need for enhancements to Carlisle City Centre to be treated as a priority for the Spatial Strategy as a whole.</p> <p>There is clear potential for the growth and improvement of the City Centre and the defined Primary Shopping Area (PSA) through the allocation of appropriate sites for retail and leisure development to enhance and improve the existing City Centre. As we have set out in the background to these representations, the owner of The Lanes has been exploring options to maximise the opportunities for expanding the Centre, with the intention to improve the facilities and services available. This in turn will benefit the more rural populations in the District.</p> <p>Given Carlisle's role as the urban capital of Cumbria with a significant rural catchment area, the City Centre has a crucial role in the servicing of these rural populations, for leisure, retail and employment. The new Local Plan has the opportunity to set out the direction for growth in terms of retail and leisure and the need to prioritise the development of Carlisle City Centre ahead of other market towns, whilst retaining a balance between the different areas.</p> <p>This approach is supported by the findings of the Carlisle Retail Study 2012, which states that whilst there is limited capacity in the initial years of the Plan, future development should aim to reinforce the City Centre as the prime retail location.</p>			
Response	Support noted. Agreed that Policy S2 should be amended to reinforce that the City Centre will be the focus for new retail and leisure development across the plan period.			
Proposed Change	Amend Policy S2 to explicitly state that the City Centre will be the focus for new retail and leisure development across the plan period.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20705	Objection	Policy: S 2		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0985</p> <p>Background information amended from previous submission; suggested Changes:</p> <p>Role of Settlements</p> <p>It is considered that this policy should look to provide commentary on the role of the key settlement of Carlisle, Brampton and Longtown together with an indication of the forms of development that would be appropriate elsewhere (i.e. Housing to meet local needs).</p> <p>Housing</p> <p>The proposed annual requirement of 665 is higher than the housing requirement identified within the latest Popgroup modelling. In light of this, it is suggested that consideration should be given to the annualised housing requirement as part of an update to Carlisle's SHMA.</p> <p>Commercial &amp; Employment Proposals</p> <p>In bullet point 1 to Policy S2, the text "identify a broad location for growth for the expansion of the urban area for Carlisle South" should be replaced with "identify a broad location for growth to the south of the city to allow growth to the urban area of Carlisle".</p> <p>The infrastructure delivery plan should consider elements of the strategic infrastructure needed to help deliver growth in South Carlisle.</p> <p>Natural Environment</p> <p>The text "Maintaining and enhancing the importance of environmental, heritage and landscape assets" should be revised to state; "Maintain and enhance the quality of environmental, heritage and landscape assets".</p> <p>Climate Change</p> <p>The text supporting this policy would benefit from making reference to localised/surface water flooding as an area of risk. (same as previous rep)</p>			
Response	<p>Policy S2 is to be redrafted and refocused following a review of the structure and content of the strategic section of the Plan. The points raised will be borne in mind as part of this process. With regards to the annual housing requirement to be taken forward by the Plan, it is acknowledged that updated evidence supports a downward revision. The Council will, drawing on updated demographic and economic projections, be acting to review the key outputs of the SHMA, and will ensure that this updated evidence is used to meaningfully inform the housing target contained within the publication draft of the Local Plan.</p>			
Proposed Change	<p>Afford consideration to the points raised through the process of reviewing the structure and content of the strategic section of the Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20043	Comment	Policy: S 2		
043	Nigel Winter	Stagecoach		
Detail	<p>For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc &amp; policy 10 and 11. Infrastructure; Policy 30 &amp; 36. Health, Education and Community; Policy 42 &amp; 44] add 'promote and support sustainable road passenger transport' to each.</p> <p>When developing employment and retail sites, consideration should be given to 'Pocket Park &amp; Ride'. Pocket Park &amp; Ride provides for the utilisation of under utilised car parks, located close to bus routes. Bus customers park in the under utilised car park for free, and ride on the scheduled bus services. Ideally best located outside of the urban area to give car drivers the best fuel, running cost and time savings, with reduced congestion and pollution in the City. This principle also supports sustainable bus services.</p> <p>Locations in Aspatria, Wigton, Brampton, Warwick Bridge, Longtown and sites close to the M6 junctions will offer the potential to reduce car volumes entering the City. Although relatively small sites will be pressed into use, the setup costs do not involve construction work, or supporting a bus service, rather just signage and a customer waiting environment conjunctive with safety and comfort.</p> <p>Nottinghamshire have such a principle in operation.</p>			
Response	<p>The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).</p>			
Proposed Change	<p>The 'Pocket Park &amp; Ride' initiative is an interesting one but it is considered that the notion would be best explored through the process of the Local Transport Plan which the County Council are responsible for leading on. Stagecoach's comments in this regard will be passed on to the County Council for their consideration, but the City Council will willingly engage in any future dialogue on this matter.</p> <p>Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20250	Comment	Policy: S 2		
033	Matthew Good	Home Builders Federation		
Detail	<p>The increase in the housing requirement to 665 dwellings per annum (dpa) is in general accordance with HBF comments upon the Preferred Options document. The HBF therefore generally supports an increase in the overall housing requirement of the district. The chosen figure accords with the economic growth scenario identified in the Housing Needs and Demand (2011) report. It should, however, be noted that the HBF regarded a housing requirement figure of 665dpa as a minimum requirement. In this regard it is important that the requirement is not seen as a ceiling but should be expressed as a minimum. The HBF therefore recommends a further modification to the policy to state; 'Deliver at least 665 dwellings per annum for the next 15 years,....'.</p> <p>Whilst the HBF is supportive of the increase it should be noted that the actual needs may be greater. As previously stated the 2011 Housing Needs and Demand Study (HNDS) identifies a shortfall of 708 affordable units per annum (page108). The need for affordable housing is therefore still 58 dwellings per annum above the overall housing figure suggested within the draft strategy. The Council will need to consider how it will make good this shortfall to ensure it is compliant with paragraph 47 of the NPPF. A high affordable housing figure tends to indicate a previous undersupply against need. If the Council continues to under-provide this will inevitably further exacerbate the need for affordable housing across Carlisle.</p> <p>The HBF is still concerned over the delivery of the plan given the continued reliance for 70% of the housing requirement to be provided within the urban area of Carlisle, the remaining 30% will be in the rural area. The HBF queried the deliverability of such a policy stance in our earlier representations. Our concerns were based upon the outputs from the 2012 Affordable Housing Economic Viability Assessment (AHEVA) which identifies that the urban area suffers from the greatest viability challenges and in some areas may be unviable, particularly once the policy aspirations of the Council are added to the costs of development. The HBF has not seen any further evidence to suggest that the Council can deliver against these proposed targets, this should be addressed prior to the next phase of consultation. If the Council wishes to pursue such a spatial strategy it should consider reducing the policy burdens within the areas which are currently constrained by economic viability. This will provide the greatest opportunity for delivery in such areas.</p>			
Response	<p>Support for the proposed housing requirement of 665 dwellings per annum is noted. Regardless of the eventual housing target taken forward by the Plan, it is agreed that it should be clarified within the Plan that the housing target set out is intended as a minimum which could be exceeded where it can be demonstrated that no other element of the spatial strategy would be prejudiced.</p> <p>Whilst the Council concur that evidently the opportunity must be taken to maximise the delivery of affordable housing through the planning process, it must equally be appreciated that there are genuine limitations as to how far the planning system alone can realistically alleviate affordable housing need. In this regard the Council maintain that the range of housing targets considered throughout the preferred options consultations adequately respond to a need to maximise affordable housing delivery. Finally it should be noted that the development of the plan is being supported by a plan wide viability study, the purpose of which is to assess and understand the cumulative impact on development viability of the policies within the Local Plan, in order to ensure that such requirements are appropriate and that they do not constitute a financial burden. This study, which builds on the previous 2012 AHEVA, provides further evidence to support the Council's pursuit of the proposed spatial strategy.</p>			
Proposed Change	Amend Policy S2 to clarify that the Plan's housing target is a minimum.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20254	Objection	Policy: S 2		
098		Sainsbury's Supermarkets Ltd	A015	
Detail	On behalf of our client Sainsbury's Supermarket's Ltd, we have reviewed the draft of the Carlisle District Plan – Preferred Options Stage 2 and would like to take this opportunity to state that representations submitted against policies during the Preferred Options Stage 1 consultation (September 2013) are maintained and should be fully considered in preparation of the Publication draft. Representation No 0434			
Response	Noted. For the avoidance of doubt both responses to the Stage One and Stage Two Preferred Options consultation will be used to meaningfully inform the evolution and refinement of the Local Plan towards a publication draft.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20316	Comment	Policy: S 2		
062		Church Commissioners for England	A013	
Detail	<p>Whilst we support Policy S2 in principle, it is considered that the Policy should be amended so that the first bullet point of the policy starts off by saying "Deliver at least 665 dwellings per annum...". The housing figures are a target, not a ceiling; therefore the flexibility of incorporating this new text is vital to ensure that the policy is in line with the NPPF and the overarching need to boost significantly housing in the district.</p> <p>With regard to the 6th bullet point, it is considered reasonable to amend the text to say "Make the best use of previously development land for new development, where viable, in locations ...". Unless a site is viable it will not come forward for development which will have adverse implications for the delivery of housing. Reliance on too many brownfield sites will therefore be detrimental to the delivery of the sound Local Plan.</p> <p>Furthermore, the Policy, as it stands, states that 70% of the annual development will be in urban Carlisle, with 30% in the rest of the rural area, including Brampton and Longtown. As the Council is proposing to promote sustainable development in rural areas, in line with the NPPF, where new housing will help to enhance or maintain the vitality of rural communities, there is concern that this ratio of 70:30 is potentially too restrictive.</p> <p>An amended ratio would be considered more appropriate. As set out in the National Planning Policy Guidance (NPPG), it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the NPPF, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.</p>			
Response	<p>It is agreed that it should be clarified within the Plan that the housing target set out is intended as a minimum which could be exceeded where it can be demonstrated that no other element of the spatial strategy would be prejudiced.</p> <p>The development of the Plan will be informed by evidence on viability most notably in the form of the Local Plan Viability Assessment. This study considers the viability implications of bringing forward development sites of differing natures, including whether such sites are greenfield or previously developed, and as such its findings will meaningfully continue to inform the approach to land use allocations to be taken forward.</p> <p>The Council consider that the proposed spatial distribution of planned housing growth is grounded in an appropriate logic which positively responds to meeting rural housing need. Whilst it is alleged that the approach adopted is too restrictive, this contention is not supported by any evidence as to why this is the case, nor consequently what balance is instead considered to be required.</p>			
Proposed Change	Amend Policy S2 to clarify that the Plan's housing target is a minimum.			
20300	Support	Policy: S 2		
234	S Nicholson		A008	
Detail	Support the revision to this policy from the Summer 2013 consultation version such that housing allocations are now proposed for years 0-10 of the Plan and not just years 6-10.			
Response	Support noted.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20084	Comment	Policy: S 2		
209	Mr Peter Lamb		A025	
Detail	<p>We support this policy in general terms, subject to the two caveats below:</p> <ul style="list-style-type: none"> <li>- in light of the National Planning Policy Framework, the housing development targets should be explicitly set out as minimum figures, with the inclusion of the words 'at least' before every numerical target. Such an approach has been taken elsewhere in England, for example in the South Wiltshire Core Strategy where the Inspector recommended that each target should be a 'floor not a ceiling'. File Ref: PINS/Y3940/429/8.</li> <li>- More emphasis on development in rural areas is required within the body of the policy. We submit that the following text be added to the policy as a discrete bullet point: 'to promote sustainable development in rural areas, housing will be permitted where it will enhance or maintain the vitality of rural communities.'</li> </ul>			
Response	Broad support noted. It is agreed that it should be clarified within the Plan that the housing target set out is intended as a minimum which could be exceeded where it can be demonstrated that no other element of the spatial strategy would be prejudiced. It is further agreed that Policy S2 should be extended to provide a degree of strategic coverage for the District's rural areas.			
Proposed Change	Amend Policy S2 to clarify that the Plan's housing target is a minimum. Further amend Policy S2 to provide strategic direction with regards to growth within the District's rural areas.			
20113	Objection	Policy: S 2		
214	Mr Nicholas Bethune	Campaign for Borders Rail		
Detail	<p>There is no stated policy aim of support for reinstatement of the former Carlisle – Borders – Edinburgh railway (known as the Waverley Route) from Carlisle to the Scottish border, despite it being a long-term aspiration expressed by Carlisle Council's leadership. A policy in the Regional Spatial Strategy (Cumbria Structure Plan) confirming this objective is no longer in force after that document was superseded by the NPPF in 2013.</p> <p>Please refer to our separate Consultation Response document for comprehensive details and background to this and our other comments.</p> <p>Policy S2 to be amended to include a statement confirming support for the reinstatement of the Carlisle – Longtown – Borders railway. This statement will replace the similar statement in the Cumbria Structure Plan 2001-2016 which would otherwise be lost.</p>			
Response	It is agreed that the strategic section of the Local Plan which sets out the spatial strategy should include reference to the longer term aspiration to reinstate Carlisle-Borders-Edinburgh rail connection. Current thinking is that reference to this aspiration would logically set within a new strategic transport policy within the Local Plan.			
Proposed Change	Include reference to the longer term aspiration to reinstate Carlisle-Borders-Edinburgh rail connection within the strategic section of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20151	Objection	Policy: S 2		
223		Taylor Wimpey UK Limited	A026	
Detail	Taylor Wimpey UK Limited objects to the spatial strategy principles of delivering 665 dpa for the next 15 years until the Council provides more up to date evidence on objectively assessed housing needs. However, Taylor Wimpey UK Limited broadly supports the spatial strategy to deliver 70% in the urban area of Carlisle and 30% in the rural area. It is considered that land at Deer Park, Kingsmoor Road will assist the Council in meeting their 70% development target in the urban area of Carlisle.			
Response	The Council consider that there is already adequate evidence within the public domain on and to support that the prescribed level of housing growth within the emerging Plan meets objectively assessed needs. Broad support for the proposed distribution of planned housing provision is noted. The merits of land at Deer Park in contributing to meeting the level of housing need identified within the emerging Plan are considered in response to representations from Taylor Wimpey UK Limited which relate to Policy 16.			
Proposed Change	No change considered necessary.			
20125	Comment	Policy: S 2		
218	Executors of Mrs M Coulson		A013	
Detail	In principle the Council's support for the delivery of new housing is welcomed although we question the proposed 70/30 urban/rural split. The introduction of the NPPF has brought about a major step change in the way Local Planning Authorities are encouraged to tackle housing delivery. The document seeks that Planning Authorities significantly boost the supply of new housing, ensuring that the long term viability of the more outlying rural communities are supported through rural diversification and the provision of additional new housing. This will help to enhance the population, retain young families and those of working age to create a more diverse community, support the future of local shops and facilities, boost the take up in local schools and public transport provision and ensure that rural communities thrive. Therefore, as stated above, whilst we support the Plan's aim (outlined at paragraph 3.11) to allocate specific housing sites across the district, we question the provision of just 30% of the dwellings in rural areas. As a predominantly rural district it is vital that the Local Plan recognises the important role these rural communities play. Limited development in rural areas over previous plan periods has put the services and facilities in many rural services at risk of closure and many local shops, schools, public houses and public transport provision have now disappeared from these communities. These smaller villages play an integral part in servicing the local community and it is vital that provision is made for their growth over the forthcoming plan period to ensure their continued contribution to their local communities.			
Response	The Council consider that the proposed spatial distribution of planned housing growth is grounded in an appropriate logic which positively responds to meeting rural housing need. Whilst it is implied that the approach adopted is too restrictive, this contention is not supported by any evidence as to why this is the case, nor consequently what balance is instead considered to be required.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20492 E2	Objection	Policy: S 2		
264	Mrs Elizabeth Hill-Gorst	SAVE WETHERAL VILLAGE GROU		
Detail	<p>Policy S2: How can 665 new dwellings per annum be sustainable or needed with the large amount of empty properties already built in the Carlisle Area. What about greater use of brownfield sites rather than endorsing build on greenfield sites e.g. 100 dwellings Wetheral on two farm fields. We have concerns about the current capacity of schools (all age groups) which are already full in the outlying areas e.g. Scotby and Cumwhinton, and future as there does not seem to be sufficient indication to build new schools.</p>			
Response	<p>Comment made to SA [20491 E21]</p> <p>Evidence supports that Carlisle needs an increased and steady supply of new homes across the next fifteen years. This need reflects a requirement to respond to changing demographics within the district and also in sustaining a robust economy. From a demographic perspective Carlisle's population continues to naturally grow, and this coupled with decreases in the average household size combine to result in a requirement for more new homes. As with most places Carlisle also has an ageing population, the consequence of which is a decreasing number of economically active people within the population who we rely upon to fill jobs. The evidence supports that delivering new homes to attract economically active people to the area, and importantly to help dissuade such people and particularly graduates from leaving Carlisle, has been proven as vital to sustaining and growing Carlisle's economy. The Local Plan seeks to positively respond to these needs, through identifying land to accommodate new homes, in the best interests of the District's future. The opportunity will however be taken to revisit this evidence in light of updated demographic and economic projections, to ensure that the housing target taken forward within the Plan remains robust.</p> <p>The Local Plan has sought to utilise opportunities to deliver new homes on brownfield sites wherever possible. Evidence supports however, partly owing to the success of previous planning and regeneration efforts, that there are simply not enough brownfield sites to accommodate the required number of new homes across the next fifteen years, particularly within the District's outerlying settlements. It must also be acknowledged that in some cases brownfield sites, whilst suitable for housing, cannot be viably developed owing to abnormal costs associated for example with their remediation, as is again supported by evidence. Consequently the need to rely on Greenfield sites to meet development needs is considered to be justified.</p> <p>In terms of school provision, it is acknowledged that currently nearby local primary schools are full. However, the Local Plan is looking ahead to 2030. The Education Authority has advised that development in Wetheral will impact on 1 foundation CE primary school (Scotby CE Primary School, Scotby) and 1 secondary academy (Richard Rose Central Academy, Carlisle). The existing primary school is projected to be full; meaning developer contributions will be required to ensure appropriate mitigation can be provided.</p> <p>With regards to secondary aged children, the catchment secondary school is Richard Rose Central Academy. When assessing school places, based on an 11 year average, there are considered to be 448 spaces available at this school. When the 205 pupils expected from the existing permissions are deducted (61 from Carl 21, Carl 22, Scot 2 and Cumw 3 and 144 from sites to north of city), the availability of school places falls to 243. On this basis there is anticipated to be a shortage of 6 secondary school places to meet the effects of development (243 places – 249 pupils). To address this, there will be a requirement for developer contributions to provide appropriate mitigation.</p>			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20342	Support	Policy: S 2	30	
154/26/27	Mr Bryan Craig			
Detail	I feel that the Spatial Strategy is correct.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20044	Comment	Policy: S 3		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			
20377	Objection	Policy: S 3		
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	Policy S3 Carlisle South is a major concern to the Parish Council. This is Policy should include a proposal for a Green Belt to the south of Carlisle Between Peter Lane and Dalston. It is very important that Dalston and Carlisle do not merge and a clear margin and separation is maintained Between the two distinct settlements. Carlisle should not be allowed to Sprawl over the open Countryside. (See Appendix 2).			
Response	Policy S3 makes clear that the development of Carlisle South as a broad location would be governed by future masterplanning work, and it would be through this process where consideration would be afforded to where the appropriate detailed boundaries and scale and nature of development would be established. Maintaining adequate distances between any urban extension and existing settlements in the wider locality, in order to avoid any coalescence and preserve their distinctiveness, would be a valid and undoubtedly essential approach of any such work. Future masterplanning work would be subject to its own public consultation, as too would any work to take forward the outcomes through a formal planning process such as a further Local or perhaps Area Action Plan, at which point the approach to and specific matters to be considered by such work could be legitimately influenced.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20344	Comment	Policy:	S 3	
154/26/27	Mr Bryan Craig			
Detail	The Local Plan needs to reflect that Cumbria CC and Carlisle City are working together to solve the problem of allocating large housing sites where there are insufficient school places.			
Response	The Local Plan is accompanied by a seperate Infrastructure Delivery Plan, the purpose of which is to understand the impacts of the proposed levels of growth within the Local Plan on a wide array of infrastructure provision, including education provision, and ultimately to detail how any gaps or pressures will be resolved. The City Council and County Council are committed to joint working through the process of the IDP to ensure that plans are in place, where needed, to secure the timely delivery of necessary infrastructure.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20706	Objection	Policy: S 3		
194	Michael Barry	Cumbria County Council		
Detail	<p>Background information given; suggested Change:  Delete the text stating: "If monitoring shows that a five year support of housing sites (+ 20%) is not being maintained, then the phasing of Carlisle South will be altered to bring it forward earlier than proposed".  After "other infrastructure" insert; "including highways and transport. Land required for the infrastructure to support growth here will be safeguarded from development".  In paragraph 3.38 state alter the text stating; "Currently all of the primary schools within Carlisle are at capacity" to read "Currently in parts of Carlisle, primary schools are at capacity".  Within the Policy, reference should be made to "green infrastructure" as one of the uses for this site. Within paragraphs 3.29 and 3.31 specific reference should be made to green infrastructure.  Within the paragraphs supporting this policy, under infrastructure reference should be made to the possible for a new highways infrastructure linking development to the south of the City.</p>			
Response	<p>Agreed that the text stating: "If monitoring shows that a five year support of housing sites (+ 20%) is not being maintained, then the phasing of Carlisle South will be altered to bring it forward earlier than proposed" should be deleted. This reflects that even if required, the site is unlikely to be available to address any shortfall in the early years of the plan period.</p> <p>Agreed that the policy should be amended to state after "other infrastructure"; "including highways and transport. Land required for the infrastructure to support growth here will be safeguarded from development".</p> <p>Agree that paragraph 3.38 should be amended as requested.</p> <p>Agree that reference should be made within the policy and supporting text (paras 3.29 and 3.31) to green infrastructure.</p> <p>Agree that reference should be made within the supporting text to possible new highways infrastructure linking development to the south of the City.</p>			
Proposed Change	Amend the policy and supporting text to reflect all of the required changes.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20178	Comment	Policy: S 3		
225	JR & JA Workman		Aoo8	
Detail	<p>Explicit support for the introduction of this strategic growth policy, which it is felt is much needed.</p> <p>Object/comment - the delivery of the Carlisle South growth area will, as the council states in the body of policy S3, be reliant upon a master plan approach, which it is envisaged will be approved as a development plan document.</p> <p>Notwithstanding the council's timing triggers for delivery of no later than 2025, it is considered that, due to the scale of the growth area, that preparatory work on the development of a master plan should be progressed without delay.</p> <p>Further, any such master planning exercise and subsequent development plan document should look to incorporate the broadly triangular area of land located between the railway and the M6 as shown on our enclosed master plan, which clearly demonstrates how this area of land (much of which is controlled by our client and readily deliverable) is a natural, very well contained and defensible urban extension to the southeast of Carlisle, offering deliverable and hence sustainable growth and, most importantly, key open space as an integral component to policy S3.</p> <p>We would therefore welcome the opportunity of discussing our considered thoughts with the council at the earliest opportunity.</p> <p>Suggest: Incorporation of the land located between the railway and the M6 within the scope of policy S3 and any subsequent master plan and development plan document.</p>			
Response	<p>Broad support for the identification of the broad location noted. It is agreed that work on masterplanning Carlisle South, including work to take forward the outcomes of this process through a formal planning process such as a further Local or perhaps Area Action Plan, should commence early in the plan period, to ensure that Carlisle South is deliverable when required in the later years of the plan period. Such work may also identify opportunities to release some phases earlier in the plan period, in the event that such a course of action is necessary to address under delivery or for other reasons, providing of course that doing so would not compromise the planned approach to the broader location or other allocations within the Plan. It would be through the process of masterplanning where consideration would be afforded to which sites could be brought forward as a component of the broad location and as such where the appropriate detailed boundaries and scale and nature of development would be established.</p>			
Proposed Change	<p>Amend Policy S3 to include a commitment to advancing masterplanning work for the broad location within the early years of the plan period.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20532	Comment	Policy: S 3		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>This policy states that development of this area will be in accordance with a Masterplan which will provide more detail on how the strategic requirements set out in the policy will be delivered; set a framework to guide the preparation of future planning applications and; provide a framework against which future planning applications will be assessed. It is intended that the Masterplan shall be a supplementary planning document.</p> <p>The Parish Council urges that work on the proposed Masterplan should be commenced early in the plan period. Early consultation and long term strategic planning will be essential in order to avoid conflicting proposals for land use, including the potential for seemingly innocuous early development to obstruct later ambition.</p>			
Response	<p>It is agreed that work on masterplanning Carlisle South, including work to take forward the outcomes of this process through a formal planning process such as a further Local or perhaps Area Action Plan, should commence early in the plan period. Not least such an approach is required to ensure that Carlisle South is deliverable when required in the later years of the plan period. Consequently it is considered that a commitment to this effect within Policy S3 would be an appropriate and beneficial addition.</p>			
Proposed Change	<p>Amend Policy S3 to include a commitment to advancing masterplanning work for the broad location within the early years of the plan period.</p>			
20305	Comment	Policy: S 3		
234	S Nicholson		Aoo8	
Detail	<p>Explicit support for the introduction of this strategic growth policy, which it is felt is much needed.</p> <p>Comment - the delivery of the Carlisle South growth area will, as the council states in the body of policy S3, be reliant upon a master plan approach, which it is envisaged will be approved as a development plan document.</p> <p>Notwithstanding the council's timing triggers for delivery of no later than 2025, it is considered that, due to the scale of the growth area, that preparatory work on the development of a master plan should be progressed without delay.</p> <p>Further, any such master planning exercise and subsequent development plan document should consider incorporating land off Newbiggin Road, Durdar, which is shown edged in red and blue on the submitted aerial photograph.</p>			
Response	<p>Broad support for the identification of the broad location noted. It is agreed that work on masterplanning Carlisle South, including work to take forward the outcomes of this process through a formal planning process such as a further Local or perhaps Area Action Plan, should commence early in the plan period, to ensure that Carlisle South is deliverable when required in the later years of the plan period. Such work may also identify opportunities to release some phases earlier in the plan period, in the event that such a course of action is necessary to address under delivery or for other reasons, providing of course that doing so would not compromise the planned approach to the broader location or other allocations within the Plan. It would be through the process of masterplanning where consideration would be afforded to which sites could be brought forward as a component of the broad location and as such where the appropriate detailed boundaries and scale and nature of development would be established.</p>			
Proposed Change	<p>Amend Policy S3 to include a commitment to advancing masterplanning work for the broad location within the early years of the plan period.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20251	Comment	Policy: S 3		
033	Matthew Good	Home Builders Federation		
Detail	The inclusion of this policy to bolster growth is generally supported. The policy does, however, seek to phase this site to deliver from 2025 onwards. Given the increased need for housing within Carlisle and the under-delivery in recent years it is recommended that the Council seek to deliver sites within this area earlier in the plan period. This will provide greater opportunities to ensure delivery of the overall plan requirements.			
Response	General support noted. It is agreed that work on masterplanning Carlisle South, including work to take forward the outcomes of this process through a formal planning process such as a further Local or perhaps Area Action Plan, should commence early in the plan period, to ensure that Carlisle South is deliverable when required in the later years of the plan period. Such work may also identify opportunities to release some phases earlier in the plan period, in the event that such a course of action is necessary to address under delivery or for other reasons, providing of course that doing so would not compromise the planned approach to the broader location.			
Proposed Change	Amend Policy S3 to include a commitment to advancing masterplanning work for the broad location within the early years of the plan period.			
20317	Comment	Policy: S 3		
062		Church Commissioners for England	A013	
Detail	<p>We note the intention of Policy S3 to focus growth in the south of Carlisle, with this urban extension phased for delivery from 2025 onwards. This direction for growth is in line with the development of the Commissioners' site at South Morton which is the subject of an existing implemented planning consent (reference 09/0413). We believe that development of the South Morton site, sitting as it does at the heart of the South Morton Masterplan area, will serve to act as a catalyst for growth in the south-west of Carlisle.</p> <p>We would, however, have concerns in the event that individual sites in Carlisle South (in addition to those which are already subject to individual allocations within the plan) come forward prior to 2025, if, as is suggested, the Council fail to maintain a 5 year supply (plus 20%) of housing sites. Should these sites come forward before 2025, they could prejudice the delivery of the Commissioners' site, as well as raising infrastructure capacity concerns. We do note, however, that paragraph 3.21 states that – "It would prejudice the strategy of the Plan if individual sites within the Carlisle South area came forward incrementally within the first 10 years of the Plan period. It would also prejudice the delivery of infrastructure." As such, while welcoming the broad direction of growth set out in this policy, the Commissioners would urge that applications being submitted within the first 10 years of the Plan period in the south of Carlisle are viewed to be premature on the basis that the planned delivery of existing sites benefiting from existing planning permissions or proposed land allocations could well be put at risk.</p>			
Response	Comments and broad support noted. It is agreed that it is appropriate for the Plan to include sufficient safeguards so as to avoid the delivery of allocated sites being unnecessarily prejudiced through the premature release of Carlisle South or indeed windfall sites.			
Proposed Change	Consideration will be afforded when refining the Plan to strengthening the necessary safeguards.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20631	Comment	Policy: S 3	33	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The Council has confirmed that this is not an allocation.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting.</p> <p>Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of any heritage assets and their setting.</p> <p>Consequently, before allocating any site, there would need to be some evaluation of the impact which the development might have upon those elements that contribute to the significance of heritage asset and their setting.</p>			
Response	<p>Policy S3 makes clear that the development of Carlisle South as a broad location would be governed by future masterplanning work, and it would be through this process where consideration would be afforded to where the appropriate detailed boundaries and scale and nature of development would be established. The significance of heritage assets and any potential impacts on these, or opportunities, would be considered as a key element of this future work, alongside other suitability/sustainability considerations.</p>			
Proposed Change	<p>No change considered necessary.</p>			
20343	Objection	Policy: S 3	3.21 & 3.31	33 & 35
154/26/27	Mr Bryan Craig			
Detail	<p>Page 33 paragraph 3.21: We seem to be falling down on infrastructure planning as can now be seen with the Morton Master plan as can be seen from the recent road closures.</p> <p>There is a need for a properly developed Infrastructure Master plan and an Infrastructure Schedule covering all larger developments.</p> <p>Page 35 paragraph 3.31: This paragraph is incomplete.</p>			
Response	<p>Noted. The Local Plan is accompanied by an Infrastructure Delivery Plan, the purpose of which is to set out the infrastructure required to support future growth, as well as acting as the mechanism through which to co-ordinate the timely delivery of critical infrastructure with key partners. The IDP is being developed with the full engagement of a wide array of Infrastructure providers. Significantly large developments, including the proposed Carlisle South Urban Extension, will be supported through the development of Infrastructure Schedules as part of the on-going work on the Infrastructure Delivery Plan.</p>			
Proposed Change	<p>No change considered necessary.</p>			

RepNo	Status			Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact			Organisation	Agent	
20591	Comment	Policy:	S 3	3.21 & 3.38	33 & 36	
196	Mrs S Tarrant			Clerk to Cummersdale Parish Coun		
Detail	Para 3.21: Phasing of Carlisle South will be altered to bring it forward earlier then proposed. Infrastructure delivery would be prejudiced if it was to be brought forward. The developments on the Carlisle South should not be brought forward until there is a properly developed Infrastructure Master plan and an Infrastructure Schedule covering all larger developments					
Response	Para 3.38: It mentions a strategic allocation but does not indicate how this can be achieved. The District council should not allow development in areas at capacity without ensuring the provision of education With further development planned for Garden Village and the other housing allocations other than the Morton development – added together would 678 homes and the reference is made to larger secondary school close by which will be at capacity in 2020 Primary school provision currently at capacity. The response – That's County Councils responsibility should not be accepted.					
	The local plan should include the strategy in partnership with CCC for the delivery of education provision throughout the plan to 2030.					
Proposed Change	The Local Plan is accompanied by a separate Infrastructure Delivery Plan, the purpose of which is to understand the impacts of the proposed levels of growth within the Local Plan on a wide array of infrastructure provision, including education provision, and ultimately to detail how any gaps or pressures will be resolved. The IDP is being developed with the full engagement of a wide array of Infrastructure providers, including the County Council, who are committed to joint working through the process of the IDP to ensure that plans are in place, where needed, to secure the timely delivery of necessary infrastructure. Significantly large developments, including the propped Carlisle South Urban Extension, will be supported through the development of Infrastructure Schedules as part of the on-going work on the Infrastructure Delivery Plan.					
	No change considered necessary.					
20699	Objection	Policy:	S 3	3.36 - 3.37	36	
095	Sabaa Ajaz			United Utilities		
Detail	Delete paragraphs 3.36 and 3.37 and replace with: "In some circumstances, it may be necessary to coordinate the delivery of new development with the delivery of future infrastructure. United Utilities' requests developers / landowners engage with infrastructure providers at an early stage to understand the impact of development on existing infrastructure with details of their drainage strategy for development sites. United Utilities requests developers produce drainage strategies for each phase of development in agreement with the LPA, United Utilities and the Environment Agency. It is prudent that developers and landowners keep United Utilities informed of realistic and achievable delivery timescales for development and approach infrastructure in a coordinated manner. It will be necessary to ensure drainage infrastructure is delivered in a holistic and co-ordinated manner as part of an overall strategy between phases of development and between developers. The delivery of development as part of an overall strategy and the early receipt of details allows the impact of development on infrastructure to be determined with improved accuracy."					
Response	The wording of paras 3.36 and 3.37 largely reflect the preferred options stage of the Plan and would have been amended in any event within the publication draft of the Local Plan. Notwithstanding this the suggested text is helpful and will be used to meaningfully inform the revised context of the paragraphs in question.					
Proposed Change	Use the suggested text to meaningfully inform revisions to paras 3.36 and 3.37.					

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20562	Comment	Policy: S 3	3.37 & 3.38	36
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	3.37: All agreed a new pipe line would be preferable to a villages such as Great Corby & Wetheral- The City Council should be more insistent			
	3.38: The Plan does not mention how strategic allocation can be achieved. The District council should not allow development in areas at capacity e.g. Scotby/Wetheral without ensuring the provision of education. The response – that it is County Council’s responsibility should not be accepted. The local plan should include the strategy in partnership with CCC for the delivery of education provision throughout the plan to 2030. There should be a standard approach, lack of education facilities should be part of the planning consideration, before planning approval is granted, this should be looked at.			
Response	The Local Plan is accompanied by a separate Infrastructure Delivery Plan, the purpose of which is to understand the impacts of the proposed levels of growth within the Local Plan on a wide array of infrastructure provision, including utilities and education provision, and ultimately to detail how any gaps or pressures will be resolved. The IDP is being developed with the full engagement of a wide array of Infrastructure providers, including United Utilities and the County Council, who are committed to joint working through the process of the IDP to ensure that plans are in place, where needed, to secure the timely delivery of necessary infrastructure. Significantly large developments, including the propsoed Carlisle South Urban Extension, will be supported through the development of Infrastructure Schedules as part of the on-going work on the Infrastructure Delivery Plan and/or through subsequent and more detailed masterplanning work.			
Proposed Change	No change considered necessary.			
20318	Support	Policy: S 4		
062		Church Commissioners for England	A013	
Detail	As it is considered to be in accordance with Core Principle 7 of the NPPF, we support Policy S4 as good design is essential to ensure that development complements and enhances the existing environment whilst utilising a site to help address development needs and demands. As set out in the NPPG, achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. It is vital, however, that schemes remain deliverable and that the Council does not place too many onerous requirements on a scheme when assessing a proposal for development.			
Response	Support noted.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20533	Comment	Policy: S 4		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>The Parish Council welcomes the inclusion of reference to 'historic street patterns'; 'safety' and; the avoidance of 'visual cluttering' and the requirement for materials to 'reinforce local distinctiveness'. However; in the interests of sustainability it would be appropriate to retain reference to the use of locally sourced materials. Whilst the policy should not, of course, demand the local sourcing of materials; it should however be supportive of the local economy through 'encouraging' their use. A specific reference to vernacular aspects of design would be particularly useful in ensuring that proposals, especially those in some rural and conservation areas, remain contextually harmonised, through respecting their setting and its heritage by means of quality design, as exemplified by The Lanes frontage and Carlyle's Court.</p>			
Response	<p>Support for retention of the specific elements of the policy noted. The policy is intended as a strategic but nevertheless generic design policy and in this regard is considered to already constitute an adequate framework which will ensure that local character and distinctiveness, whether polite or vernacular in style, will be key attributes at the fore of decision making. In the absence of any evidence to support the range and volumes of available local materials, and through recognition of the free market and choice within it, it is not considered that the policy can insist nor advocate using locally sourced materials.</p>			
Proposed Change	No change considered necessary.			
20229	Objection	Policy: S 4		
088	Elizabeth Allnutt	Save Our Streets		
Detail	There needs to be reference here to Conservation Areas.			
Response	The policy is to be amended, following representations by English Heritage, to include reference to 'the historic environment' which will encompass conservation areas.			
Proposed Change	No change considered necessary.			
20504 E2	Comment	Policy: S 4		
158/33	Mrs Julie Templeton			
Detail	<p>Conservation Areas should be included in this policy. Request: A policy</p>			
Response	<p>Conservation areas are already the subject of their own policy (Policy 56) within the Historic Environment chapter of the Plan. Consequently it is not considered that reference to Conservation Areas need to be or would add value to Policy S4.</p>			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20152	Support	Policy: S 4		
223		Taylor Wimpey UK Limited	Ao26	
Detail	Taylor Wimpey UK Limited broadly supports the Policy S4 criteria with regards to protecting residential amenity, reinforcing local architecture, and providing mitigation for the loss of ecological features.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20707	Objection	Policy: S 4		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0986 to which amendments were made. Aditional comments made. Suggested Changes:</p> <p>The second sentence of Criteria 10 to this policy should be amended to state; "When agreed by Highways Authority, the reinstatement of existing traditional materials will also be sought, following repairs to roads, pavements, kerbs and underground services".</p> <p>It is proposed that Criteria 6 is revised to state: "aim to ensure the retention and enhancement of existing trees, shrubs, hedges and other wildlife habitats through avoidance, including alternative design. If environmental features cannot be avoided, appropriate mitigation measures should be put in place and on-site replacement of those features will be sought".</p> <p>It is proposed that the policy would contain an additional criteria. This stating: "ensure that developments can be accessed by those with disability".</p>			
Response	Criteria 6 and 10 will be amended as suggested. A reference to accessibility will be added to criterion 4, therefor mitigating the need for an additional stand alone criterion.			
Proposed Change	Amend criteria 6 and 10 as suggested. Amend criterion 4 to instead read "...landscaping are visually attractive, accessible and safe and well related...".			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20045	Comment	Policy: S 4		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			
20632	Objection	Policy: S 4	39	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The outcome of the previous consultation (which is highlighted in the Plan) regarding the importance of local character informing new development and the need to reinforce local distinctiveness is very important. Although, we welcome the content of this policy, the Plan does not define the local character and distinctiveness of the District to inform this policy.</p> <p>The Plan needs to be expanded to detail the character and distinctiveness of the District of Carlisle and the contribution it makes to the area.</p>			
Response	The policy is intended as a strategic but nevertheless generic design policy and in this regard is considered to already constitute an adequate framework which will ensure that local character and distinctiveness will be key attributes at the fore of decision making. It must be recognised that the District is extensive in size and varies in its character throughout. Consequently the approach adopted is considered more appropriate and practical and therefore preferable to a more prescriptive approach which in the circumstances would be unlikely to work.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20345	Objection	Policy: S 4	39	
154/26/27	Mr Bryan Craig			
Detail	Remove 'and' at the end of paragraph 9 and start all sentences with capitals to be consistent			
Response	Comments noted.			
Proposed Change	Ensure a consistent approach to formatting in future drafts.			
20633	Objection	Policy: S 4	39	
104	Emily Hrycan	English Heritage North West		
Detail	Give the comprehensive nature of this policy and the significance of the historic environment in Carlisle, a bullet point should be introduced to ensure that reference is made to the historic environment.			
	An additional bullet should be inserted to read "take into consideration the historic environment including both designated and undesignated assets".			
Response	It is agreed that an additional bullet point should be added as suggested.			
Proposed Change	Insert an additional bullet point to read "take into consideration the historic environment including both designated and undesignated assets and their settings".			
20046	Comment	Policy: S 5		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20319	Comment	Policy: S 5		
062		Church Commissioners for England	A013	
Detail	<p>Flexibility is required with regard to developer contributions to ensure that a scheme remains viable following potential Section 106 agreements and / or CIL requirements. The Council must assess each scheme on their individual merits to ensure development can and will take place, without placing too much financial strain on a site that may lead to it becoming undeliverable. This flexibility should therefore be included within Policy S5 and its supporting text.</p> <p>Moreover, there is significant concern regarding the 'Local Green Space' element of the policy. The policy currently states that local communities have the opportunity to designate high valued areas as 'Local Green Space'. The Council need to ensure that this does not become a way for local residents to obstruct much needed development throughout the district. It is therefore suggested that further clarification on this matter should be included within the policy, in addition to the text which is already set out at paragraph 3.59.</p>			
Response	<p>Noted. These concerns are addressed within the developers contribution policy, which states clearly that contributions - either as CIL/S106 - must not be excessive to the point that the jeopardise the viability of a development. This is also reflected in the NPPF. Repetition of that in this policy is not considered to be necessary.</p> <p>Regarding Local Green Space - this designation is introduced within the NPPF, and as such is supported by the Local Plan. Your concerns are valid, however, and the Local Plan recognises this, hence it states clearly that these designations cannot be used simply to block development. It also states that they cannot be used to designate vast swathes of land in the hope of creating mini-greenbelts, and that communities must be able to demonstrate the alledged community value of the land they wish to designate. No further change to the policy is required.</p>			
Proposed Change	No change			
20708	Objection	Policy: S 5		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0987 to which amendments were made. Expanded comments made. Suggested Changes: Reference to "stepping stones" is added to Criteria 3 of this policy.</p>			
Response	Noted. These criteria have now moved to a more development management focused policy. This suggested change will be added to them.			
Proposed Change	Add "stepping stones" to the criteria within the new Delivering Green Infrastructure policy.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20246	Objection	Policy: S 5		
033	Matthew Good	Home Builders Federation		
Detail	The HBF still considers Rep No 0060 - former Policy S4 Green Infrastructure still to be valid.			
Response	Response remains as original response to rep no. 0060: Disagree. The Local Plan should be read as a whole. Other policies, including the Delivery of Infrastructure and Planning Obligations policy detail how and when contributions from developers will be sought. Further detail is also provided in the Open Space policy regarding sports pitches and other open space. This policy outlines the strategic direction the Council wishes to take with regard to Green Infrastructure and the steps it expects developers to take to protect and enhance GI assets through the development process.			
Proposed Change	No change			
20230	Objection	Policy: S 5		
088	Elizabeth Allnutt	Save Our Streets		
Detail	There needs to be reference here to CIL or alternative methods of funding for provision and maintenance of public greenspaces.			
Response	Agreed. This will be mentioned in the justification.			
Proposed Change	Add mention to CIL to secure funding for maintenance of green spaces.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20225	Objection	Policy:	S 5	
o89	Elizabeth Allnutt	National Allotments Society		
Detail	<p>Although it has been noted in the comments from the First Stage preferred options, no action has been taken to include allotments as a separate policy on their own. The comments made for the First Stage consultation are therefore still valid and reiterated here.</p> <p>Allotment site information on the map is still inadequate and incomplete. There are omissions in the urban area. New sites in the rural areas have also been left off.</p> <p>"Allotment Disposal Guidance: Safeguards and alternatives" was published by the Department for Communities and Local Government in January 2014. It is available on their website – <a href="http://www.gov.uk/dclg">www.gov.uk/dclg</a>. This deals with the disposal criteria which councils must follow when proposing the disposal of statutory allotment land. It is clear that there is an expectation that allotments will be covered by their own policy in Local Plans.</p> <p>Paragraph 3.1 describes the four policy criteria for disposal. It also states as one of the criteria for disposal:</p> <p>"The implications of disposal for other relevant policies, in particular local plan policies, have been taken into account".</p> <p>If a Local Plan has a distinct, clear policy on allotments which recognises their value to the community and the environment, alongside their statutory protection, then the sites should be afforded further protection.</p> <p>The emphasis in the NPPF is to encourage and remove obstacles to development. Allotment sites are usually situated on the periphery of city centres and are therefore vulnerable to development. For example, Farm Terrace allotments, Watford where a judicial review has been sought to oppose regeneration plans for housing attached to a hospital development on the statutory allotment site. Situations such as this indicate that statutory allotment protection needs to be supported by robust Local Plan policies.</p> <p>The DCLG Guidance continues. Under the heading "How does a council show that "the implications of disposal for other relevant policies, in particular local plan policies, have been taken into account"?</p> <p>"3.10 The criterion looks to assess any contradictions between the council's intention to dispose of allotment land and other council policies, particularly in local or neighbourhood plans."</p> <p>The inclusion of a separate distinct policy on allotments in the CDLP would clearly demonstrate a contradiction between the Council's wish to retain allotments and a wish to dispose of them for development and should therefore be included</p> <p>"3.11 The Secretary of State will consider the following when seeking to establish whether or not councils have met this criterion:</p> <ul style="list-style-type: none"> <li>- Copy of the local or neighbourhood plans where the allotment site to be disposed of is identified in the plan. Councils should highlight the relevant section of the plan.</li> <li>- Copy of any other council or national government policies which may be affected by, or influence the decision to seek disposal of the allotment land. Councils should highlight the relevant sections."</li> </ul> <p>Guidance from DCLG makes it clear that local authorities are expected to include robust allotment policies, including information on the map. In the CDLP allotments only feature incidentally as part of other leisure and/or health considerations.</p> <p>The DCLG Guidance is even-handed in that it allows for opposing policies to be considered equally; protection of allotments v development (eg housing). The absence of a separate allotment policy in the CDLP would make it very difficult to assess the benefits of allotment sites as opposed to development in Carlisle and District and would favour economic development over community and environmental benefits. This indicates that the principles of sustainable development are not being followed. The inclusion of a robust allotment policy is essential for sustainable development as it would help to prevent piecemeal development of allotment sites and the resulting loss of community and environmental amenities.</p>			
Response	Noted. It is considered that the Open Space policy, which looks at protecting all types of open space, including allotments, community gardens and orchards, is sufficient. A stand alone policy for allotments would probably simply repeat the words in the open space policy that seeks to manage and protect open space use. No change.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20306	Support	Policy: S 5		
096	Rob Naples	Northumberland County Council		
Detail	Further to our comments on the previous Preferred Options consultation, we welcome the inclusion of the reference within the policy to the fact that the Council will continue to work with neighbouring authorities and other partners to ensure that green infrastructure assets which cross authority borders are protected and enhanced through a comprehensive and connected policy approach.			
Response	Support noted.			
Proposed Change	No change considered necessary.			
20346	Comment	Policy: S 5	41	
154/26/27	Mr Bryan Craig			
Detail	Start all sentences with capitals to be consistent.			
Response	Agreed - grammatical errors will be corrected.			
Proposed Change	Correct grammar of policy to ensure all sentences start with a capital letter.			
20563	Objection	Policy: S 5	42	
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Local green space to be designated around the villages to protect the open space.			
Response	Disagree. This would be impractical and inappropriate. Villages need to grow, and often this growth needs to be on the edge of villages. To blanket protect this land, without considering its capacity to support development on its own merit, i.e. Case by case, would run contrary to the NPPF, and particularly contrary to the Local Green Space policy, which seeks to avoid exactly this.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20592	Comment	Policy: S 5	42	
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	Local green space – designate areas around Cummersdale to protect the recreation and open space.- The Copse and land to Dalston Road from Cummersdale Village should be designated as local green space ; these areas rich in wild life and tranquil. Development should not be allowed to absorb the footpaths and bride paths.			
Response	Disagree. This would be impractical and inappropriate. Villages need to grow, and often this growth needs to be on the edge of villages. To blanket protect this land, without considering its capacity to support development on its own merit, i.e. Case by case, would run contrary to the NPPF, and particularly contrary to the Local Green Space policy, which seeks to avoid the blanket application of this designation to broad areas of land that could lead to the creation of a mini-green belt.			
	The Council will, however, consider applications from Parish Councils and other community groups for smaller areas, with clearly defined boundaries and clearly demonstrable community value.			
Proposed Change	No change			
20534	Comment	Policy: S 5	3.66	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	The Parish welcomes the inclusion or a requirement that where development results in damage to a green infrastructure asset any replacement or mitigation measure will be expected be deployed as closely as possible to the affected asset. New paragraph 3.66 is also welcomed as an essential protective measure in ensuring the survival, for possible future use, of irreplaceable routes for potential future transport infrastructure. However development too closely adjacent to these routes, though not actually of them, may ultimately preclude their restoration and use. The strategic protection afforded by paragraph 3.66 should therefore be greatly enhanced by a provision requiring the 'protective buffering' of these routes.			
Response	Agreed - mention of a protective buffer around railway lines will be included in the supporting text. This will be set at 8m either side, in line with the buffers that the Environment Agency seek to enforce around main rivers and water ways.			
Proposed Change	Include mention of protected buffer around disused railway lines.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20047	Comment	Policy: S 6		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			
20320	Comment	Policy: S 6		
062		Church Commissioners for England	Ao13	
Detail	Although we accept that delivering development on previously-developed land and within town centre regeneration sites is important, it is essential for the Local Plan to ensure that these sites are viable. Where this is not possible, alternative sites need to be identified to ensure that the Plan is realistic and the sites are truly deliverable. The NPPG states, at paragraph 005 (Reference ID: 10-005-20140306) of the Viability Guidance – Viability and Plan Making - that "Viability assessment should be considered as a tool that can assist with the development of plans and plan policies. It should not compromise the quality of development but should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable".			
Response	Comments noted. The development of the plan is being supported by a plan wide viability study, the purpose of which is to assess and understand the cumulative impact on development viability of the policies within the Local Plan, in order to ensure that such requirements are appropriate and that they do not constitute a financial burden.			
Proposed Change	No change considered necessary.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20231	Objection	Policy: S 6		
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>While it has been useful to see the CCMP as part of the consultation process for the Local Plan there are still many issues which are unresolved which relate both to its content and its relation to the Local Plan. SOS has already commented on the CCMP.</p> <ul style="list-style-type: none"> <li>- Has CCMP changed as a result of the consultation process? Is there a revised version? Can it be available to the public?</li> <li>- What is the relationship of the comments on the CCMP to the consultation process for the Local Plan? And vice versa.</li> <li>- What is the sequence of publication for the two documents?</li> </ul> <p>There is a lack of reference here to sustainability. There is plenty of emphasis on economic development but no reference made to the social and environmental aspects of sustainable development. The City Centre functions as a centre for the entire community of the city – not just retail. It is also dominated by hard landscaping and a reference to the importance of trees, flower beds and other softening and enhancing features and the role they play in quality of life for residents and visitors needs referencing.</p> <p>Reference needs to be made to the fact that the entire City Centre retail area is covered by a Conservation Area. Point ii in the box refers only to Portland Square/Chatsworth Square.</p> <p>Recent proposed initiatives by the County Council to install on street pay parking in streets where shoppers park will discourage shoppers from using the city centre and would seem to be in direct conflict with City Council Local Plan policies to support the city centre retail area. A greater degree of cooperation would be expected.</p>			
Response	<p>The City Centre Masterplan (CCMP) comprises evidence which will be used to inform the preparation of the Local Plan. The City Council will be consulting on a further version of the CCMP in the Summer (2014). The report which accompanies the CCMP will make clear how responses to the first stage of consultation on it have influenced its evolution. Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p> <p>The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to explicitly refer to sustainability within each of the Plans policies. In the context of Policy S6 for example the focus of the Policy is on strategic retail matters. In response to concerns about the landscaping of the city centre, it is considered appropriate to amend point (i) to make explicit reference to soft landscaping as one element of the public realm.</p> <p>The policy as drafted already refers to the City Centre and Portland Square/Chatsworth Square conservation areas.</p> <p>Whilst a key objective of the Plan is to maintain and enhance the vitality and viability of the City Centre, the traffic management measures referred to are matters beyond the scope of the Local Plan.</p>			
Proposed Change	Amend the first bullet point of the policy to instead refer to "enhancements to the public realm, including appropriate and imaginative hard and soft landscaping".			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20255	Support	Policy: S 6		
098		Sainsbury's Supermarkets Ltd	A015	
Detail	On behalf of our client Sainsbury's Supermarket's Ltd, we have reviewed the draft of the Carlisle District Plan – Preferred Options Stage 2 and would like to take this opportunity to state that representations submitted against policies during the Preferred Options Stage 1 consultation (September 2013) are maintained and should be fully considered in preparation of the Publication draft. Representation No 0435 (was S5)			
Response	Reiteration of previously expressed support for this policy noted.			
Proposed Change	No change considered necessary.			
20635	Objection	Policy: S 6		
104	Emily Hrycan	English Heritage North West		
Detail	The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. An additional bullet point should be inserted to ensure that the large number of designated heritage assets within the City Centre are conserved and enhanced and it should detail in particular ones that are of importance for this policy. The NPPF requires that strategic policies should detail how it can be applied locally. The suggested amendment can further enhance this policy.			
	An additional bullet point should be inserted: "conservation and enhancement of the City's heritage assets including.....(list Council's priorities)"			
Response	Whilst it is considered such an addition to the Plan would be beneficial, it is considered that the suggested text would more logically be incorporated within a stand alone strategic heritage policy. This latter policy would, along with other policies of relevance within the Local Plan, operate alongside Policy S6.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20637	Objection	Policy: S 6		
104	Emily Hrycan	English Heritage North West		
Detail	<p>The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the justification of the allocations of land for development. Whilst the principle of some form of development may be acceptable. The Citadel is Grade I listed and the Train Station is Grade II*.</p> <p>There are also a number of other significant heritage assets which have not been mentioned here.</p> <p>No assessment or reference to the historic environment (including both designated and nondesignated assets) or local character and context has been made in the designation of these sites or in their justification.</p> <p>In particular, the policy appears to put forward the type of development to be acceptable without any assessment undertaken to determine this. This needs to have been undertaken prior to the allocation of this site for development.</p> <p>The Plan should be expanded to include reference to the historic environment in considering the impact of allocating sites for development.</p> <p>There needs to be an assessment of the sites to underpin the allocations before the acceptability of any sites put forward can be considered appropriate. In particular, the potential impacts upon those elements, which contribute towards the significance of the heritage assets in the vicinity.</p> <p>Where the proposals are likely to have a harmful impact upon the significance of those assets, the Plan needs to set out the measures by which it is proposed that the harm will be mitigated.</p> <p>In line with the requirements of NPPF Paragraph 137, consideration should also be given to opportunities, which might enhance or better reveal the significance of any heritage assets.</p> <p>If it is not possible to reduce the harm to the significance of an asset, then an assessment needs to be undertaken of those elements of the scheme against the tests set out in Paragraphs 132 or 133 of the NPPF.</p>			
Response	<p>Comments noted. It will be the City Centre Masterplan which ultimately informs which sites will be identified and allocated within the Local Plan as the preferred option(s) to meet future retail and leisure needs across the plan period, and this process has had regard to the constraints and opportunities presented by the historic environment. The City Council will be consulting on a further version of the CCMP in the Summer (2014). Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p>			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20289	Support	Policy: S 6		
106		North Associates	A018	
Detail	The Lowther Street Car Park has been long regarded as an appropriate location for further retail development. It is identified as such under the current Development Plan policy EC22. The identification of the site for such purposes under the terms of policy S6 is welcomed. Detailed pre application discussions regarding the development of the site have been undertaken with both the Planning and Highway authorities. The landowner's representatives have agreed terms with a developer interested in bringing the site forward and with retailers keen to be represented in the City.			
Response	Support noted. It must be acknowledged however that the eventual strategic retail allocations to be taken forward by the Plan will be informed by the City Centre Master Plan, which is to be published for consultation separately during the Summer of 2014. Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20551	Comment	Policy: S 6		
270		Carlisle Shopping Centre Ltd	Ao28	
Detail	<p>Policy S6 is the key retailing policy in the context of the City Centre and future growth. In order to ensure that Carlisle remains competitive with a high level of expenditure given its largely isolated location with the opportunity to serve a large rural population, the development of city centre sites is being considered by the Council in the form of a City Centre Masterplan. We fully support the proposal to prepare a City Centre Master Plan which we understand will follow the progress of the Local Plan. The City Centre Masterplan will be informed by the Carlisle Retail Study 2012 which confirms that there is limited requirement to increase retail floorspace in Carlisle City Centre however it is understood that the Council are exploring options to meet the requirements in the latter part of the Plan period. We support the principle of growth within the City Centre and it has been established in previous discussions between our Client and the Council that our Client could be in a position to deliver an extension to The Lanes Shopping Centre on the Lowther Street Car Park site. As such, we fully support the proposed allocation of this site.</p> <p>Our Client is fully committed to investing in Carlisle, and to this end has commenced discussions with a number of retailers to determine the interest in the possible increase in available floorspace, attracting new retailers that do not have an existing presence in the City. It is also important to note that some retailers already represented within the city occupy accommodation that does not fully suit there current trading styles and does not allow them to carry their full range of lines. The relocation or extension of these retailer's stores will enable them to offer their full ranges and negate the need for shoppers to travel further a field for a full range store. Our Client's managing agents have identified market demand in Carlisle, as consistent with the Carlisle Retail Study 2012 and are proceeding with their discussions and plans on this basis.</p> <p>Initial design feasibility exercises have established that approximately 150,000 square foot of retail floorspace could be accommodated on the Lowther Street Car Park site as an extension to The Lanes, with additional leisure and restaurant floorspace over 3 floors and additional car parking to enhance the provision of existing facilities in Carlisle.</p> <p>We consider that in order to formalise the commitment to the extension of The Lanes on behalf of the Council and our Client, the allocation of Lowther Street Car Park should be linked directly to The Lanes, alongside the potential floorspace that could be delivered in such an extension. We therefore recommend that the allocation should be extended to adjoin the Lanes and that the wording of this policy is amended to state:</p> <p>"Lowther Street Car Park to be developed as an extension to The Lanes to deliver approximately 150,000 square metres of retail floorspace alongside leisure facilities and additional car parking."</p> <p>The re-wording of this policy in this way would create greater certainty in terms of the direction for retail growth in Carlisle, and the commitment to the expansion of The Lanes to accommodate future retail requirements for the benefit of the City Centre and the wider sub-region.</p> <p>We object to the strategic allocation of the Caldew Riverside site and question its deliverability and the timeframes within which to deliver. The proposals to allocate this edge of centre site would have a negative impact on the Town Centre and this should be eliminated where possible. Any development on this site will create a two destination centre which is impossible to link due to the extreme topography between it and the existing city centre. We also strongly believe that the highways problems any development on this site would generate would outweigh any benefit for the city.</p>			
Response	<p>Support for the City Centre Masterplan (CCMP) process noted.</p> <p>Whilst support for the identification of the Lowther Street Car Park site within the Plan is noted (as well as the call for its relationship with the Lanes to be strengthened), and conversely concerns expressed with regards to Caldew Riverside noted, it must be acknowledged that ultimately it will be the City Centre Masterplan which informs which sites will be identified and allocated within the Plan as the preferred option(s) to meet future retail and leisure needs across the plan period. The City Council will be consulting on a further version of the CCMP in the Summer (2014). Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p>			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20505 E2	Comment	Policy:	S 6	
158/33	Mrs Julie Templeton			
Detail	The City Centre Masterplan has not published their response to the first consultation. It is unclear if any changes have been made as a result of this. Is the revised version going to be made available to the public? Request: A policy			
Response	The City Centre Master Plan was not completed in time, and therefore not available, to inform the Preferred Options Stage Two draft of the Local Plan. The City Council will be consulting on a further version of the CCMP in the Summer (2014). The report which accompanies the CCMP will make clear how responses to the first stage of consultation on it have influenced its evolution. Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.			
Proposed Change	No change considered necessary.			
20709	Objection	Policy:	S 6	
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 0988 to which no amendments were made. New comments submitted. Suggested Changes: There should be explicit reference to the need for the parking, vehicular and pedestrian implications of the proposed developments to be fully considered in order to ensure the effects of development are fully understood and sufficient infrastructure can be delivered.  With respect to the Citadel area, explicit reference to public realm improvements should be removed. The last sentence of the first paragraph of the part of the policy concerning the Citadel area should be revised to state: "Carlisle Station is a key gateway to the City for tourist and business users. Improvements to Carlisle Station are required to respond to forecast growth in rail use and to visitor experience through enhanced facilities and excellent links to public transport and car-parking"  Within the policy possible uses could be extended to education, arts, culture and tourism and visitor accommodation. There may be benefit in acknowledging the potential role an element of residential development and ancillary car parking as part of the mix of uses on the site.  The policy references to the Caldew Riverside site should make references to the possibility of some additional housing on the site as part of the mix of uses to be proposed.			
Response	Concur that there is a need for the addition of a reference to this effect, to apply to specific proposals as these are brought forward.			
Proposed Change	Include a similar reference to that suggested within the revised Policy S6.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20634	Objection	Policy: S 6	45	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The NPPF requires that Plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>No assessment has been made in the Plan of the historic retail core of Carlisle City Centre. A requirement of the NPPF is that a proper assessment of the significance of heritage assets in the area needs to have been made. Carlisle City Centre is covered by various conservation areas and many designated heritage assets, yet there is no mention of these (earlier on) in the Plan. There should be a specific section on Carlisle itself. It is an important part of the City's heritage.</p> <p>The policy proposes specific criterion that should be adhered to when development proposals are put forward. However, these need to be properly justified including reference to these within conservation area appraisals and management plans.</p> <p>The Plan should be expanded to include a description of the conservation areas and historic retail environment in Carlisle City Centre and an assessment made of the character and the contribution it makes to the City.</p> <p>The Council should be undertaking conservation area appraisals to inform this part of the Plan.</p>			
Response	<p>It is accepted that the spatial portrait of the plan could be strengthened to more explicitly acknowledge the heritage value of the the historic core of the City. Policy S6 already includes reference to the need for proposals to preserve and enhance the two central conservation areas within the City, but it is recognised that this could be elaborated to include reference to other heritage assets. It will be the City Centre Masterplan which ultimately informs which sites will be identified and allocated within the Local Plan as the preferred option(s) to meet future retail and leisure needs across the plan period, and this process has had regard to the constraints and opportunities presented by the historic environment. The City Council will be consulting on a further version of the CCMP in the Summer (2014). Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p>			
Proposed Change	<p>Expand the spatial portrait at the outset of the Plan to more explicitly acknowledge the heritage value of the the historic core of the City and the contribution this makes.</p> <p>Amend the second bullet point within Policy S6 to instead refer to the "preservation and enhancement of the character, appearance and wider setting of the City Centre and Portland Square/Chatsworth Square conservation areas and the individual heritage assets within".</p>			
20347	Objection	Policy: S 6	45	
154/26/27	Mr Bryan Craig			
Detail	<p>We use the word 'regeneration' but there is no mention of the difficulties experienced by potential shoppers due to lack of parking and a do nothing option will lead to a steady decline in retail activity. (Multi-story Car Park on Lower Viaduct with high level link to West Walls). Start all sentences with capitals to be consistent</p>			
Response	<p>The City Centre Masterplan is to include proposals for additional car parking where considered necessary to support proposals for additional retail and leisure floorspace within the City Centre. The Council will also continue to work jointly with the County Council in their capacity as the local highway authority with regards to an appropriate car parking strategy for the City.</p>			
Proposed Change	<p>No change considered necessary.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20636	Objection	Policy: S 6	46	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of any heritage assets and their setting.</p> <p>Consequently, before allocating any site there would need to be some evaluation of the impact which the development might have upon those elements that contribute to the significance of heritage assets and their setting.</p> <p>This will need to be undertaken prior to these sites being taken forward to the next stage of the Plan and be part of the evidence base.</p> <p>Any proposals affecting a conservation area will need to ensure that there is an up-to-date conservation area appraisal. This should be part of the evidence base.</p> <p>The Plan should be expanded to include reference to the historic environment in considering the impact of allocating sites for development. There needs to be an assessment of the sites to underpin the allocations before the acceptability of any sites put forward can be considered appropriate. In particular, the potential impacts upon those elements, which contribute towards the significance of the heritage assets in the vicinity.</p> <p>Where the proposals are likely to have a harmful impact upon the significance of those assets, the Plan needs to set out the measures by which it is proposed that the harm will be mitigated.</p> <p>In line with the requirements of NPPF Paragraph 137, consideration should also be given to opportunities, which might enhance or better reveal the significance of any heritage assets.</p> <p>If it is not possible to reduce the harm to the significance of an asset, then an assessment needs to be undertaken of those elements of the scheme against the tests set out in Paragraphs 132 or 133 of the NPPF.</p>			
Response	<p>Comments noted. It will be the City Centre Masterplan which ultimately informs which sites will be identified and allocated within the Local Plan as the preferred option(s) to meet future retail and leisure needs across the plan period, and this process has had regard to the constraints and opportunities presented by the historic environment. The City Council will be consulting on a further version of the CCMP in the Summer (2014). Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p>			
Proposed Change	<p>No change considered necessary.</p>			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20638	Objection	Policy: S 6	46	
104	Emily Hrycan	English Heritage North West		
Detail	<p>Caldew Riverside: The NPPF requires that Plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the justification of the allocations of land for development. Whilst the principle of some form of development may be acceptable. The site is very visible from the City and its significant heritage assets and this includes impacts on the setting of the City Walls (Scheduled Monument), views to the Cathedral and the character and appearance of the Conservation Areas.</p> <p>No assessment or reference to the historic environment (including both designated and nondesignated assets) or local character and context has been made in the designation of these sites or in their justification. This needs to have been undertaken prior to the allocation of this site for development.</p> <p>The Plan should be expanded to include reference to the historic environment in considering the impact of allocating sites for development. There needs to be an assessment of the sites to underpin the allocations before the acceptability of any sites put forward can be considered appropriate. In particular, the potential impacts upon those elements, which contribute towards the significance of the heritage assets in the vicinity.</p> <p>Where the proposals are likely to have a harmful impact upon the significance of those assets, the Plan needs to set out the measures by which it is proposed that the harm will be mitigated.</p> <p>In line with the requirements of NPPF Paragraph 137, consideration should also be given to opportunities, which might enhance or better reveal the significance of any heritage assets.</p> <p>If it is not possible to reduce the harm to the significance of an asset, then an assessment needs to be undertaken of those elements of the scheme against the tests set out in Paragraphs 132 or 133 of the NPPF.</p>			
Response	<p>Comments noted. It will be the City Centre Masterplan which ultimately informs which sites will be identified and allocated within the Local Plan as the preferred option(s) to meet future retail and leisure needs across the plan period, and this process has had regard to the constraints and opportunities presented by the historic environment. The City Council will be consulting on a further version of the CCMP in the Summer (2014). Representations received in response to the second stage of consultation on the CCMP will be used to influence the final draft of the CCMP, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p>			
Proposed Change	No change considered necessary.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20048	Comment	Policy: S 7		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			
20710	Objection	Policy: S 7		
194	Michael Barry	Cumbria County Council		
Detail	Re-submitted Stage 1 Representation No 0989 to which amendments to paragraph 3.75 were made. Suggested Change: Reword policy to ensure it is clear in support of the University and references to development which meet criteria being "acceptable", should be revised to "supported".			
Response	It is proposed that the University policy be absorbed into a broader 'Supporting a skilled and prosperous workforce' policy. However as previously agreed references to the University within this new policy will show a stronger degree of support by amending 'support' to 'acceptable' where applicable.			
Proposed Change	Ensure that the policy is positively worded in response to the University.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent

## Stage 2 Chapter 06

20057 Comment Policy: 30

043 Nigel Winter Stagecoach

**Detail** For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.  
Should not be granted unless the promotion and support of road passenger Transport is achieved.

**Response** The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).

**Proposed Change** Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.

20248 Objection Policy: 30

033 Matthew Good Home Builders Federation

**Detail** The HBF still considers Rep No 0063 - former Policy 33 Delivering Infrastructure still to be valid.

**Response** Noted. Further clarification regarding CIL and S106 was provided in the appropriate policy in response to your representation. The Council considers this to be sufficient.

**Proposed Change** No change.

20357 Comment Policy: 30

139

154/26/27 Mr Bryan Craig

**Detail** There is a need for a properly developed Infrastructure Master plan and an Infrastructure Schedule covering all larger developments throughout the area.

**Response** Noted. The Infrastructure Delivery Plan will look to assess the impacts of proposed development within the Local Plan upon infrastructure networks. Significantly large developments, including the potential Carlisle South Urban Extension, will be delivered through Masterplans, which will look at the infrastructure needs and impacts of proposals. An Infrastructure Schedule will be worked up as part of the on-going work on the Infrastructure Delivery Plan.

**Proposed Change** No change.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20701	Objection	Policy:	30	6.2 - 6.3
095	Sabaa Ajaz	United Utilities		140
Detail	<p>suggested rewording:</p> <p>Para 6.2: '6.2 The NPPF states that planning policy should seek to identify and address potential barriers to new development such as gaps in infrastructure provision. Coordinating development with the delivery of infrastructure imay be necessary in some instances.</p> <p>Para 6.3: Key infrastructure that the Council would expect to see coordinated with the delivery of development includes...: [Bullet points remain]</p>			
Response Proposed Change	<p>Agreed - suggested wording is more positive and appropriate for planning policy.</p> <p>Make changes as suggested.</p>			
20732	Objection	Policy:	31	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1020. Amendements were made. New comments submitted. Suggested Change:</p> <p>Under "Travel Plans &amp; Transport Assessment" delete "to support applications showing:" and replace with; "which are in accordance with the guidance but with particular focus on:".</p> <p>Following the text "cyclists and pedestrians" add "including those with disability".</p> <p>Following the text "(road, rail, cycleways, bridleways and footpaths)" add "such as that needed to support growth in South Carlisle"</p> <p>The text "in the City Centre Masterplan" be deleted and be replaced by "in the infrastructure delivery plan". Within the supporting paragraphs to the policy should be made to the importance of safe walking routes to school.</p>			
Response Proposed Change	<p>Agreed. Suggested amendments will be made.</p> <p>Make suggested amendments.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20307	Support	Policy:	31	
096	Rob Naples	Northumberland County Council		
Detail	Further to Northumberland County Council's comments on the previous Preferred Options consultation, we welcome the inclusion of references to cross-border transport linkages such as the A69 and the Carlisle-Newcastle line in the supporting paragraph 6.9.			
Response	Support noted.			
Proposed Change	N/a			
20358	Objection	Policy:	31	
154/26/27	Mr Bryan Craig			
Detail	The last sentence of the third paragraph is too restrictive and rules out any development in areas without public transport and more especially rural areas. This policy seems to be focussed on the urban part of the City and should include the whole 400 sq. miles.			
Response	Agreed. National policy does allow for some flexibility towards requiring public transport connections within rural areas.			
Proposed Change	Add wording to allow flexibility within rural areas regarding public transport requirements.			
20092	Comment	Policy:	31	
175	Cllr Hugh McDevitt	County Councillor Denton Holme		
Detail	The Local Plan should do everything it can do to support the development/continuation of off road routes. Such routes have been developed from outlying villages such as Dalston & Cummersdale into Carlisle so that people can cycle/walk from these outlying areas to access services within Carlisle City, including the Youth Zone, Sands centre and Sheepmount. It is important that the Local Plan supports the development of these off-road routes which will encourage residents to exercise and help towards our obligations as a Healthy City. It should also aim to ensure that we are an inclusive city and that children can access safe routes to school. Furthermore consideration must be given to ensuring that off road routes are easily accessible for vulnerable users such as the disabled, with the need for a ramped access under Castle Way an example of this.			
Response	Noted. A new strategic policy at the front of the document is being worked up to cover these issues and ensure that the notion of the Healthy City is ingrained into the Plan right from the start. This policy shall be called "Health and Wellbeing".			
Proposed Change	Include Health and Wellbeing as a strategic policy at the front of the document.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20384	Comment	Policy:	31	
241	Mrs Dallas Brewis	Cycle Carlisle		
Detail	<p>This policy talks about detailed proposals &amp; routes for the establishment of a network of cycleways throughout the rural area which is to be commended. There is however no mention of cycle routes in the urban area. There should have been a re-allocation of road space with the completion of the CNDR but this did not happen. The development of the historic core has been detrimental to encouraging cycling - cycling provision was removed from the plan in favour of parking space, this goes against the local plan.</p> <p>The council does not seem to have a travel plan.</p> <p>Additional comments sent by email rec'd 13/04/14</p>			
Response	<p>This policy applies to development within all areas of the district, both rural and urban. The Council does not tend to build and implement cycleways, as it is not a highways authority. Policies in the plan work to protect routes, where proposed. Policies in the Carlisle Local Plan also look to ensure that new development integrates with existing cycle routes wherever possible, as well as ensuring that cycle parking provision is included on site where appropriate.</p>			
Proposed Change	No change.			
20096	Comment	Policy:	31	
210	Cllr Southward			
Detail	<p>The Local Plan should do everything it can do to support the development/continuation of off road routes. Such routes have been developed from outlying villages such as Dalston &amp; Cummersdale into Carlisle so that people can cycle/walk from these outlying areas to access services within Carlisle City, including the Youth Zone, Sands centre and Sheepmount. It is important that the Local Plan supports the development of these off-road routes which will encourage residents to exercise and help towards our obligations as a Healthy City. It should also aim to ensure that we are an inclusive city and that children can access safe routes to school. Furthermore consideration must be given to ensuring that off road routes are easily accessible for vulnerable users such as the disabled, with the need for a ramped access under Castle Way an example of this.</p>			
Response	<p>Noted. A new strategic policy at the front of the document is being worked up to cover these issues and ensure that the notion of the Healthy City is ingrained into the Plan right from the start. This policy shall be called "Health and Wellbeing".</p>			
Proposed Change	Include new strategic policy for "Health and Wellbeing" at the start of the document			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20114	Objection	Policy:	31	
214	Mr Nicholas Bethune	Campaign for Borders Rail		
Detail	<p>Sustainable Transport Plan: The plan relies on the Cumbria Local Transport Plan to identify disused railway lines that should be safeguarded for future reinstatement, but the current version of the strategy document (LTP3) does not mention the Carlisle – Longtown – Borders railway and the relevant policy, which listed this and other future transport schemes (9.16/T29/Schedule 2), is no longer in force.</p> <p>The statement on safeguarding disused railway lines for use as 'Green Infrastructure' does not offer sufficient alternative protection as the definition does not include reuse for rail transport and in any case there is no list of specific routes which would qualify for safeguarding as Green Infrastructure.</p> <p>Please refer to our separate Consultation Response document for comprehensive details and background to this and our other comments.</p>			
Response	<p>Policy 31 to be amended by inserting a specific reference to an appendix within the Local Plan listing specific transport projects for safeguarding (see next rep 20115). This is to replace Cumbria Transport Policy 9.16.</p> <p>Noted. Mention of this project has been unintentionally omitted through changes in local and national policy and the loss of regional and subregional policy documents. It can and should be mentioned directly within the sustainable transport policy and within the supporting text of the green infrastructure policy with regard to the protection of railway routes. The Key Diagram can also be updated to indicatively show the proposed route. However, it is not yet considered appropriate to designate the line as a protected strategic transport link - more discussion is required and clearer evidence of the line's viability and financial backing (either from the LEP, County Council or other strategic funding body) should be presented. There is policy within the plan to designate and protect routes as and when they come forward, it is likely that a review of sites and designations will take place once a firm steer on the route is available to allow its protected designation to be shown on the policy map.</p>			
Proposed Change	Update key diagram to show indicative route of borders rail route. Provide mention of Borders Rail in Transport/Green Infrastructure policies.			
20234	Objection	Policy:	32	
088	Elizabeth Allnutt	Save Our Streets		
Detail	<p>The policy does not address the issue of what effect the removal of city centre car parks – as envisaged if the proposed development sites are exploited as seen in the CCMP - might have on the residential and other areas immediately adjacent to the city centre. The policy recognises the problem of on-street parking and the need to alleviate them but does not extend to preventing the increase of the problem by removing viable city-centre car parking space.</p> <p>Recent County Council proposals to install onstreet parking meters in Rickergate streets is in direct opposition to this policy particularly as Rickergate is in the Conservation Area.</p>			
Response	<p>The car parking policy addresses car parking standards for all development. The issue raised in this representation is in regard to a major development proposal currently being worked on through the City Centre Masterplan. The Local Plan supports the implementation of the Masterplan, but is unlikely to include the detail that will be presented in the masterplan. It can be safely assumed that any proposals for new retail development will include integrated carparking provision. Likewise, for the city centre to continue functioning any loss of car parking to retail development would need to be compensated for with replacement parking provided either as part of new development or elsewhere within the city centre. The Masterplan will be publically consulted upon once it is available.</p>			
Proposed Change	<p>Wording can however be included in the car parking policy to resist the loss of city centre parking unless suitable replacements are provided.</p> <p>Provide wording in the car parking policy to resist the loss of city centre parking unless suitable replacements are provided.</p>			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20733	Objection	Policy:	32	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1021. No amendments were made. Amended comments submitted. Suggested Change:</p> <p>It is considered that the proposed policy should be amended in order to allow appropriate parking standards to be developed rather than the preemptive approach taken in this policy. It is recommended that there is further dialogue with respect to the content of this policy with the Highways Authority in order to achieve an agreed outcome.</p>			
Response	<p>Noted - this policy does allow for appropriate parking standards to be worked out in detail, with input from the Highways Authority, through the production of an SPD. The wording in its current state, however, firmly highlights the Council's intention to support minimum parking standards across the district in order to address problems created by years of under provision within developments.</p>			
Proposed Change	No change.			
20508 E2	Comment	Policy:	32	
158/33	Mrs Julie Templeton			
Detail	<p>As a resident of Rickergate I am concerned that the City Centre Masterplan did not clarify what the impact of the proposed closure of car parks in development sites within the city centre would have on the area. The small businesses in Rickergate are also very concerned that they were not consulted on plans to introduce on street parking charges in Corporation Road, Peter Street, the back of Corporation Road and Rickergate. This could potentially have a devastating effect on their businesses which rely on short stay parking for their customers. I believe that it could also have an adverse impact on the covered market.</p> <p>Request: A Policy</p>			
Response	<p>The Local Plan supports the implementation of the Masterplan, but is unlikely to include the detail that will be presented in the masterplan. It can be safely assumed that any proposals for new city centre development will include integrated carparking provision. Likewise, for the city centre to continue functioning any loss of car parking to new development would need to be compensated for with replacement parking provided either as part of new development or elsewhere within the city centre. The Masterplan will be publically consulted upon once it is available.</p> <p>Wording can however be included in the car parking policy to resist the loss of city centre parking unless suitable replacements are provided.</p>			
Proposed Change	<p>On-street parking charges is not a matter for this Local Plan and should be discussed with Cumbria County Council.</p> <p>Provide wording in the car parking policy to resist the loss of city centre parking unless suitable replacements are provided.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20385	Objection	Policy:	32	
241	Mrs Dallas Brewis	Cycle Carlisle		
Detail	Increasing parking spaces encourages car use - much more should be done to discourage car use and increased sustainable transport use. This would have added health benefits.			
	Additional comments sent by email rec'd 13/04/14			
Response	Noted. However, the restrictive approach to car parking that has been followed for the last decade does not seem to have resulted in a reduction in car use. Instead residential and employment areas have been developed with inadequate levels of car parking, resulting in cluttered streets and roads that are, at best an eyesore with significant adverse impacts upon townscapes and landscapes and at worst potentially dangerous obstacles on the highway for both pedestrians and other road users.			
Proposed Change	No change.			
20734	Comment	Policy:	33	
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1022. Comments re-submitted. Adequate internet access is important in allowing business to operate effectively and it helps individuals access the services more effectively. This policy, which seeks to ensure that new development can access adequate fibre and ducting brings value and is considered appropriate.			
Response	Support noted.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20613	Comment	Policy:	33	
273	Nicholas Kittoe			
Detail	<p>I have to disclose a special interest in broadband infrastructure as Managing Director of Solway Communications but I am writing in a personal capacity as a resident of Carlisle with the firm intention of being as objective and fair as I can.</p> <p>I would like to congratulate the authors of Policy 33 on creating a policy which represents a major improvement on earlier connectivity policies and on those adopted by most other local authorities that I have encountered. Connectivity is absolutely crucial for the economic well-being of Carlisle as the City has been excluded from the "Super-connected Cities" connectivity subsidy programme from which two neighbours, Edinburgh and Newcastle (as well as 20 others) are to benefit. If the standards already set out in Policy 33 are adopted in Carlisle, that will result in an enormous improvement in the City's connectivity, taking it from its already good position to outstanding. This will help to counter-balance the City's lack of "Super-connected City" status.</p> <p>Policy 33 demonstrates unusual insight into the realities of modern connectivity. By specifying that broadband access should be a minimum of a given speed and that the speed should be symmetrical, the policy implicitly rejects the spurious "up to" performance assurance and the minimal upload ratio of the established land-line operator. "Up to" speeds are of little use for business and professional applications where reliability is the key requirement. Such users need a dependable minimum speed assurance precisely as specified in policy 33. Symmetry, equal upload capacity, is essential for efficient use of any inter-active use of the Internet such as "Cloud Applications", VoIP and video-conferencing. Incidentally, we can demonstrate conclusively from the usage statistics of our customers that very few business customers indeed make use of more than 10 Mbps, but they need to be sure that they will get it. As the Google iPlayer test site shows, the consumer user of iPlayer or Netflix is perfectly well served with 5 Mbps. The really important thing for both types of user is a dependable connection and consistent performance to the contracted standard. Two further essential features of modern connectivity, which the principal telecoms operators prefer not to talk about, are packet-loss (which should be near zero) and latency (which should be under 20 ms to a principal UK site such as the BBC). Much of the Nation's communications infrastructure falls very short in these respects which are critical for any interactive use of the Internet. Although Carlisle's own Internet provider, Solway Communications, can deliver 100 Mbps symmetric almost everywhere in the area covered by the City Authority and delivers 1,000 Mbps in several areas already, my suggestion is that policy 33 should not expose its credibility to criticism as unrealistic by specifying a minimum speed which would be attainable in the remoter parts of the area only at unrealistic cost. Instead, the policy could set a consistent committed 25Mbps as a firm target for most of the area and set the minimum standard at a realistically attainable target such as 10Mbps but include a standard of 25ms for latency and 0.1% as maximum packet-loss.</p>			
Response	Support acknowledged. And agreed, the policy will set a minimum target of 10mps for the entire district, with a further target of 25mps to be achieved wherever possible. Reference will also be made to working towards a standard 25ms latency and a maximum packet-loss of 0.1%.			
Proposed Change	Update policy to reflect suggested changes.			
20735	Objection	Policy:	34	
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1023 to which an amendment was made. Comments and suggested change re-submitted. Suggested Changes: Policy 37 or supporting text should make reference to the potential role of waste management plans.			
Response	Noted. The Waste Management policy already does make reference to waste management plans within the supporting text.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20736	Objection	Policy:	35	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1024 to which amendments were made to Policy 45 and title of Policy 38. New comments and suggested change submitted. Suggested Changes:</p> <p>Would recommend amending second para as follows: 'Development which would involve surface water draining into foul only sewerage network will not be permitted'</p> <p>Some of the detail highlighted above, should be added to the 'Justification' section.</p> <p>The below statement heading-up the policy should be revised to state: "All surface water drainage shall meet the provisions for SuDS approval as required under the Flood &amp; Water Management Act 2010".</p>			
Response	Noted, and for the most part agreed. However, the comments regarding SuDS are not appropriate for this policy, which deals solely with foul water. The SuDs policy has been produced with regard to the Flood & Water Management Act 2010.			
Proposed Change	Changes to be made as suggested, excluding SuDs related change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20702	Objection	Policy: 35	154	
095	Sabaa Ajaz	United Utilities		
Detail	<p>United Utilities requests that the following policy is considered as an alternative to the wording extracted in the consultation document.</p> <p>'Applicants are required to consider foul and surface water drainage arrangements in liaison with the relevant statutory bodies for wastewater to establish the impact of new development on wastewater infrastructure in advance of planning permission being granted. In some circumstances, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. In certain circumstances, a new development will be required to discharge wastewater to the public sewerage system at an attenuated rate.</p> <p>The treatment and processing of surface water is not a sustainable solution. Applicants are required to demonstrate sustainable solutions for the disposal of surface water as set out in Policy 41.'</p> <p>Justification Text could be amended to read:</p> <p>'para 6.50: At present, the Council has been made aware that wastewater infrastructure in Wetheral and Great Corby is nearing capacity. Any development proposals may therefore require a co-ordinated approach with any infrastructure improvements. In order to understand the impact on infrastructure and most appropriately manage the impact, it will be useful to understand the applicants approach to surface water management. Early engagement with United Utilities is emphasised within the Wetheral and Great Corby drainage catchment area.'</p>			
Response	<p>Noted. As United Utilities is the lead authority regarding waste water treatment and policy 35 was amended in light of comments received during Stage 1 consultation. It is considered that the new policy wording however is not acceptable in its entirety - it is jargon heavy and lacking in clarity and certainty. Certain aspects will be incorporated where appropriate, but the policy wording will not be replaced entirely. The Council wishes to be firm - where inadequate infrastructure exists, with no plans to improve, it needs to be clear that development will not be acceptable until the situation is rectified. Simply inviting applications to "consider" this is not strong enough.</p> <p>The proposed changes to the supporting text are acceptable, though more information on the situation regarding the Wetheral and Great Corby treatment works would be appreciated.</p>			
Proposed Change	Make changes as suggested.			
20572	Comment	Policy: 35	6.50	155
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	All agreed a new pipe line would be preferable to a villages such as Great Corby & Wetheral- The City Council should be more insistent			
Response	Noted. United Utilities are looking at a range of options for Wetheral and Great Corby to improve waste water treatment capacity. The allocation of land for residential development in Wetheral will likely encourage United Utilities to move towards implementation of new infrastructure.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20359	Comment	Policy: 35	6.50	155
154/26/27	Mr Bryan Craig			
Detail	Can Dalston be added to this as it was identified in the recent Story application?			
Response	Agreed. Previous meetings with United Utilities have highlighted that the recent major approval in the village will likely take up the bulk of its foul water treatment capacity. Dalston can be highlighted in the policy as an area of concern.			
Proposed Change	Include reference to Dalston in light of recent approval.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20737	Objection	Policy: 36		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1025 and wording was amended in accordance with suggestion. Comments:</p> <p>While we are pleased that this policy has been enhanced, we are concerned that it still fails to comprehensively and explicitly as many of the possible forms of contribution (including education) obligations may be sought for.</p> <p>Policy 36 should be revised to list the following infrastructure:</p> <p>Transport improvements (including public transport) and its resulting maintenance;</p> <p>Car parking;</p> <p>Footpaths and cycle ways;</p> <p>Drainage infrastructure;</p> <p>Heritage assets;</p> <p>Flood risk and surface water management;</p> <p>Waste management;</p> <p>Broadband and communication networks;</p> <p>Low carbon energy and renewable energy infrastructure.</p> <p>Affordable housing;</p> <p>Education provision;</p> <p>Community facilities (including health, police);</p> <p>Local employment and training initiatives;</p> <p>Adult social care,</p> <p>Fire service and community safety;</p> <p>Green Infrastructure, including public open space, play areas and sports facilities;</p> <p>Nature conservation, biodiversity enhancement and mitigation measures;</p> <p>Environmental improvements;</p> <p>Public realm (including public art).</p>			
Response	The list in this policy is not meant to be exhaustive. The suggested amendments are acceptable however and the list will be updated.			
Proposed Change	Update list of possible forms of contribution as suggested.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20559	Comment	Policy: 36		
270		Carlisle Shopping Centre Ltd	Ao28	
Detail	<p>We appreciate the need for planning obligations and the policy wording in order to achieve this.  We are particularly supportive of the recommendation that:  "The contributions must not, however, be excessive to the point that the viability of development is compromised, and must therefore be appropriate to the scale and type of development proposed."</p>			
Response	Support noted.			
Proposed Change	N/a			
20235	Objection	Policy: 36		
o88	Elizabeth Allnutt	Save Our Streets		
Detail	The lack of clarity around CIL has been noted in rep No 20234 Policy 32			
Response	<p>No decision has yet been taken on CIL. As such, the technical details in terms of how it will work, what it will be used for, how much will be sought, etc have not yet been decided, or even considered in any significant detail. This work will be done once the Local Plan is in place and once the Infrastructure Delivery Plan has been finalised.  Should the Council decide to pursue CIL a separate development plan document, which will sit alongside the Local Plan, will be produced to set out how the CIL will work in detail.</p>			
Proposed Change	No change			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20336	Comment	Policy: 36		
062		Church Commissioners for England	A013	
Detail	<p>We support the assertion set out in paragraph 1.30 of the Local Plan which states out that the Plan should be deliverable and that development sites should not be subject to too many onerous requirements which may question the delivery of development.</p> <p>We note that the introduction of a Community Infrastructure Levy (CIL) is currently still under review, however, flexibility is required with regard to developer contributions to ensure that a scheme remains viable following potential Section 106 agreements and / or CIL requirements. The Council must assess each scheme on its individual merits to ensure development can and will take place.</p> <p>Whilst we fully recognise the need for the provision of developer contributions, it is essential that the policy goes further to ensure that Carlisle City Council will seek to 'strike a balance' between the level of contribution to ensure sustainable development and the realities of economic viability. Reference should be made to the Local Housing Delivery Group (Viability Testing Local Plans, June 2012) document and paragraphs 173 and 174 of the NPPF.</p> <p>As stated in the NPPG, obligations should meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Please refer to The Community Infrastructure Levy Regulations (2010) for further detail.</p> <p>These comments also relate to the following policies:</p> <ul style="list-style-type: none"> <li>• Policy 19 'Affordable Housing';</li> <li>• Policy 30 'Delivering Infrastructure';</li> <li>• Policy 31 'Sustainable Transport';</li> <li>• Policy 33 'Broadband Access';</li> <li>• Policy 39 'Development Energy Conservation and Efficiency'; and,</li> <li>• Policy 63 'Open Space'</li> </ul> <p>In line with these documents, the above policies, particularly Policy 36, must affirm that the Council will ensure that the addition of developer contributions and/or CIL will not put the overall development across the District at risk due to viability.</p> <p>Detailed comments on viability will be submitted to the Carlisle Viability Consultation, under separate cover.</p>			
Response	<p>Noted. The Planning Obligations policy is already quite clear that any developer contributions sought as part of a planning application must not be excessive to the point of endangering the viability of a scheme, stating that they must be appropriate to the scale, type and location of the development proposed. Viability testing is already directly referenced in this policy, along with a clear description of how and when Section 106 agreements can and will be applied. Reference to how they must be directly related to the development can be included for additional clarity on the matter. Policy 36 is the main policy for considering planning obligations and as the Plan is supposed to be read as a whole, there is no need to repeat policy elsewhere. The balanced approach to developer contributions set out in policy 36 will apply to all developments and any of the potential contributions set out in other policies in the Plan.</p>			
Proposed Change	<p>Specific mention of the need to ensure contributions are directly related to development to be included in policy 36.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20058	Comment	Policy: 36		
043	Nigel Winter	Stagecoach		
Detail	For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each. Should not be granted unless the promotion and support of road passenger Transport is achieved.			
Response	The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).			
Proposed Change	Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.			
20249	Objection	Policy: 36		
033	Matthew Good	Home Builders Federation		
Detail	The HBF still considers Rep No 0063 - former Policy 33 Delivering Infrastructure still to be valid.			
Response	Noted. Further clarification regarding CIL and S106 was provided in the appropriate policy in response to your representation. The Council considers this to be sufficient.			
Proposed Change	No change			
20157	Objection	Policy: 36		
223		Taylor Wimpey UK Limited	A026	
Detail	Taylor Wimpey UK Limited objects to the requirement in Policy 36 for developers to pay planning obligations for maintenance payments, to meet the initial running costs of services and facilities and to compensate for the loss or damage caused by the development. Taylor Wimpey considers that this requirement is unreasonable.			
Response	Noted. These potential contributions are listed under the caveat that they "may" be sought. The policy allows for the Council to seek contributions from developers on one or more of these factors as and where appropriate - it does not necessarily mean that all three, if any, will be sought for the same development. An "and/or" can be inserted into the text to make this clearer, but it would be unreasonable for the Council to remove policy provision for this, particularly when seeking compensation/mitigation for any damage or loss that may be caused by a development.			
Proposed Change	Insert "and/or" into this part of the policy.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20673	Objection	Policy: 36	156	
104	Emily Hrycan	English Heritage North West		
Detail	The NPPF requires that Local planning authorities set out in their Local Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The Policy would benefit from reference to the historic environment including the above.			
	The Policy should be amended to include reference to “historic environment including heritage at risk” as well as archaeology.			
Response	Noted. This change was made in light of your response asking for the same during the Stage 1 Preferred Options consultation.			
Proposed Change	No change - already made in response to identical rep during Stage 1 consultation.			
20603	Comment	Policy: n/a		
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	General Comments: Infrastructure - There is a need for a properly developed Infrastructure Master plan and an Infrastructure Schedule covering all larger developments with consideration to the cumulative effects of the large developments added to the smaller ones. Infrastructure should not be decided on a piecemeal basis as happens now. Any development should be considered as a whole and if different developers are involved, each should be apportioned responsibility for infrastructure according to the needs of their particular part. The infrastructure must be in place for the expansion of the city, in particular on the South side – Dalston Road/Peter Lane. Local councils should have a robust strategy, integrated with the County Council, to ensure that the developers shoulder their appropriate economic portion.			
Response	Agreed. This is the general cut and thrust of policy 30 Delivering Infrastructure. The Council is also, alongside the Local Plan, producing an Infrastructure Delivery Plan that will look at infrastructure provision across the district, assessing what is needed to support the plan and how and when this would be funded and delivered.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20541	Comment	Policy: n/a		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Overview comments</p> <p>Public Transport Accessibility</p> <p>There are significant differences between Carlisle's urban and rural areas with regard to the provision of public transport services. Many of the communities surrounding Carlisle have limited or no local bus services. Recent proposals to remove, or cut, public transport subsidies would have a major negative impact on people residing in the rural area, especially those who do not drive or do not have access to their own transport. Stanwix Rural Parish Council's response to the Budget Consultation on Bus Services – Appendix A; clearly explains the importance of public transport to rural communities relatively close to the urban area. The impacts felt further afield will be significantly greater.</p> <p>The closure of the Hadrian's Wall Trust may yet have unforeseen consequences for the future of the AD122, Hadrian's Wall Bus. This service brings benefits to many local communities and to the significant numbers of tourists, who make use of the service during the summer. As closure or curtailment of this service would have significant negative impact on the economic prosperity of these communities, the Parish Council urges that provision be made in the LP to support and encourage continuation of the service.</p> <p>Green Infrastructure connections (footpaths/cycle ways)</p> <p>In order to enable and encourage safer cycling the LP should include an identified and structured plan for the provision cycle ways into, around and through the City. These routes should then be protected from conflicting proposals until they can become fully operational.</p> <p>Health Facilities</p> <p>Facilities, in particular dentistry, are currently limited and over stretched with NHS patients finding it difficult to find a practice willing to take them on. It is even more difficult in the rural area; NHS Choices website lists only 1 dental practice in Wetheral and 2 in Brampton but also shows that these are not taking on new patients. There exists a significant requirement for a planned upgrade of all Health and wellbeing services in order to address the needs arising from any additional growth of the City.</p> <p>Planning Obligations</p> <p>Definitions of what might constitute 'excessive', 'viability' and 'compromised' are capable of precipitating lengthy legal arguments. It may therefore be prudent to amend the final paragraph of the policy to delete the phrase - "...must not, however, be excessive to the point that the viability of development is compromised, and..." - thus reducing the potential for argument to the more quantifiable 'appropriate'.</p> <p>The Parish Council notes that Carlisle City Council has yet to adopt a policy in respect of the Community Infrastructure Levy – CIL. In view of the financial strictures currently taxing local authorities the implementation of such a policy would enable CIL contributions to be passed directly to the local communities affected by the relevant development, thus enabling them to alleviate some of the financial burden carried by the local authority.</p>			
Response	<p>Public transport accessibility - The Council would agree that the cancellation of the Hadrian's Wall bus route is unfortunate, and will have a significant impact upon public transport users within rural communities. The Council does not, however, have any control over the cancellation of the service and the Plan would not be able to influence this. This matter should be discussed with the Cumbria County Council, who are the transport authority for the district, or with the bus company themselves.</p> <p>Green Infrastructure Connections - Unfortunately, new transport links, including strategic cycle networks, do not fall within Carlisle City Council's remit. These tend to be provided by either Cumbria County Council, as the transport authority, or cycle organisations like Sustrans. The policies in this plan do already serve to provide protection for transport routes once proposals have progressed to a point that a viable and agreed route has been produced.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
		<p>Health - concerns are noted. Unfortunately, Carlisle City Council does not provide health services such as dental surgeries. We do however work closely with health groups, such as the clinical commissionaires group, to ensure that health provision is planned for and provided as and when it is needed.</p> <p>Planning Obligations - your concerns here are noted. However, the terms used in the planning obligations policy come from the NPPF, which stresses the need for Councils to be sure that obligations do not compromise the economic viability of the scheme. It is accepted that this can lead to debate around the specific tipping point between viability and unviability, but this will have to be addressed on a case by case basis.</p> <p>CIL: A pre-requisite of being able to introduce a Community Infrastructure Levy is an up to date Development Plan, as well as clear evidence of a funding deficit with regards to the delivery of infrastructure which has been proven as essential in order to realise the ambitions of the Development Plan. Alongside the Local Plan the Council continues to engage with a wide array of infrastructure providers through the process of preparing the Infrastructure Development Plan (IDP). The IDP will, once at an advanced stage later in the year, provide key evidence with regards to identifying if there is a need for CIL within Carlisle, at which point a stronger commitment could be included in the Plan. Beyond this it must also be acknowledged that even if a Council resolution to progress with CIL is forthcoming, whether one could be introduced or not would depend on an assessment of the viability implications of doing so, and a charging schedule would ultimately have to be found sound through the course of a public examination.</p>		
Proposed Change		No changes but ensure that the key findings from the Infrastructure Delivery Plan are reflected where appropriate within the publication draft of the Local Plan.		

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20607	Comment	Policy:	n/a	
271	Toby Harling			
Detail	<p>I am writing to advocate the importance of improving transport over the next few years so that Car use can be dramatically reduced. My suggestions are: Increase train travel by building new stations on existing railway lines at Kingstown / Kingmoor and Durranhill. This will give residents and businesses better access to the railways and will allow commuting from the outskirts of Carlisle to the City Centre by train. Carlisle has grown enormously since the railways were built. It's population is now around 80,000. Compare this with Exeter with a population of 120,000. Exeter will soon have 8 railway stations, and so people can move around that city by train. Carlisle still has a solitary station, and so is not an option for travelling across the city. An improved network of cycleways, so that more people have access to off road routes (which can also be used by people with disabilities and for walking). The routes I want to see developed over the next few years include: {17 routes suggested with comments}</p> <p>01 Etterby Scaur "Footpath"</p> <p>02 Sheepmount – Willowholme Road</p> <p>03 Stony Holme – Memorial Bridge</p> <p>04 Willowholme Road – Hadrian's Cycleway Link</p> <p>05 Hammonds Pond</p> <p>06 Lowry Hill Road – Kingmoor Road</p> <p>07 Lowry Hill Road – Kingstown Broadway</p> <p>08 Dalston Road (Pirelli Factory) to Caldew Cycleway Link</p> <p>09 Dalston Road (Pirelli Factory) – Winscale Way</p> <p>10 Harraby Green Road – Petteril Bank Road</p> <p>11 Stony Holme – Warwick Road</p> <p>12 Melbourne Park – London Road</p> <p>13 Cummersdale – Blackwell Link</p> <p>14 Port Road Business Park to Waverley Viaduct link</p> <p>15 Whiteclosegate – Rickerby Park Link</p> <p>16 Currock Bridge</p> <p>17 Waverley Viaduct</p>			
Response	<p>Your comments are noted, and it is agreed that increased accessibility to the rail network would be great for the city, however, the planning of new stations and rail links goes beyond the remit of the city council. This matter is best raised with Cumbria County Council, as the transport authority, or indeed the rail operators themselves. The same is true for the cycle networks. The Council would move to support and protect any of the routes you suggest, should they come forward and are proven to be viable and realistic, however, it is not within the remit of the plan to propose these links without evidence that they would be delivered. Again, the County Council or groups such as Sustrans would be the best people to discuss this with.</p>			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent

## Stage 2 Chapter 07

20596	Comment	Policy:	35	155
196	Mrs S Tarrant			Clerk to Cummersdale Parish Coun
Detail	Related directly to 3.37			
Response	Noted.			
Proposed Change	N/A			

20370	Objection	Policy:	37	
121	Mike Fox			Brampton Economic Partnership
Detail	Same as original submission 0564 Sustainability and renewable considerations, the use, development and value of anaerobic digesters could be given greater profile, with the potential benefits on a community basis made clearer.			
Response	Same as original response to 0564- Comments are noted and the Plan has been updated accordingly. It is however worthwhile noting that in some cases applications for anaerobic digester plants would come under the remit of Cumbria County Council as Waste Planning Authority and will be assessed using the Minerals and Waste Local Plan. This is primarily where the renewable energy development will import off-site waste materials.			
Proposed Change	No proposed change from that made originally against response number 0564.			

20218	Support	Policy:	37	
077	Mr Alan Hubbard			National Trust
Detail	The amendment to Criterion 6 to refer to 'settings' is noted, welcomed, and suitably addresses the concern previously raised by National Trust.			
Response	Comment of support noted.			
Proposed Change	No proposed change.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20738	Objection	Policy:	37	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1026 and wording was amended. Comment re-submitted:</p> <p>The approach proposed allows the careful consideration of the impact of proposals individually and having regard to cumulative effects and it is considered to be broadly appropriate. The County Council is currently working with partners, including Carlisle City Council, in the development of a study that will consider the cumulative landscape and visual impacts of vertical infrastructure (e.g. wind turbines, pylons, telecoms, masts etc.) within the County. This study may assist the future consideration of such proposals.</p> <p>Suggested Changes</p> <p>It is suggested that the Local Plan has regard to the above study in the determination of planning applications.</p>			
Response	<p>Comment noted however reference is made o the Cumulative Impact of Vertical Infrastructure Study within Policy 38 - Wind Energy. Whilst Policy 37 - Renewable Energy also covers wind energy, it is much broader and so it is considered that reference to this document is best placed within the justification to Policy 38.</p>			
Proposed Change	<p>No proposed change as adequate reference is made within the justification of Policy 38 - Wind Energy.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20203	Comment	Policy:	38	
049	Mr D Nash			
Detail	<p>I note that the proposals show wide exclusion zone to the east of the city and the case is made for this, however it leaves the west subject to the mercy of the Wind Turbine industry , which could leave the county with a fence of Turbines from Copeland to Carlisle .</p> <p>I also note that we fail to provide guidance regarding the distance that these should be from places of residence , I accept that you are governed to a degree by statute, but Carlisle must be more robust in its statements, thus providing a strong message to this industry that Carlisle will oppose developments that are close to residential property.</p>			
Response	<p>Comments are noted in respect of the situation to the west of Carlisle. As correctly suggested, this area is under the most pressure for turbine development within Carlisle District given that it is not covered by any landscape designation/military/airport buffer zone. Despite this, it is important to ensure that this landscape does not become saturated with turbine development. A Cumbria wide study looking at the cumulative impact of vertical infrastructure has been carried out and is expected to be completed shortly. This study will be used to assess the potential impact that further vertical infrastructure (including wind turbines) could have on the landscape and will help to judge whether an increase in development of this type would saturate the landscape.</p> <p>In terms of opposing this type of development where they will be located close to residential properties, it is not considered appropriate to develop criteria that stipulates a minimum setback distance between residential dwellings and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the a set distance, however adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect dwellings from potential harm.</p> <p>Within guidance published by the Government in June 2013 'Planning practice guidance for renewable and low carbon energy' the document questions if buffer zones/separation distances are appropriate between renewable energy development and other land uses. The study states that "Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis".</p> <p>Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that enforcing a set distance will not have an impact and thus it is better to assess this on a case by case basis.</p>			
Proposed Change	No proposed change in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20219	Support	Policy:	38	
077	Mr Alan Hubbard	National Trust		
Detail	The amendment to Criterion 4 to refer to 'settings' is noted, welcomed, and suitably addresses the concern previously raised by National Trust.			
Response	Comment of support noted.			
Proposed Change	No proposed change.			
20360	Objection	Policy:	38	
154/26/27	Mr Bryan Craig			
Detail	I would like to see Minimum Distance from Residential Premises requirements put into the plan following those laid out in the original Private Members Bill – House of Lords - Session 2010/11.			
Response	In terms of the original Private Members Bill, the 2010-2012 session of parliament has prorogued and this Bill will make no further progress. This is not in line with current Government policy on this matter.			
	<p>It is not considered appropriate to develop criteria that stipulates a minimum setback distance between residential dwellings and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the a set distance and therefore adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred policy option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect residential premises from potential harm.</p> <p>The Government published Planning Practice Guidance in April 2014 which supports this stance stating that 'Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis'.</p> <p>Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that enforcing a set distance will not have an impact and thus it is better to assess this on a case by case basis. The Policy, as consulted on, examines the effect of wind energy development on the visual impact on the landscape and townscape, effects on nature conservation, impacts on heritage assets, effects on highways infrastructure and telecommunications, effect on recreational facilities, effects on civil or military aviation and other defence assets and the cumulative effects of turbine development when proposals are considered together within the same landscape.</p>			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20739	Comment	Policy:	38	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1027 and wording was amended. Revised comment submitted:</p> <p>This policy highlights a range of considerations that regard should be given to during the consideration of wind energy schemes. The approach proposed appropriately allows the careful consideration of the impact of proposals individually and having regard to cumulative effects and it is considered appropriate.</p>			
Response	Commend of support for the Wind Energy Policy noted.			
Proposed Change	No proposed change.			
20004	Objection	Policy:	38	164-169
160/35	Mrs Catherine Leach	Clerk to Bewcastle Parish Council		
Detail	<p>We wish to re-iterate our comments on the distance between any proposed wind farm and the nearest dwelling. In the 1st Stage consultation Rep No 0817 we wished to see the distance set at 2000 metres. This has been dismissed along with other suggestions of a 1000 metres.</p> <p>Once again the PC requests that a buffer zone of 2000 be required unless dwellings within this zone are content for the distance to be reduced. The noise, shadow flicker and low frequency sound or vibration could have serious effect on anyone suffering from certain forms of ill health such as epilepsy or migraine. The PC trusts that you will give serious consideration to this suggestion and amend the policy accordingly.</p>			
Response	<p>It is not considered appropriate to develop criteria that stipulates a minimum setback distance between residential dwellings and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the 2000 metres suggested, however adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred policy option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect residential premises from potential harm.</p> <p>The Government published Planning Practice Guidance in April 2014 which supports this stance stating that 'Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis'.</p> <p>Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that enforcing a set distance will not have an impact and thus it is better to assess this on a case by case basis. The Policy, as consulted on, examines the effect of wind energy development on a range of criteria, including; local amenity in relation to noise, amplitude modulation, shadow flicker, low frequency sound or vibration. This therefore highlights that the potential effects of wind turbine development will be robustly considered.</p>			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20571	Objection	Policy:	38	165
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Distance from residential property determined- should be min. 1500m			
Response	<p>It is not considered appropriate to develop criteria that stipulates a minimum setback distance between residential dwellings and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the a set distance and therefore adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred policy option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect residential premises from potential harm.</p> <p>The Government published Planning Practice Guidance in April 2014 which supports this stance stating that 'Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis'.</p> <p>Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that enforcing a set distance will not have an impact and thus it is better to assess this on a case by case basis. The Policy, as consulted on, examines the effect of wind energy development on the visual impact on the landscape and townscape, effects on nature conservation, impacts on heritage assets, effects on highways infrastructure and telecommunications, effect on recreational facilities, effects on civil or military aviation and other defence assets and the cumulative effects of turbine development when proposals are considered together within the same landscape.</p>			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20595	Objection	Policy:	38	165
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	No distance from residential property determined, the District Council should have a policy specifying the distance from residential properties dependent on the size of the turbine.			
Response	<p>It is not considered appropriate to develop criteria that stipulates a minimum setback distance between residential properties and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the a set distance and therefore adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred policy option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect residential premises from potential harm.</p> <p>The Government published Planning Practice Guidance in April 2014 which supports this stance stating that 'Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis'.</p> <p>Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that enforcing a set distance will not have an impact and thus it is better to assess this on a case by case basis. The Policy, as consulted on, examines the effect of wind energy development on the visual impact on the landscape and townscape, effects on nature conservation, impacts on heritage assets, effects on highways infrastructure and telecommunications, effect on recreational facilities, effects on civil or military aviation and other defence assets and the cumulative effects of turbine development when proposals are considered together within the same landscape.</p>			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20253	Objection	Policy: 39		
033	Matthew Good	Home Builders Federation		
Detail	Policy 39 requires development to seek to improve CO2 emissions savings above the Building Regulations baseline and set out how these improvements will be achieved within a Design and Access statement. The Government has recently signalled that it intends to include all energy standards for buildings within Part L of the Building Regulations. Once the new Building Regulations are in place the Council will no longer be able to request additional local standards on such issues. It is therefore recommended that the Council remove these standards from the policy.			
Response	Comments are noted. As highlighted within a Written Ministerial Statement by the Parliamentary Under Secretary of State for Communities and Local Government, the Government has decided that the most sensible way forward is for any necessary technical standards as far as possible to be consolidated into the Building Regulations and the accompanying Approved Documents. It is considered that due to the progressive tightening of national standards through Building Regulations, the requirement for development to seek to improve CO2 emissions savings above the Building Regulations baseline should be removed from this Policy Justification. The Development, Energy Conservation and Efficiency Policy will remain in order to encourage development to build to high standards of efficiency and thus reduce our carbon footprint. There was also concern that this requirement may be difficult to enforce.			
Proposed Change	The Policy justification no longer includes the requirement that development will be expected to seek to improve CO2 emissions savings above the Building Regulations baseline.			
20262	Objection	Policy: 39		
098		Sainsbury's Supermarkets Ltd	A015	
Detail	On behalf of our client Sainsbury's Supermarket's Ltd, we have reviewed the draft of the Carlisle District Plan – Preferred Options Stage 2 and would like to take this opportunity to state that representations submitted against policies during the Preferred Options Stage 1 consultation (September 2013) are maintained and should be fully considered in preparation of the Publication draft. Representation No 0442 (was policy 43)			
Response	Positive comments are noted relating to the importance of working to reduce the carbon footprint and environmental impact of development.			
Proposed Change	No proposed change.			
20740	Support	Policy: 39		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1028. Comment of support resubmitted: This policy seeks to encourage energy conservation measures in new development and is welcome.			
Response	Comment of support for the Development Energy Conservation and Efficiency Policy noted.			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20741	Comment	Policy: 40		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1029 and amendments made. Stage 2 comment: We have no comment to provide on this policy.			
Response	Comment noted.			
Proposed Change	No proposed change.			
20361	Objection	Policy: 40	7.47	
154/26/27	Mr Bryan Craig			
Detail	There is no mention of the recent flooding at Stockdalewath and the River Roe and Penn Beck There should be no development in Flood Zone 3 unless it is water related.			
Response	The flood risk policy outlines the criteria by which applications for new development within an area at risk of flooding would be assessed. This policy is reflective of what is outlined within the NPPF and recently published Planning Practice Guidance.			
	Reference has now been made within the justification to include Roe Beck at Stockdalewath.			
Proposed Change	Justification has been updated to include reference to flood risk from Roe Beck at Stockdalewath.			
20685	Comment	Policy: 41		
097	Jessica Patten	Environment Agency		
Detail	We note that we provided comments to you during the first stage of consultation in September 2013, and that these have been incorporated into the stage 2 documents you have produced. We do not have any specific further comments in addition to those made in 2013, though would reiterate the following: - Across the sites, surface water will need to be constrained to Greenfield run-off rates and drainage strategies will need to address any capacity problems on the sewer and surface water sewers. - Policy 45 (now policy 41), relating to sustainable drainage systems to manage surface water will need to be strictly applied.			
Response	Comments are noted. Policy 41 Sustainable Drainage Systems will be updated to state the requirement for run-off from development sites to be constrained to Greenfield run-off rates and their requirement to address any capacity problems on surface water sewers.			
Proposed Change	The Policy Justification has been updated to say 'In any case surface water within new development will be constrained to Greenfield run-off rates and will need to address any capacity problems on surface water sewers'.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20703	Objection	Policy: 41	178	
095	Sabaa Ajaz	United Utilities		
Detail	<p>United Utilities requests that this policy is amended as shown below to consider surface water management and SUDs. It is requested that the policy is renamed as: 'Surface Water Management and Sustainable Drainage Systems'.</p> <p>Text:</p> <p>'The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at the source and not transferred. Every option should be investigated before discharging surface water into the sewerage network. Surface water should be discharged in the following order of priority:</p> <ol style="list-style-type: none"> <li>1) a soakaway or some other form of infiltration system (using Sustainable Urban Drainage principles); or</li> <li>2) an attenuated discharge to watercourse; or</li> <li>3) an attenuated discharge to surface water sewer; or as an absolute last resort</li> <li>4) an attenuated discharge to combined sewer.</li> </ol> <p>As outlined in the hierarchy above, where practicable Sustainable Drainage Systems (SUDs) should be incorporated as the means for the disposal of surface water in the first instance. Where SUDs are incorporated, the applicant will submit a drainage strategy including: the type of SUDs; hydraulic design details / calculations; and pollution prevention and water quality treatment measures together with details of pollutant removal capacity as set out in the CIRIA SUDs Manual C697 or equivalent and updated local or national design guidance.</p> <p>Applicants wishing to discharge to sewer will need to submit clear evidence demonstrating why alternative options such as SUDs or discharging to watercourse are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. Should there be no alternative option but to discharge surface water to the sewerage system, discharge of surface water will be limited to an attenuated rate, including an allowance for climate change, agreed with the sewerage company. This will be secured by planning condition.</p> <p>On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of at least 30% in surface water discharge, rising to a target of 50% in critical drainage areas.</p> <p>A discharge to groundwater or watercourse may require consent of the Environment Agency.</p> <p>Landscaping proposals should consider the contribution of landscaping a site can make to reducing surface water discharge. This can include soft and hard landscaping such as permeable surfaces as set out in Policy S5.'</p> <p>Justification Text</p> <p>United Utilities requests that the following paragraphs are added to the justification text in light of the above suggested amendments.</p> <p>Para 7.63: United Utilities requests that the LPA robustly considers the availability of alternatives to the public sewer for sites which are proposed to be developed. This should be a consideration as part of the planning application determination process. Applicants will be required to thoroughly investigate the surface water hierarchy on sites. It is most appropriate to establish key site specific drainage principles and the most sustainable form of surface water drainage at the planning application stage. Any surface water discharge should be attenuated to the most appropriate level having regard to existing site conditions including an allowance for climate change.</p> <p>Para 7.64: United Utilities 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 to most appropriately manage the impact of growth on infrastructure. United Utilities requests that developers / applicants clearly demonstrate with evidence, how they have applied the surface water drainage hierarchy outlined above as part of the consideration of development sites.'</p>			
Response Proposed Change	<p>Advice is noted and subject to discussion with Development Management Officers, changes will be made to the Policy and Justification.</p> <p>Changes as per those suggested to both the Policy and Justification.</p>			

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# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

## Stage 2 Chapter 08

20743 Support Policy: 42

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 1030 no amendments made. Stage 2 support:  
This policy sets out the criteria against which proposals for new doctors surgeries are considered and is welcomed.

Response Comment of support noted.

Proposed Change No proposed change.

20059 Comment Policy: 42

043 Nigel Winter Stagecoach

Detail For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.

Response The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).

Proposed Change Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20035	Objection	Policy:	42	
094	Cllr Betton			
Detail	As I mentioned in the first stage of consultation there is no mention of a health centre for the Botcherby area in the plan. It costs families and residents of Botcherby a fortune to visit separate centres quite a distance away. If there is going to be more housing development in our area then that will provide a need for dentists, doctors and other health professions based under one roof. A suitable location would be on the old coop site in Botcherby.			
Response	The role of this Local Plan Policy is to guide the development of medical facilities towards the most appropriate locations. Whilst the Local Plan can help in the identification and allocation of new sites for the provision of such medical facilities, it is not the role of the Local Plan to provide these services. It is therefore not the place of the Local Plan to allocate new sites for such need speculatively however if it is considered by medical professions/NHS that new services are required, the Local Plan will play a supportive role in their development.			
	It should be noted that there has been significant dialogue with our health partners and work is ongoing to identify any health infrastructure that may be required as a result of new development. This will be highlighted within the Infrastructure Delivery Plan.			
Proposed Change	No proposed change in response to this comment.			
20369	Objection	Policy:	42	
121	Mike Fox	Brampton Economic Partnership		
Detail	Same as original submission 0563 Concerns regarding the sudden designation of a major site for an eccentric medical centre to the south west of the centre. No addressing of the significant draining of use of the centre of Brampton and its businesses, if the medical centre is located 'out of town';			
Response	One of the main reasons for the allocation of a new medical centre is that the current surgery is no longer fit for purpose. Whilst the current position within the centre of Brampton is ideal, its nature as a historical market town has meant that there are limited opportunities for the surgery to expand. The creation of a new medical centre would allow for new modern facilities and adequate parking to be achieved. Brampton Medical Practice is supportive of this site having considered a number of other sites in previous years. Bus provider Stagecoach has suggested that whilst there is not a route passing the site at present, this is something that could be achieved. This will help to improve the accessibility of this site. Whilst it is recognised that a number of patients visiting the current doctors surgery within the centre of Brampton will go on to use other facilities in the town centre, there is no evidence to suggest that this would not continue to happen or that visitors to the proposed doctors surgery would not then go into the centre of Brampton to shop. It may in fact relieve some of the parking issues within the centre.			
Proposed Change	No proposed change in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20362	Objection	Policy: 42	182	
154/26/27	Mr Bryan Craig			
Detail	The first sentence in this policy is too restrictive. It is likely that in the future a new Medical Centre may be built in Dalston but how will the people from Raughton Head, Gaitsgill, Wreay, Ivegill, Welton, Sebergham, Brough, Kirkandrews and Great Orton access it by public transport when there is none.			
Response	Comments are noted however it is the intention of criteria 1 to ensure that the development of new medical facilities are in the most sustainable and accessible locations, like Carlisle, Brampton, Longtown and Dalston. Whilst it is recognised that more rural locations have very limited access to public transport, it is important that in the first instance the Policy directs this type of development to those settlements that are accessible by the greatest number of people. For example, in terms of sustainability, it is unlikely that a doctors' surgery or health centre would be likely to set up in one of the more remote rural settlements as accessibility by public transport would be much reduced.			
Proposed Change	No proposed change in response to this comment.			
20744	Objection	Policy: 43		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1031 amendments made to reflect comments. Additional Comments made with no specific Suggested change: Additional comments: As the responsible Education Authority, Cumbria County Council has undertaken an assessment of the impact of proposed housing development on school places throughout Carlisle (Appendix E). This assessment will consider the cumulative effects of development on schools. By doing so, this paper will help refine the selection of development sites and establish a basis for seeking necessary contributions (e.g. planning obligations and S106) to help ensure the plans deliverability.</p> <p>To meet the effects of proposed developments, this assessment highlights the potential need for more primary and secondary school places in different parts of the Carlisle City Council authority area. In particular development sites to the north of the River Eden in Carlisle need to be carefully considered. The provision of additional primary school places here presents challenges and is likely to necessitate the provision of a new primary school to be funded either by planning obligations or Community Infrastructure Levy.</p> <p>This education assessment which is contained in Appendix E to this report, should be reflected within the Infrastructure Delivery Plan. Moving forward, the County Council is happy to work with Carlisle City Council to further develop this evidence.</p>			
Response	Comments are noted. Policy 43 Educational Needs will be updated to reflect Appendix E to the Education Authority report.			
Proposed Change	No proposed change as a result of this comment but Policy will be reviewed in light of Appendix E.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20597	Comment	Policy: 43	8.9	184
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	Effects of proposed developments there may be a requirement for more primary education –contradicts 3.38 as this states that there already is a shortage of school places and that the primary schools are at capacity. The solution is very “washy” see 8.12 or 8.13 – reiterate no further developments in rural villages where there is no provision for primary education unless a defined strategy is provided.			
Response	<p>General Comment: Primary and Secondary Education should be reviewed with the cumulative effect of all proposed development throughout the DISTRICT not by Parish/village, an Education Establishment Master Plan should be developed based on a urban / rural split increase in the number of homes 8342/3201 2015-30 between the District and the County Council and this should form part of the local plan NOT a reference to “a strategy” it needs to be definitive.</p> <p>Carlisle South including the Morton Development with the allocated sites create a band around the south west of the city totaling over 1300 new homes; there is a requirement for the County Council to ensure that the developers contribute towards primary and secondary education prior to the completion of these new estates.</p> <p>It is acknowledged that currently nearby local primary schools are full. However, the Local Plan is looking ahead to 2030. It would be unsustainable to say that there should be no further development in rural villages where there is no provision for primary education as it is acknowledged that villages work in clusters and so development in one village can help to sustain the services, such as a school, in a village nearby.</p> <p>Carlisle City Council and Cumbria County Council have been working closely in relation to establishing what education infrastructure would be required in order to support the levels of development identified across the Plan area. The County Council have put together their ‘Proposed Approach to Education Infrastructure’ in response to the Local Plan Proposals (April 2014). This document considers the current position with regard to existing education provision, the potential education needs arising from the proposed land allocations across the District and possible steps to achieve appropriate mitigation of these effects. It also highlights locations where existing schools may not have sufficient spaces to address the impact of proposed development and thus where further school capacity will be required. It states that where additional school places are required the County Council will seek to secure their provision through the use of developer contributions (e.g. S106 and CIL).</p> <p>In terms of the County Council response, it states that while there may be school places across the City, it needs to be remembered that these spaces are not necessarily in the right location, i.e. the developments are not in the catchment of the schools with projected spare capacity. The County Council would seek to accommodate children from new developments, either through the large scale expansion of existing schools, or through the provision of new school/schools through the planning system using S106 or CIL.</p> <p>The options to provide extra capacity may include major expansions/redevelopment of current schools to provide additional forms of entry or provision of new school(s) in an appropriate location(s). The County Council will work with the City Council, Local Members and the schools themselves for the provision of additional education facilities in Carlisle.</p> <p>With regards to Morton, a site for a primary school has been provided as well as a contribution towards its development. Secondary school provision is available for these children at Richard Rose Morton Academy. Looking further ahead in relation to Carlisle South, the County Council have identified the levels of education infrastructure that would be required up to 2030 and have highlighted that the delivery mechanism for this would be through developer contributions.</p>			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20573	Objection	Policy: 43	8.9	184
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Effects of proposed developments there may be a requirement for more primary education – highlighted Cumwhinton, Scotby Wetheral,- contradicts 3.38 as this states that there already is a shortage of school places and that the primary schools are at capacity. Re-iterate there should be no further developments in rural villages where there is no provision for primary education unless a defined strategy is provided. Any proposed housing must be linked to education needs provision, which should be as local as possible to avoid unnecessary transport/car journeys.</p> <p>Additioanl comments: 1)Primary Education; schools in Wetheral Parish are at capacity, based on the 2011 census there are 415 children 5-9 years old. The current school places total 495 .This is Great Corby, Cumwhinton &amp; Scotby. ( Not all of the pupils are within the catchment of the schools and many travel in from other parts of the city)</p> <p>The cumulative effect of the preferred housing allocations in the whole parish including the developments with planning consent total 342 new homes. Using a rough calculation based on the County Council Planning Policy 2012.( no of houses x 37.9%)</p> <p>If 342 3 bedrooms houses were build this would produce an extra 130 pupils (aged 5-15) the current breakdown of 5-9 = 415, 10-15=330. Therefore if 50% of the children is likely to be an extra 65 primary age pupils, this would not trigger the 150 for a new school, so the District Council insist that the County Council ensure that developers within the Parish contribute to the provision of a new school in Wetheral within the next 5 years. This should be included in the local plan.</p> <p>Primary and Secondary Education should be reviewed with the cumulative effect of all proposed development throughout the DISTRICT not by Parish/village, a strategy should be developed based on a urban / rural split increase in the number of homes 8342/3201 2015-30 between the District and the County Council and this should form part of the local plan NOT a reference to " a strategy" it needs to be definitive.</p>			
Response	<p>It is acknowledged that currently nearby local primary schools are full. However, the Local Plan is looking ahead to 2030. It would be unsustainable to say that there should be no further development in rural villages where there is no provision for primary education as it is acknowledged that villages work in clusters and so development in one village can help to sustain the services, such as a school, in a village nearby.</p> <p>Carlisle City Council and Cumbria County Council have been working closely in relation to establishing what education infrastructure would be required in order to support the levels of development identified across the Plan area. The County Council have put together their 'Proposed Approach to Education Infrastructure' in response to the Local Plan Proposals (April 2014). This document considers the current position with regard to existing education provision, the potential education needs arising from the proposed land allocations across the District and possible steps to achieve appropriate mitigation of these effects. It also highlights locations where existing schools may not have sufficient spaces to address the impact of proposed development and thus where further school capacity will be required. It states that where additional school places are required the County Council will seek to secure their provision through the use of developer contributions (e.g. S106 and CIL).</p> <p>In terms of the County Council response, it states that while there may be school places across the City, it needs to be remembered that these spaces are not necessarily in the right location, i.e. the developments are not in the catchment of the schools with projected spare capacity. The County Council would seek to accommodate children from new developments, either through the large scale expansion of existing schools, or through the provision of new school/schools through the planning system using S106 or CIL.</p> <p>The options to provide extra capacity may include major expansions/redevelopment of current schools to provide additional forms of entry or provision of new school(s) in an appropriate location(s). The County Council will work with the City Council, Local Members and the schools themselves for the provision of additional education facilities in Carlisle.</p> <p>In relation to Wetheral, the Education Authority has advised that this development will impact on 1 foundation CE primary school (Scotby CE Primary School, Scotby) and</p>			



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1 secondary academy (Richard Rose Central Academy, Carlisle). It is projected that the proposed allocations would result in an additional 20 primary aged pupils and 14 secondary aged pupils. The existing primary school is projected to be full; meaning developer contributions will be required to ensure appropriate mitigation can be provided. This highlights that the Education Authority do not expect that a new school will be required in Wetheral over the Plan period.

With regards to secondary aged children, the catchment secondary school is Richard Rose Central Academy. When assessing school places, based on an 11 year average, there are considered to be 48 spaces available at this school. When the 205 pupils expected from the existing permissions are deducted (61 from Carl 21, Carl 22, Scot 2 and Cumw 3 and 144 from sites to north of city), the availability of school places falls to 243. On this basis there is anticipated to be a shortage of 6 secondary school places to meet the effects of development (243 places – 249 pupils). To address this, there will be a requirement for developer contributions to provide appropriate mitigation.

Proposed Change  
No proposed change.

20745 Comment Policy: 44

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 1032 no amendments made. Stage 2 comment:  
We have no comment on this policy.

Response Comment noted.

Proposed Change No proposed change.

20060 Comment Policy: 44

043 Nigel Winter Stagecoach

Detail For each policy referred to [Spatial Strategy; S1-S7 Inc Economy; Policy 1-8 Inc & policy 10 and 11. Infrastructure; Policy 30 & 36. Health, Education and Community; Policy 42 & 44] add 'promote and support sustainable road passenger transport' to each.

Response The Plan read as a whole ultimately determines what will or will not constitute sustainable development within the district of Carlisle, and as such it is not considered necessary or appropriate to include the suggested reference within each and every one of the policies referred to. Notwithstanding that adequate provisions with regards to promoting and supporting sustainable public transport are already considered to be included within the Plan as drafted, through for example Policy 31, consideration is being afforded to including a strategic transport policy upfront within the Plan, which if included would provide a good opportunity to explicitly acknowledge the strategic importance of promoting and supporting sustainable public transport (which would include sustainable road passenger transport).

Proposed Change Ensure reference is made to promoting and supporting sustainable public transport within any strategic transport policy included in the Plan.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20574	Objection	Policy: 44		
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Change of use policy 44 – Facilities & services – It is important to consult Parish Councils			
Response	Parish Councils are currently consulted when this type of application is received. This process would continue.			
Proposed Change	No proposed change.			
20746	Support	Policy: 45		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1033 supported the policy. Support re-submitted: This policy, which seeks to ensure those with mobility challenges can easily access buildings is supported.			
Response	Comment of support noted.			
Proposed Change	No proposed change.			
20747	Support	Policy: 46		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1034 amendments made to reflect comments. Stage 2 support changes: Crime and the fear of crime can create significant costs for communities both in terms of physical and mental harm but also financially. This policy, which sets out principles developments should adhere to minimise the risk of crime is broadly welcomed. We also welcome the fact that the previous advice of the County Council has been reflected in the policy.			
Response	Comment of support noted.			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20748	Comment	Policy: 47		
194	Michael Barry	Cumbria County Council		
Detail	No Stage 1 Comment. Stage 2 Comment: This policy looks to ensure development does not impact on safeguarding zones, and is noted and no comments are provided.			
Response	Comment noted.			
Proposed Change	No proposed change.			
20076	Support	Policy: 47		
020		Essar Oil (UK) Ltd	A005	
Detail	On behalf of our clients, Essar Oil (UK) Ltd, Bell Ingram monitors the progress of Development Plans along the route of the North West Ethylene Pipeline which passes north-south through the Council area. We note that in response to our comments on the Preferred Options consultation Stage 1, Policy 47 - Safeguarding Zones & Appendix 2: map of North West Ethylene pipeline now makes reference to Essar Oil (UK) Ltd Major Accident Hazard Pipeline. We support the inclusion of this reference in the interests of safeguarding the route of the North West Ethylene Pipeline which passes through the Council area. We agree that the Policy and Appendix Map will help to make planning officers and developers aware of the pipeline route when promoting land allocations and/or planning applications.			
Response	Comment of support for Policy noted.			
Proposed Change	No proposed change.			
20749	Support	Policy: 48		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1035 supported the policy. Support re-submitted: This policy, which seeks to minimise environmental pollution from development, is supported.			
Response	Comment noted.			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20337	Objection	Policy: 48		
062		Church Commissioners for England	A013	
Detail	Whilst it is acknowledged that pollution is an important consideration with regard to future development, this would be addressed via a conditional consent. It is therefore considered that this policy is not needed and can be deleted from the Local Plan.			
Response	Comment is noted however it is considered that a policy on Pollution within the Local Plan provides direct reference for Environmental Health and Planning Officers to use when determining planning applications and adding conditions. It is important that the potential impact of a development on pollution within the District is fully considered at a Local Level. Consideration will be given to the merger of Policy 48 - Pollution, Policy 49 - Protection of Groundwaters and Surface Waters, Policy 50 - Hazardous Substances and Policy 51 - Land Affected by Contamination.			
Proposed Change	No proposed change in response to this comment however the Policy has been amended as a result of the National Planning Practice Guidance.			
20750	Comment	Policy: 49		
194	Michael Barry	Cumbria County Council		
Detail	No Stage 1 Comment. Stage 2 Comment: This policy is noted and no comments are provided.			
Response	Comment noted.			
Proposed Change	No proposed change.			
20751	Support	Policy: 50		
194	Michael Barry	Cumbria County Council		
Detail	This policy seeks to ensure that development is not a risk or creates a risk due to the presence of Hazardous Substances. This policy is considered appropriate.			
Response	Comment noted.			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20752	Support	Policy:	52	
194	Michael Barry	Cumbria County Council		
Detail	This policy sets out the principles to be used to guide the identification of a new cemetery. The principles set out are all important and this policy is therefore considered to be appropriate.			
Response	Comment noted.			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent

## Stage 2 Chapter 09

20542 Comment Policy: 53

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

**Detail** Carlisle's heritage and the historic landscape. In furthering these objectives it would be appropriate for the LP to seek to minimise the visual impact on the World Heritage Site and its Buffer Zone resulting from the height of any proposed development. This may be achieved through requiring robust justification for proposals exceeding a height of, for example, 10-12 metres that are not for essential vertical infrastructure, or agricultural silos, the visual impact of which may be somewhat mitigated through requiring the use of non reflective low visibility finishes.

Administered by the Hadrian's Wall Trust (HWT), the World Heritage Site attracted significant investment in local rural, and indeed urban, commercial enterprises. As a member of the local authority partnership that funded the Hadrian's Wall Trust (HWT), it is imperative that Policy 53 be amended to take into account the trusts recent closure and the negative impact this may engender.

This imperative extends also to other tourism related policies which relate to, and respect, the World Heritage Site's importance to the local economy. LP policies should introduce pro-active but sensitive measures that will encourage a continuing inflow of tourist spend, derived not only from the WHS but also from promotion of the wider rural area's history and heritage.

**Response** In respect of the closure of the Hadrian's Wall Trust and any potential negative impacts that could result we do not agree that this should be recognised within policy 53 or any other tourism related policies within the Local Plan. This matter falls outwith land use planning and is therefore not a consideration for the Local Plan.

**Proposed Change** No change required as a result of this objection.

20753 Support Policy: 53

194 Michael Barry Cumbria County Council

**Detail** This policy concerns the consideration of development proposals within the World Heritage Site Buffer Zone. This establishes principles to be applied when considering development within this area and it is considered to be appropriate.

**Response** Support noted

**Proposed Change** No change required.

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20675 Objection Policy: 53 211

104 Emily Hrycan English Heritage North West

Detail

We welcome a separate policy for the Wall and that it follows a three tier approach.

A) The current policy needs to be amended to be more closely aligned with the requirements of the NPPF specifically in using the terms "substantial" and "less than substantial" harm rather than "unacceptable impact" and "adverse impact" which does not afford it the same protection as that advocated by the NPPF.

Therefore, it is recommended that each paragraph in this policy should be amended to ensure that "substantial harm to the significance including setting will not be permitted and less than substantial harm will need to be balanced against public benefit needs as in the NPPF. The policy should be amended to closely relate to the requirements of the NPPF using "harm" and "substantial harm" rather than "unacceptable impact" and "adverse impact".

B) Paragraph 2: With regards WHS the aim of the policy should be to protect the Outstanding Universal Value, which includes key visual relationships and therefore the reference to "key views" should be deleted.

C) Paragraph 4: The World Heritage Site is a wide frontier zone, rather than a single wall and whilst it is admirable to put in an intention to prevent open sites being built upon, this needs to apply to the frontier zone rather than the Wall itself.

The policy also needs to make reference to the fact that development should not normally be permitted, as there will be times where there may be other historic environment reasons may need to be taken account and not just the Wall.

D) The Policy fails to deal with non-designated archaeological remains relating to the Hadrian's Wall frontier and which are of the same significance as the Wall (NPPF Para 169).

The policy needs to be amended to deal with non-designated archaeological remains of the WHS.

E) Para 9.3: In addition to the values listed in this paragraph, "historical and archaeological" should be inserted here.

Insert "It has significant historical and archaeological value, as well as being important recreationally, socially and economically"

F) Para 9.6: Not all parts of the Frontier are within the Buffer Zone and therefore, this should be amended.

G) Although we welcome the commitment of the Council to protecting the WHS. The Plan as a whole needs to reinforce the WHS and the positive impacts of having one in the District.

Both in this section and in the portrait of the District and individual areas, a better description of the WHS should be made.

The extra detail of this archaeology and significance should be enhanced considering it is so strategically important.

A better description of the WHS and what is unique to the area. The importance of it and an assessment of the contribution it makes to Carlisle District needs to be made here and throughout the Plan.

In particular, the extra detail of the strategically important archaeology should be made clear and conserved and enhanced in line with the requirements of the NPPF.

Response There has been a joint policy approach taken under the duty to co operate to developing the Local Plan policy for Hadrian's Wall World Heritage site between all the Districts which it crosses. It is therefore not considered necessary or appropriate to significantly alter the wording which would result in deviating from the agreed approach, it is however agreed that the wording could be more closely aligned with the terminology used within the NPPF.

In respect of the requirement for a better description of the WHS this will be included in a strategic historic environment policy.



RepNo	Status	Paragraph	Page	Stage 2 Map:
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Proposed Change	<p>Amend policy to read: There is a presumption in favopur of preserving the fabric, intergity and authenticity of archaeolgical sites, including non designated archaeological remains, that form part of the outstanding universal value of the World Heritage Site. Development will not be permitted where it would cause substantial harm to Hadrian's Wall World Heritage Site and its setting.</p> <p>Proposed development in the Buffer Zone should be assessed for its impact on the Outstanding Universal Value of the World Heritage Site, development that would cause substantial harm to the Outstanding Universal Value should be refused.</p> <p>Proposed development outside the boundaries of the Buffer Zone will be carefully assessed for their effect on the Ouutstanding Universal Value, and any that would have an adverse effect on it should be refused.</p> <p>New development will not be permitted on currently open land within the frontier zone. New development within the Hadrian's Wall Frontier Zone which enhances or better reveals its significance wil be supported.</p> <p>Amend paragraph 9.3 second sentence to read: it has significant historical and archaeological value as well as being important recreationally, socially and economically.</p> <p>Paragraph 9.6 .....although some of them lie within the buffer zone.</p>			
20754	Objection	Policy:	54	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1036 amendements made. Amended Comments and suggested change submitted:</p> <p>While we welcome the changes have been made to the policy following the earlier advice of Cumbria County Council, we wish to provide further advice.</p> <p>The name of this policy describes Scheduled Ancient Monuments and Other Nationally Important Ancient Monuments. However, the term Other Nationally Important Ancient Monuments is not used in NPPF or the planning system and is a misnomer. Policy 54 refers to Scheduled Ancient Monuments and non-designated archaeological remains and we suggest the name of the policy is reworded so that it clearly reflects this.</p> <p>Suggested Changes</p> <p>The name of this policy should be revised to state: Policy 54 - Scheduled Ancient Monuments and non-designated archaeological remains.</p>			
Response	Agree that the policy title be amended to ensure consistency in terminology with the NPPF in respect of non designated heritage assets.			
Proposed Change	Amend title of policy to read: Scheduled Ancient Monuments and non-designated archaeological remains.			
20220	Support	Policy:	54	
077	Mr Alan Hubbard	National Trust		
Detail	The amendment to the first sentence to refer to 'or their setting' is noted, welcomed, and suitably addresses the concern previously raised by National Trust.			
Response	Support noted			
Proposed Change	No change required			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20676	Objection	Policy:	54	213
104	Emily Hrycan	English Heritage North West		
Detail	<p>Paragraph 1: Reference to substantial harm should be used here rather than unacceptable harm. Which would be in line with the NPPF. With regards nondesignated assets, the paragraph should be amended to make it clearer that the Council's preference will be that preservation is the preferred option but if this is not justified then other parts of the policy will apply. Notwithstanding the above, proposals that affect nondesignated assets of archaeological interest will be judged on the significance of the assets and the scale of harm to establish whether the development is acceptable in principle. As its preferred option, the Council will seek to avoid damage to such remains through the preservation of archaeological remains in-situ. When in-situ preservation is not justified, the developer will be required to make adequate provision for excavation, recording, analysis and publication of assets t a level that is proportionate to their significance and to the scale of the impact of the proposal. This information will need to be made publicly accessible in the County's Historic Environment Record and published appropriately if the results merit this".</p> <p>Paragraph 3: This paragraph needs to be amended to be clear that the process of archaeological assessment and evaluation applies not only to sites where there are ground for believing there is an archaeological potential but also where there is knowledge that there are archaeological remains but where their significance, extent and state of preservation is not clear.</p>			
Response	Agree to amend the policy as suggested.			
Proposed Change	<p>Amend policy to read:Development will not be permitted where it would cause substantial harm to the significance of a scheduled Monument, or other nationally important non designated site or assets of archaeological interest or their setting. Notwithstanding the above, proposals that affect non designated assets of archaeological interest will be judged on the significance of the assets and the scale of harm to establish whether the development is acceptable in principle. As its preferred approach, the Council will seek to ensure mitigation of avoid damage to such remains through the preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording and analysis of assets by the developer to a level that is proportionate to their significance and to the scale of the impact of the proposal. The information will need to be made publicly accessible in the County's Historic Environment Record .and published appropriately if the results merit this. Proposals that will have an impact on an area where there are reasonable grounds for the potential of unknown assets of archaeological interest to be, or where there is knowledge that there are archaeological remains, should be accompanied by an assessment of the significance of the asset and how that significance will be affected by the proposed development including where their sigbificance, extent and state of preservation is not clear. The level of information required will be proportionate to the assets significance and to the scale of impact of the proposal, and may require, where necessary, archaeological desk-based assessment and field evaluation.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20509 E2	Comment	Policy:	55	
158/33	Mrs Julie Templeton			
Detail	I would like to see the Local Listing of locally significant buildings brought up to date and that the Percy Dalton complex of the old Fire Station, old Police Station, Magistrate's Court and the firemen's house in Warwick Street be included in this list. I also believe that the terraced houses in Corporation Road and Peter Street should be protected by being included in this list. The Civic Centre is a gateway building that is recognised throughout the area. It is one of the few buildings representative of its time and should be included in the list.			
Response	The Local List is a register of buildings of local significance and as such will continue to be added to and amended. Work is ongoing to further develop it. Some of the buildings you mention are of notable quality and local significance therefore consideration will be given to their eligibility for inclusion. In line with draft Local Listings policy (policy 55) consideration will be given to the inclusion of buildings deemed eligible for inclusion on the Local List within the Rickergate area. The City Centre masterplan will identify buildings of note and will therefore help inform whether or not certain buildings should be incorporated on the Local List.			
Proposed Change	Amend policies map where appropriate and in line outcomes of City Centre masterplan, to add key townscape frontage designation to significant local heritage assets within Rickergate area (SPEAK TO ROGER).			
20543	Objection	Policy:	55	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	These state that development or demolition which would remove, harm, or undermine the significance of a locally listed asset; or its contribution to the character of the area; or cause substantial loss to the significance of a building or feature; will be permitted only where the harm is outweighed by the public benefits of the proposal. In the interests of clarity and for the avoidance of doubt it would be appropriate for the LP to require, "robust evidence that the harm is outweighed by the public benefits" It would be advantageous to make clear that the protection afforded by the above policies applies to the entire curtilage of a listed building or structure and/or any building or structure within a conservation area.			
Response	Agree that the wording be strengthened along the lines suggested.			
Proposed Change	Amend second paragraph of policy to read: Development which would remove, harm or undermine the significance of a locally listed asset, or its contribution to the character of the area will only be permitted where robust evidence can be provided to demonstrate that the public benefits of the development would outweigh the harm.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20236	Objection	Policy: 55		
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>The conservation and protection of buildings relies greatly on their inclusion in the Local Listing. This would be fine if the Local Listing was adequate. However, this list stands in desperate need of revision and updating. It does not appear to have been added to since 1994. There are many buildings of local significance which are not on it, particularly those of 20th century date. SOS is particularly concerned about the complex of Laing/Dalton buildings comprising the old Fire Station, old Police Station, Magistrate's Court and firemen's houses in Warwick Street and also the Civic Centre. The terraced houses in Corporation Rd and Peter St should also warrant protection. Why is the Sands Centre on this list when the Civic Centre is not?</p> <p>9.20 Key Townscape Frontage. Both sides of Warwick Street – the houses and the old fire/police stations and magistrate's court should be designated. They have strong local significance as being a good example of the design and build partnership of Laing and Dalton. SOS would also like to see Corporation Road and the north end of Peter Street designated</p>			
Response	<p>The Local List is a register of buildings of local significance and as such will continue to be added to and amended. Work is ongoing to further develop it. Some of the buildings you mention are of notable quality and local significance therefore consideration will be given to their eligibility for inclusion. The Sands Centre is not included as a key townscape frontage building it is identified on the draft policies map as Art, Culture Leisure and Tourism. In line with draft Local Listings policy (policy 55) consideration will be given to the inclusion of buildings deemed eligible for inclusion on the Local List within the Rickergate area. The City Centre masterplan will identify buildings of note and will therefore help inform whether or not certain buildings should be incorporated on the Local List.</p>			
Proposed Change	<p>Amend policies map where appropriate and in line outcomes of City Centre masterplan, to add key townscape frontage designation to significant local heritage assets within Rickergate area(SPEAK TO ROGER).</p>			
20677	Objection	Policy: 55	213	
104	Emily Hrycan	English Heritage North West		
Detail	<p>This policy would benefit from a textual amendment to the title "Local Listings". It would be preferable to read "Locally-important heritage assets", this would ensure that all heritage assets that are undesignated would be given consideration and not just those that have been included on a local list.</p>			
Response	<p>Agree that the title of the policy could be amended as per comments received - however the policy intentionally specifically relates to assets that are included on a local list. The intention of the Local Listings policy is to make a distinction and afford greater protection to those buildings/structures that are considered to be of greater local significance to warrant their inclusion on the List. Other heritage assets are afforded their own policies within the Historic Environment chapter, where appropriate, and therefore do also require inclusion within policy 55.</p>			
Proposed Change	<p>Amend title of policy to read: Locally-important heritage assets.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20755	Support	Policy: 56		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1038 amendments made to reflect comments. Stage 2 support changes: The establishment of a policy that sets out how development in Conservation Areas is considered is important. We welcome the amendments to the policy in light of the earlier advice of the County Council.			
Response	Support noted			
Proposed Change	No change required			
20575	Comment	Policy: 56		
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	There should be some method to prevent development different in character to the buildings in a conservation area or close to the boundary.			
Response	The intention of policy 56 is to preserve and enhance those aspects of a conservation area that make a positive contribution to their special character and appearance. Therefore the policy recognises that proposals within or adjacent to a conservation area should seek to harmonise with their surroundings and respect the physical characteristics of the conservation area. In respect of a method of preventing development different in character to buildings within a conservation area the proposed criteria within the policy would be used to judge the appropriateness of a proposal setting out the key aspects that should be given consideration in order to assess whether or not a scheme would be acceptable in respect of the conservation area. It is not the intention to stifle innovation in design but recognise the important aspects of a designation and ensure that proposals do not have a negative impact on the special character of the area.			
Proposed Change	No change proposed to policy as a result of this comment.			
20371	Objection	Policy: 56		
121	Mike Fox	Brampton Economic Partnership		
Detail	Same as original submission 0565 There is an absence of considerations of conservation matters for the centre of Brampton.			
Response	This objection was also submitted at the preferred options stage 1 consultation. The suite of conservation policies are applicable to all areas and structures of heritage significance therefore are relevant to heritage matters in Brampton. In addition to the Local Plan and the reference it makes to heritage matters there is the Brampton Conservation Area appraisal which provides a greater level of detail - this information does not need to be replicated within the Local Plan, however reference to the appraisal can be included within the Conservation Areas policy.			
Proposed Change	Include reference to Brampton Conservation Area Appraisal within policy 56 paragraph 9.25.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20237	Objection	Policy: 56		
o88	Elizabeth Allnutt	Save Our Streets		
Detail	Planned landscape areas – eg Bitts Park, Chatsworth Square are included in the Conservation Areas. While new Policy 58 covers these they should also be referenced here for the contribution they make to conservation areas.			
Response	Agree that these areas make a significant contribution to the conservation areas in which they are situated, however reference to them would be better placed within the strategic heritage policy that is proposed to be included in the publication draft of the plan.			
Proposed Change	Include reference to areas of planned green space within conservation areas, realising the important contribution they make to the character and setting.			
20678	Support	Policy: 56	221	
104	Emily Hrycan	English Heritage North West		
Detail	The NPPF requires that plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. We welcome the inclusion of a separate policy on conservation areas. This policy would benefit from the Plan having made a proper detailed assessment of the historic environment in the Borough (see previous comments) to inform this policy.			
Response	It is proposed that a strategic heritage policy be written to set out the Council's strategy for heritage within the District. This should provide, along with the relevant sections of the spatial portrait, a more detailed assessment of Carlisle's significant heritage assets and the District heritage priorities.			
Proposed Change	No change proposed as a result of this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20679	Objection	Policy: 57	221	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The NPPF requires that plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. We welcome the inclusion of a separate policy on conservation areas.</p> <p>Paragraph 1:</p> <p>This paragraph does not particularly accord with the requirements of the NPPF with regards substantial harm to the significance of a listed building and its setting being wholly exceptional. Minimising the loss of any significance should therefore be amended.</p> <p>Enhancement to the significance of listed buildings as well as preservation should be equally promoted.</p> <p>Reword to: "Listed buildings and their settings will be preserved and enhanced. The harm to significance will not be permitted and will only be justified where the public benefits of the proposal outweighs the significance".</p> <p>Bullet 1:</p> <p>In line with the NPPF, it is the significance of a heritage asset and not the importance of which is a consideration in determining an application affecting one.</p> <p>Bullet 1 should be amended to read: "The significance of the heritage asset...."</p> <p>Demolition of listed buildings:</p> <p>The proposals put forward here appear to weaken the protection afforded to listed buildings in the NPPF and allows proposals which will result in the demolition of a listed building. The NPPF, requires LPAs to refuse consent for proposals which cause substantial harm to or total loss of the significance of a heritage asset unless it can be demonstrated that the loss is necessary to achieve substantial public benefit.</p> <p>This policy does not accord with the NPPF, and needs to be amended.</p> <p>The policy puts forward a list of criteria that if met will support the demolition of a heritage asset and this should be deleted. Indeed the quality of a development scheme should not be apt of a justification for demolition.</p> <p>The Policy should be amended to read: "Demolition or total loss of the significance of a designated heritage asset will only be permitted in exceptional circumstances".</p>			
Response	<p>Agree that the NPPF is more strongly worded and that the criteria in the draft policy do not reinforce as strongly the protection that should be afforded to Listed Buildings. Therefore it is proposed that the policy wording be amended to closely reflect the suggestions put forward.</p>			
Proposed Change	<p>Amend policy 57 to read: Listed buildings and their settings will be preserved and enhanced. The harm to significance will not be permitted and will only be justified where the public benefits of the proposal outweigh the significance.</p> <p>Amend criterion 1 to read: the significance .....</p> <p>Demolition of listed buildings: There will be a strong presumption in favour of the preservation of listed buildings. Development proposals which would result in the total or substantial demolition of a listed building should be exceptional and will be refused consent other than in circumstances where it can be demonstrated that the tests set out in the NPPF can be met.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20221	Objection	Policy: 58		
077	Mr Alan Hubbard	National Trust		
Detail	<p>The National Trust does not object to the approach now put forward to separate out into individual policies the approaches to Listed Buildings, Registered Historic Parks and Gardens and Historic Battlefields.</p> <p>However, it does consider that the wording in respect of Registered Historic Parks and Gardens and their settings is muddled and contains a typographical error. A suggested re-wording is set out below.</p> <p>Policy 58- Historic Parks and Gardens Proposals affecting an historic park and garden or it's setting should ensure that the development does not detract from the enjoyment, layout, design character, or appearance of that landscape, cause harm to key views from or towards these heritage assets or, where relevant, prejudice their future restoration.</p>			
Response	Agree that the policy could be improved, amendments propped in light of comments received.			
Proposed Change	Amend policy to read: Proposals that cause harm to the significance of a designated park and garden will not be permitted. Opportunities for their conservation and enhancement will be supported and proposals which restore them will be promoted. Proposals affecting an historic park and garden should ensure that development does not detract from the enjoyment, layout, design character, appearance or setting of that landscape, cause harm to key views from or towards these landscapes or, where appropriate, prejudice their future restoration.			
20680	Objection	Policy: 58	221	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The list provided within this policy does not necessary apply to all registered parks and gardens. So it may be appropriate to state that development should not harm the significance of a designated park and garden. The list could be included to help understand different areas of significance that make up a garden but not necessary be a prescriptive list to be used to determine an application.</p> <p>Suggested wording: "Proposals that cause harm to the significance of a designated park and garden will not be permitted. Opportunities for their conservation and enhancement will be supported and proposals which will restore them will be promoted....."</p> <p>Proposals affecting a historic park and garden should ensure that development does not detract from the enjoyment, layout, design character, appearance or setting of that landscape, cause harm to key views from or towards these landscapes or, where appropriate, prejudice their future restoration.</p>			
Response	Agree that policy be amended to make it more appropriate in line with the comments made by English Heritage.			
Proposed Change	Amend policy to read: Proposals that cause harm to the significance of a designated park and garden will not be permitted. Opportunities for their conservation and enhancement will be supported and proposals which restore them will be promoted. Proposals affecting an historic park and garden should ensure that development does not detract from the enjoyment, layout, design character, appearance or setting of that landscape, cause harm to key views from or towards these landscapes or, where appropriate, prejudice their future restoration.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20681	Objection	Policy:	59	222
104	Emily Hrycan	English Heritage North West		
Detail	<p>Battlefields are afforded the highest significance in the NPPF in line with WHS, Grade I and II* listed buildings and scheduled monuments. This policy should recognise this. The significance of a battlefield is of the utmost importance and not just the historic, archaeological and landscape interest of the site. Therefore, this policy should be amended accordingly.</p> <p>Suggested wording: "Proposals affecting the Registered Battlefield of the Battle of Solway Moss will not be permitted where it adversely affects its significance including the historic, archaeological or landscape interest of the site including potential for interpretation. Any opportunities for interpretation will be supported".</p>			
Response	Agree that this policy should be amended in line with suggested changes.			
Proposed Change	Amend policy to read: Proposals affecting the site or setting of a Registered Historic Battlefield, will not be permitted where it adversely affects its significance including the historic, archaeological or landscape interest of the site including potential for its interpretation. Any opportunities for interpretation will be supported.			
20215	Objection	Policy:	n/a	
077	Mr Alan Hubbard	National Trust		
Detail	<p>It is noted that the wording of this Objective is unchanged and it remains the Trust's view that it represents an unbalanced and lesser approach to heritage assets than that taken in the other objectives such as those relating to economic development. It is unclear why an inconsistent approach is being pursued and in the absence of any explanation the Trust maintains its objection; i.e.:</p> <p>A different approach is taken in the heritage (and green infrastructure) objective to the others by the inclusion of caveats which do not exist elsewhere; e.g. the economy objective does not say "To create opportunities for economic growth by increasing the working age population, the skills available, the diversity of the economy and the physical infrastructure to deliver it, whilst ensuring that the heritage assets and their settings are not adversely affected and bio-diversity is protected and enhanced."</p> <p>The Objective for heritage should similarly be 'purely' stated given its key role in the delivering of sustainable development.</p> <p>It is noted that a similar issue was raised by the Trust in respect of the Green Infrastructure Objective and that has been satisfactorily addressed.</p> <p>Request: Amend the wording as previously suggested; i.e.:</p> <p>"Historic Environment – To conserve, enhance and promote Carlisle's heritage including its important historic landscapes and ensuring that development proposals are sympathetic to the elements that make Carlisle and Cumbria special."</p>			
Response	Agree that the objective should be amended to remove reference to maximum social and economic benefit. Add additional text to the economy objective to recognise the economic benefits associated with Carlisle's heritage and historic landscape.			
Proposed Change	<p>Amend objective to read: To conserve, enhance and promote Carlisle's heritage including its important historic landscapes and ensure that development proposals are sympathetic to the elements that make Carlisle and Cumbria special.</p> <p>Add additional text to economy objective to recognise the economic benefits of Carlisle's heritage and historic landscapes.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20674	Comment	Policy: n/a	210	
104	Emily Hrycan	English Heritage North West		
Detail	<p>We welcome the inclusion of a section on heritage within the Plan.</p> <p>There has been no proper, accurate assessment of the significance of heritage assets in the area and the contribution they make to the Borough (NPPF, Paragraph 169) to inform this objective or reinforce the statement outlined in Para 9.1.</p>			
Response	<p>The Plan needs to be expanded to explicitly detail the heritage assets in the Borough and to make an assessment of their contribution to the area.</p> <p>It is proposed that a strategic heritage policy be written to set out the Council's strategy for heritage within the District. This should provide, along with the relevant sections of the spatial portrait, a more detailed assessment of Carlisle's significant heritage assets and the District heritage priorities</p>			
Proposed Change	<p>Proposed inclusion of a Strategic heritage policy.</p>			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

# STAGE 2 REPRESENTATIONS

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

## Stage 2 Chapter 10

20756	Comment	Policy:	60	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1040. Comments re-submitted with slight amendment.</p> <p>Suggested Changes</p> <p>It is recommended that the above landscape features should be reflected in the detailed design of individual sites through the Development Management process and in the criteria of Policy 60.</p>			
Response	<p>Noted. However, to include full detailed descriptions of each sensitive landscape listed in your rep would make the policy unwieldy. Instead the policy should be used to signpost to the toolkit. Your wording seeking to ensure landscape features are reflected in the detailed design of individual sites is appropriate however, and will be included within the policy.</p>			
Proposed Change	<p>Include suggested wording, signposting to landscape toolkit.</p>			

20005	Support	Policy:	60	225
160/35	Mrs Catherine Leach	Clerk to Bewcastle Parish Council		
Detail	<p>The PC would like to express their gratitude for the inclusion of Bewcastle in the dark sky area on the periphery of the National Park.</p>			
Response	<p>Acknowledged. It is important that the Northumberland National Park and Kielder Water &amp; Forest Park Dark Sky Landscapes are protected.</p>			
Proposed Change	<p>N/A</p>			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

20757 Objection Policy: 62

194 Michael Barry Cumbria County Council

Detail

Stage 1 Representation No 1042, amendment made. New comments submitted:  
Provision of SuDS within development is expected to require open space to accommodate them. These spaces can also be used to provide space for amenity, recreation and biodiversity.  
The section concerning Internationally Designated Sites does not appropriately reflect the requirements of the Habitats Regulations 2010 (as amended). The terminology of 'overwhelming need' or 'vital national interest' may be appropriate in a planning sense but the Habitats Regulations Assessment process and tests must be followed (Regs 61- 67); there are two definitions of "overriding public interest" that inform the Habitats Regulations Assessment and therefore the decision-making process (Reg 62 (1) and (2)). (Also see 10.23 below)  
While the policy had been amended by referring to 'no alternative sites' being available, we refer Carlisle CC to Regulation 62 which uses the term 'no alternative solutions'. This is a wider consideration which could require change in the design of proposed development sites.  
The policy has now added the term 'subject to mitigation', this is inappropriately used here. Mitigation may be required to remove adverse impacts on the integrity of a European Site, but if there is a residual adverse impact, as is being referred to here, Carlisle City Council will have to require 'compensation' (Reg 66).  
The advice about Nationally Designated Sites now includes the caveat, 'subject to mitigation'. Mitigation is avoidance or reduction of impacts. If there is a residual adverse impact, this would need to be compensated (NPPF 118, bullet point 1).  
The term 'scientific interest' should be replaced with 'special interest features'.  
In terms of the advice about Locally Designated Sites we would recommend that other irreplaceable habitats should also be included in this section of the policy to adequately reflect NPPF paragraph 118, bullet point 5. In Carlisle City area these include ancient woodland, lowland raised mires, lowland valley mires, and ancient meadow sites. This would also help future-proof the plan if biodiversity offsetting is brought in, as is expected.  
We consider the advice concerning Development affection Biodiversity to be unclear. For example, we are unsure of what the term, 'maintain and enhance conditions for priority habitats and species'. We would suggest a simple rewording to state "Protect and (where possible) enhance priority habitats, European and nationally protected species, and priority species." (where priority is defined as habitats and species of principal importance in England, NERC Act 2006]  
It should be noted that the Cumbria Biodiversity Action Plan is unlikely to be maintained into the future. The relevant list is the S41 list of the NERC Act 2006 - Habitats and Species of Principal Importance in England, which confers a statutory status. The NPPF continues to use the term 'priority' in its text but the NPPF glossary defines priority as the NERC Act list. We recommend that the Carlisle Local Plan updates this reference.

Suggested Changes:

The changes sought are expressed above.

It is required that considerations in the County Council's assessment of ecological implications of the sites at the SHLAA stage are reflected as part of the consideration on sites.

Response

Noted, the word solutions will be included within paragraph 10.23 and within the policy. The paragraph already refers to the relevant clause within the Habitats Regulations and it is considered sufficient for the purposes of this policy, ensuring that decisions made with regard to this matter are in line with the relevant regulations.

Wording change from mitigation to compensation for international and national designated sites is acceptable, and will be changed to bring the policy more in line with the Regulations.

Wording change to special interest features is acceptable.

Additional definition of locally important wildlife sites is appreciated and will be included within the policy.

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An updated reference to the England, NERC Act 2006 and suggested word changes are acceptable and will be included within the policy.

References to priority species within the Cumbria BAP will be replaced with reference to the NERC Act 2006.

Proposed Change  
Make suggested changes where relevant.

20758 Comment Policy: 63

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 1043, no amendment made. Stage 2 comment:  
The County Council has no advice to provide on this policy.

Response Noted.

Proposed Change  
N/A

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20142	Comment	Policy: 63		
170/45	Mr Nick Sandford	The Woodland Trust		
Detail	<p>We welcome the inclusion of woodland as a type of open space to be encouraged in new development.</p> <p>We would support the adoption of option 3 in Policy 63, namely the use of the Woodland Trust's Access to Woodland Standard. We believe that if you recognise the wide range of environmental, social and economic benefits which woodland can provide, then it is really important that people have access to woodland close to where they live.</p> <p>We have looked at the potential applicability of the standard to Carlisle and it appears that the first part of the standard may be most useful. Currently in Carlisle, 91% of people have access to a zoha wood within 4km of their home and so you are well on the way to achieving this, the second part of the standard. With respect to the first part, however, only 16% of people in Carlisle have access to a small wood of more than 2 hectares within 500 metres (ie walking distance) of their home. Even if all woodland which is currently closed to the public were opened up, our statistics show that 77 hectares of new woodland would need to be created to bring full compliance with the standard.</p> <p>If you feel that this is too ambitious a target, you could do what some other councils, such as Leeds and Calderdale have done, which is to set a percentage target which you would like to achieve over a set period. For example you might aspire to increase the 16% up to 25% or 30% and it would be possible then to derive a target for the amount of new woodland which would be needed to achieve this.</p> <p>Full details of the Access to Woodland Standard can be found in our Space for People report which is on the Woodland Trust website at <a href="http://www.woodlandtrust.org.uk/mediafile/100083906/space-for-people.pdf">http://www.woodlandtrust.org.uk/mediafile/100083906/space-for-people.pdf</a>.</p> <p>We would be happy to discuss this point further with your officers if you would find this helpful.</p> <p>We would like to see the Council adopt the first part of the Woodland Trust's Access to Woodland Standard and use it to derive woodland creation targets in the local plan.</p>			
Response	<p>Noted. Whilst the Council would be generally supportive of developers planting new woodland as part of their proposals - which is reflected in the amended Open Space policy, recognising woodland as a type of open space - the Council does not feel that the Local Plan would be an appropriate place to include targets/standards for new tree planting, and would not be capable of delivering the level of tree planting that the Woodland Trust would hope to attain. This is maybe something that is best explored through the Local Nature Partnership, to see if they plan to set any woodland planting schemes into motion to meet national woodland standards of provision.</p>			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20372	Objection	Policy: 63		
121	Mike Fox	Brampton Economic Partnership		
Detail	<p>Same as original submission 0566</p> <p>Concern regarding the loss of the last publically owned site to housing purposes, on the access to A69 towards Carlisle</p> <p>Allied to tourism, looking at the green infrastructure, any developments envisaged should have some serious consideration, on how these could be used for benefit and an impact for tourism.</p>			
Response	Noted. The protection and enhancement of green infrastructure is of high importance to the Local Plan. The value of GI for tourism, residents, businesses, and the natural environment is recognised and understood, and reflected in policy.			
Proposed Change	No change			
20759	Support	Policy: 64		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1044, amendments made. Stage 2 comment no supports the policy:</p> <p>The County Council welcomes the amendments made to this policy and has no further advice to provide with respect to this policy.</p>			
Response	Support Acknowledged			
Proposed Change	N/A			
20037	Support	Policy: 64	10.42 - 10.43	238
146/18	Mr Ian Brodie	The Ramblers		
Detail	Chapter 10: Policy 64; and Paragraphs 10.42; 10.43 The Ramblers Association fully support these as printed.			
Response	Support noted.			
Proposed Change	N/A			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20760	Support	Policy: 65		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation 1045 of support. Stage 2: support re-submitted:  This policy gives important advice to be giving weight to during the consideration of proposals which may affect trees and hedgerows. This recognition is welcome and the principle of the proposed policy appears appropriate.</p>			
Response	Support acknowledged			
Proposed Change	N/A			
20143	Comment	Policy: 65		
170/45	Mr Nick Sandford	The Woodland Trust		
Detail	<p>We would like to see adoption of Alternative Option 1 in Policy 65; ie the setting of targets for woodland creation as part of new development.</p> <p>The rationale for this is set out in our earlier comment under Policy 63 and, as we explained there, adoption of the Woodland Trust's Access to Woodland Standard would provide an objective way of determining what the woodland creation targets should be.</p> <p>An alternative would be to simply decide on a target but that might be more open to challenge in that it would not be determined as a result of an objective assessment of need.</p> <p>In our experience, it is useful to have targets for woodland creation, as small woods can be really important components of green infrastructure in new development, providing a wide range of benefits to people and wildlife, but they may sometimes be overlooked in favour of more common components of GI such as playing fields, recreation areas etc. There is clear evidence that woodland is also much cheaper to manage than intensively mown grass, which can be an important consideration for the Council and developers seeking to reduce long term maintenance commitments.</p>			
Response	<p>Noted. Whilst the Council would be generally supportive of developers planting new woodland as part of their proposals - which is reflected in the amended Open Space policy, recognising woodland as a type of open space - the Council does not feel that the Local Plan would be an appropriate place to include targets/standards for new tree planting, and would not be capable of delivering the level of tree planting that the Woodland Trust would hope to attain. This is maybe something that is best explored through the Local Nature Partnership, to see if they plan to set any woodland planting schemes into motion to meet national woodland standards of provision.</p>			
Proposed Change	No change			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20686	Comment	Policy: n/a		
097	Jessica Patten	Environment Agency		
Detail	We would also like to extend the offer made in September regarding providing further assistance on your Green Infrastructure policy. Please feel free to contact me if you would like to pursue this, and would like the assistance of the Environment Agency.			
Response	Acknowledged, the Council will look forward to continuing work with the Environment Agency on the green infrastructure policy.			
Proposed Change	N/A			
20216	Support	Policy: n/a		
077	Mr Alan Hubbard	National Trust		
Detail	The revised wording suitably addresses the concern previously raised by National Trust, the revised wording is supported.			
Response	Support noted			
Proposed Change	N/a			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent

## Stage 2 Chapter Appendix 1

20008      Comment      Policy:      n/a

184      Mrs Andrea McCallum      Clerk to Rockcliffe Parish Council

Detail      It was queried why Rock1, RO04 & RO01 appear to have been removed from Stage 2 of the consultation and it would be appreciated if this could be relayed to the Parish Council as soon as possible.

Response      Rock 1 - this site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:

"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.

Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".

RO04 - the site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.

The Environment Agency Flood Maps show site RO01 as lying within flood zone 2. The site opposite, around the telephone exchange, was considered as an alternative option during the site selection process but was discounted due to impact on the open countryside and being out of scale with the village.

The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.

Proposed Change      No change to policy in response to this comment.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20029	Comment	Policy: n/a		
203	Robert Patterson			
Detail	<p>SHLAA Ref HNo1 - Land Adjacent to The Whins, Heads Nook</p> <p>I have accessed this site via the new consultation document for the new Local Plan 2015-2030, I note that the land adjacent to the Whins, Heads Nook is still listed under SHLAA HNO1 as having "no building potential due to insurmountable access problems due to junction positions and inadequate sewerage".</p> <p>However this site is currently under an active application 13/0792 which is awaiting decision although before planning committee on 20/12/2013 for approval.</p> <p>The access problems cannot be resolved due to topographical constraints of land available to the applicant and despite considerable recent activity by United Utilities, the sewage works continue to require pumping out and tankering away after heavy rainfall.</p> <p>Surely this application should be refused without more ado?</p>			
Response	<p>Application 13/0792 - outline indicating 5 houses was approved in April 2014.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	No change to the plan in response to this comment.			
20668	Comment	Policy: n/a	289 - 315	
104	Emily Hrycan	English Heritage North West		
Detail	<p>Comments are not to be made on the alternative options for housing allocations as the supporting document clearly states that they are not being considered for development. Should any of these be put forward then we would like the opportunity to provide comments on them.</p>			
Response	Noted.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20693	Comment	Policy: n/a		BLo3
275	Cllr Allison			
Detail	BLO3 Land at Blackwell. This future potential site represents a further major urban extension, larger than the current development CARL22 of 318 dwellings at Durdar. In our submissions for the latter, residents, the Parish Council and myself as Councillor, pressed unsuccessfully for a roundabout at the bend. This additional area is designated for development from 2025. Yet there appears to be no further access points onto Durdar Road beyond that servicing CARL22.			
Response	The development of Carlisle South, post 2025, is an opportunity to deliver homes, jobs, and supporting infrastructure, including significant new highway infrastructure. Strategic Policy S3 - Broad Location for Growth - Carlisle South states that the development of this area will be in accordance with a masterplan which will be approved as a supplementary planning document. Policy S3 will be amended to clarify that infrastructure includes highways and transport, and that land required for the infrastructure to support growth will be safeguarded from development.			
Proposed Change	No change to BLo3 in Appendix 1 in response to this comment.			
20783	Comment	Policy: n/a		BRAM1
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1060. Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20656	Comment	Policy: n/a		BRAM1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is immediately adjacent to the Brampton Conservation Area. This has not been identified. The Plan also incorrectly identifies Green Lane House as Grade II* and it should be Grade II.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.</p> <p>Therefore, any development proposals for this site will need to demonstrate that that they will conserve those elements, which contribute to the significance of the listed building and its setting.</p> <p>In view of the duty of the Council to preserve or enhance the character or appearance of its conservation areas including their setting, there will be need to be some assessment of what contribution this area makes to them, including views of the conservation area. If this area does make an important contribution to setting, then the plan would need to explain why its loss and subsequent development is considered acceptable.</p> <p>Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of the conservation area and its setting.</p> <p>The document does not evaluate the impact the allocation and potential development of the site will have on the significance of the heritage assets. This needs to have been undertaken to justify the allocation of this site.</p>			
Response	<p>The listing details for Green Lane House will be amended. The site is not immediately adjacent to the Brampton Conservation Area.</p> <p>Greenlane House is fringed by mature trees and has direct road frontage. It lies opposite a row of semi detached houses with mostly continuous frontage. The proposed allocation lies to the rear of these semi detached houses. The site is visibly and physically separated from both the listed building and Brampton Conservation Area. No further detailed assessment is considered necessary at this stage.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20159	Objection	Policy: n/a		BRAM1
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	<p>As stated in our previous response to this allocation, Friends of the Lake District has concerns about the southward extent of this site well outside of the existing settlement pattern and into open countryside.</p> <p>Please see our previous comments below:</p> <p>Friends of the Lake District does not object to the principle of allocation on this site, but does object to the large southward extent of the allocation boundary. This is because it will extend the town outside of the current boundaries of the settlement as defined by Greenhill and Carlisle Road.</p> <p>A less extensive allocation at this site which is well related to the existing housing on Greenhill and the business/industrial development on Carlisle Road would fit better into the landscape</p>			
Response	<p>Suggest - Alter proposed allocation boundary as described above.</p> <p>The majority of new allocations are outside the current boundaries of settlements. Previous settlement boundaries were so tightly drawn that they left very little scope for development within them. Cramming development within existing settlements limits can harm the character and qualities of the settlement. The site is considered to have the potential to integrate well with the form and layout of Brampton in this location.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20784	Comment	Policy: n/a		BRAM2
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1061. Stage 2 County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20785	Comment	Policy: n/a		BRAM <sub>3</sub>
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1062. Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20786	Comment	Policy: n/a		BRAM <sub>4</sub>
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1063. Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20657	Comment	Policy: n/a		BRAM4
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is adjacent to a Grade II listed building. However, the Plan does not appear to identify that it is also within the WHS buffer zone. The NPPF considers the WHS to be of the highest significance and therefore any harm to its significance and OUV should be wholly exceptional. The document makes no attempt to determine the impact the allocation and potential development of the site will have on its significance without having undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site. It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p> <p>The site is also adjacent to a Grade II listed asset. This has not been identified.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.</p> <p>Therefore, any development proposals for this site will need to demonstrate that that they will conserve those elements, which contribute to the significance of the listed buildings and their setting.</p>			
Response	<p>The Grade II listed Garth House, which lies adjacent to the site, is heavily screened by mature trees. Planning permission has recently been granted for the development of five houses within the grounds of Garth House.</p> <p>The proposed allocation lies within the visual impact zone of Hadrian's Wall WHS. The visual impact of any development on the significance of the WHS will be properly considered as part of any planning application. Whilst there is potential for unknown archaeological remains to survive, there are no designated heritage assets within the site. Any future planning application would need to be accompanied by an appropriate level of archaeological assessment.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20160	Objection	Policy: n/a	BRAM4	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	<p>Friends of the Lake District continues to maintain an objection to the northwestern extent of the BRAM4 allocation site. See below for original response:  Friends of the Lake District does not object to the principle of allocation on part of this site, but does object to the large north-western extent of the allocation. This is because it will extend the town into open countryside of high landscape value, well outside of the current boundaries of the settlement as defined along the A6071 and Howard/Dacre Road.  FLD suggests that the site is reduced in size so that it relates better to the existing settlement in the north of Brampton (e.g. as shown on the map to the right).  There are a number of mature trees and hedgerows on this site. These should be noted in the site profile and should be retained in any development.  Should the allocation extend across the whole of the site, areas of open space should be identified for green infrastructure/recreation/biodiversity purposes</p>			
Response	<p>Suggest - Alter proposed allocation boundary as described above.</p> <p>The majority of new allocations are outside the current boundaries of settlements. Previous settlement boundaries were so tightly drawn that they left very little scope for development within them. Cramming development within existing settlements limits can harm the character and qualities of the settlement. The site is considered to have the potential to integrate well with the form and layout of Brampton in this location. The Plan notes that the small beck which lies on the northern boundary of the site is classified as 'Main River' and as such there is an 8 m exclusion zone within which no development can take place. This will provide an opportunity to create a landscape buffer and potentially some open space between the site and the property to the north, Oakwood Park Hotel. Care will need to be taken to protect the route of the public footpath to ensure that it continues to provide a safe and attractive route for pedestrians.  The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20135	Objection	Policy: n/a	BURG1	
219	Mr Peter Cottram			
Detail	<p>1. the pre-consultation comments on scope for new development included in the Rural Masterplanning final draft for Burgh by Sands states 'if development of backland is to be considered for the future (particularly north of the current settlement boundary) it will be important that access is ensured from the main street as the road north from the settlement centre is narrow, with little opportunity for widening and unlikely to be acceptable from a Highways point of view for increase in traffic from development. Also, recent development has blocked one way in from the lower part of this road. This document also includes tow photographs of the road in North End, commenting on the 'narrow road' and that 'access' will be challenging.</p> <p>Why has this apparently been disregarded in favour of a site, about which, no time was allowed proper consideration.</p> <p>2. Why is a site (Highfield) being considered at all, as it is situated in an area of AONB and when a perfectly suitable brownfield site exists in the village?</p> <p>3. Why have the 2 areas mentioned in the final draft for Burgh by Sands 'a south of Amberfield' and 'B West along the road out of the village towards Longburgh' been apparently sidelined in favour of a site seemingly thought unsuitable in the final draft?</p> <p>In view of the fact that possible development of Highfield was learnt about at a very late stage and without sufficient attention being given to its existence, it is strongly recommended that proper consideration and further consultation should take place before this matter is allowed to proceed further.</p> <p>Information regarding the conflict of information regarding this site and the reasons for refusal of an application in the vicinity for a small 2 bedroomed cottage.</p> <p>Would like:</p> <ol style="list-style-type: none"> <li>1. Serious consideration given to an existing brownfield site in the village.</li> <li>2. further consideration given to the 2 areas on the Rural Masterplanning document.</li> <li>3. that enquiries be made concerning comments that a site exists to the west of the village which the owner has apparently stated could be available for development. Although the site lies just outside the Parish boundary, it is believed that recent changes in planning guidance allow this to be addressed if necessary.</li> </ol>			
Response	<p>The Local Plan can only allocate land for development which is genuinely made available by the landowner. At the time this draft version of the Plan was drawn up, only one site had been submitted to the Council for consideration to be allocated for housing. Two further sites have now been submitted in response to the Local Plan consultation and will be assessed. No site to the west of the village has been submitted to the Council for consideration.</p> <p>The Highways Authority has indicated that there are no significant highways related issues with the site at Highfield.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20787	Comment	Policy: n/a	BURG1	
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20698	Comment	Policy: n/a	BURG1	
276	Dr Brian Irving	Solway Coast AONB		
Detail	It looks Ok if the housing is designed properly in the vernacular style. However, this is a plot for developers to look at and is not a planning proposal. I would say that if a housing need exists for Burgh by Sands then why can't a development be made available around Amberfield which lays outside the AONB, Conservation Area and WHS. It also gains from being close to the school.			
Response	The Local Plan can only allocate land for development which is genuinely made available by the landowner. At the time this draft version of the Plan was drawn up, only one site had been submitted to the Council for consideration to be allocated for housing. Two further sites have now been submitted in response to the Local Plan consultation and will be assessed. One of these sites is adjacent to Amberfield. Policy S3 - Design seeks to ensure that all development proposals will be assessed against a number of design principles, in particular that development should respond to the local context and the form of surrounding buildings in relation to height, scale, massing and established street patterns, and by making use of appropriate materials and detailing. The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20658	Comment	Policy: n/a	BURG1	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is within the WHS buffer zone.</p> <p>The NPPF considers the WHS to be of the highest significance and therefore any harm to to its significance and OUV should be wholly exceptional.</p> <p>The document makes no attempt to determine the impact the allocation and potential development of the site will have on its significance and has not undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p> <p>It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p>			
Response	<p>There is no designated heritage asset within the site.</p> <p>As the NPPF makes clear, the significance of the designated heritage asset derives not only from its physical presence, but also from its setting. The Local Plan policies map identifies the buffer zone to the WHS. In this location the remains of the WHS are not tangible. National Planning Policy Guidance (NPPG) suggests that applicants proposing change that might affect the Outstanding Universal Value, integrity and, where applicable, authenticity of a World Heritage Site through development within the Site or affecting its setting or buffer zone (or equivalent) need to submit sufficient information with their applications to enable assessment of impact on Outstanding Universal Value. This may include visual impact assessments, archeological data or historical information. In many cases this will form part of an Environment Statement. It is not considered that this level of assessment is necessary at this stage of the Local Plan.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20184	Objection	Policy: n/a		CA6o
225	JR & JA Workman			Aoo8
Detail	<p>Explicit recognition of the inclusion of the land off Beverley Rise, Harraby (CA6o) as an alternative option housing allocation (page 292).  Object – the alternative housing allocation CA6o is land that is controlled by the owners of allocation CARL4 and it is deliverable within a 5-year period. As such, and given that the council agrees that it shares the same characteristics as allocation CARL4 (lies in a neighbourhood with a local primary school, bus stops, community centre, open space and a neighbourhood shopping area), its development accords with the central thrust of the NPPF and there are no barriers to short term deliverability therefore the site should be allocated now. In terms of its relationship to the M6, this has been addressed in the submitted master plan in support of policy S3 such that a continuous planting buffer is proposed to the eastern site boundary to satisfactorily address any concerns over the site's visual and acoustic relationship.</p> <p>Suggest: Inclusion of site CA6o as a deliverable extension to housing allocation CARL4.</p>			
Response	<p>Whilst in location terms the site lies in a neighbourhood with a local primary school, bus stops, community centre, open space and a neighbourhood shopping area, visually the site provides an important buffer between the edge of the housing area, including proposed allocation Carl 4, and the M6. There are a number of other preferable sites in the area which don't have the same noise constraints as this site. Therefore the role this land plays as both a physical, visual and noise barrier between existing housing and the M6 is of more significance than the need to allocate more land for housing in this location.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20003	Comment	Policy: n/a	292	CA6o
197	Mr John Kidd			
Detail	<p>Telephone message regarding the designation at Beverly Rise. Main issues are:</p> <ul style="list-style-type: none"> <li>- costs requires to put in measures to deal with noise from the M6</li> <li>- Railway land in the vicinity</li> <li>- should be looking at existing vacant properties within the City before building new homes i.e. Lowther Street and Railway Tavern.</li> </ul>			
Response	Site CA6o is an alternative option for a housing allocation. The site has not been allocated for housing development. It has been included in the Local Plan consultation to show other sites that were considered as part of the process leading to the selection of sites. Alternative options are not proposals for development. They will not be included in the Local Plan once the finalised version is published and subsequently adopted.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20070	Comment	Policy: n/a		CA73
043	Nigel Winter	Stagecoach		
Detail	The development sites at Upperby are quite rightly being looked at collectively. This is a difficult area to serve by bus at present due to narrow roads, awkward junctions and on street parking. Adding major developments has the potential to make matters worse. The development sites will require good access roads and connections to the existing road networks. There is the potential to have a high quality frequent bus service given the right access and road design.			
Response	<p>The site lies in the broad location of Carlisle South, which is identified in Policy S3 of the Local Plan as an area for a major mixed use urban extension from 2025 onwards. The policy states that the development of this area will be in accordance with a masterplan which will be approved as a supplementary planning document. It is therefore important that sites in this area do not come forward in isolation, as this would prejudice the opportunity to comprehensively shape the physical form and social fabric of the area to create a sustainable place in an area based rather than a piecemeal approach.</p> <p>A Transport Assessment will be required with any proposal to develop this site. The National Planning Policy Framework states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and submitted with a planning application for the development. It will then be used to determine whether the transport impact of the development is acceptable.</p> <p>The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.</p>			
Proposed Change	No change to policy in reponse to this comment.			
20649	Comment	Policy: n/a		CARL1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is opposite a Grade II listed asset. This has not been identified.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.</p> <p>Therefore, any development proposals for this site will need to demonstrate that that they will conserve those elements, which contribute to the significance of the listed buildings and their setting.</p>			
Response	<p>The Grade II listed Milestone will be referenced in the 'Site Selection Process' document which is one of the background documents to the Local Plan.</p> <p>Policy 57 - Listed Buildings provides adequate protection to the listed heritage assets within the District.</p> <p>It is extremely unlikely that the development of Carl 1 for housing would lead to substantial harm or loss of this milestone.</p>			
Proposed Change	No change to Plan in response to this comment.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20761	Comment	Policy: n/a		CARL1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1046. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20770	Comment	Policy: n/a		CARL10
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1055. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20064	Comment	Policy: n/a		CARL10
043	Nigel Winter	Stagecoach		
Detail	<p>The site is too far from the main Scotland Rd for bus customers to walk. Consideration should be given to either a statement to the effect that homeowners at this site will not receive passenger transport services, or alternatively a means to access this development by sustainable PT will be a condition of planning consent. The current supported service 69 may have been diverted to serve this development, however it may be withdrawn by the time this development is complete as a casualty of County Council bus funding cuts.</p>			
Response	<p>The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.</p> <p>The Highways Authority has commented as follows on this particular site:</p> <p>We have concerns over traffic generation. Development of this scale would require a link road from Newfield Park/Windsor. Way/Lansdowne Close and bus service provision. (The site should be able to provide for a regular bus service, making it possible for each dwelling to be within 400m of a bus stop.) Capacity issues likely with M6 Jct 44. Junction capacity issues onto Scotland Road as well as major junctions to the north of Carlisle as stated in Modelling report. It should be noted that Tarraby Lane is not of a sufficient standard to serve significant development and that no vehicular access, with the possible exception of emergency or cycle, should be allowed. May result in capacity issues with M6 Jct 44. Public Right of Way FP 132011 runs adjacent to the site and will need to be taken into account in subsequent development proposals.</p> <p>Any planning application will need to demonstrate that the site can provide a regular bus service.</p>			
Proposed Change	No change to the Plan in response to this comment.			
20652	Comment	Policy: n/a		CARL10 & 11
104	Emily Hrycan	English Heritage North West		
Detail	<p>The document makes an assumption on the impact the allocation and potential development of the site will have on archaeology without having undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p>			
Response	<p>There are no designated heritage assets within these sites. Whilst it is acknowledged that there is the potential for unknown archaeological remains to survive, the appropriate time for this to be assessed is at the planning application stage.</p> <p>The NPPG states that decision-taking regarding such assets requires a proportionate response by local planning authorities. Where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaeological interest only a small proportion – around 3 per cent – of all planning applications justify a requirement for detailed assessment.</p>			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20065	Comment	Policy: n/a		CARL11
043	Nigel Winter	Stagecoach		
Detail	The site is too far from the main Scotland Rd for bus customers to walk. Consideration should be given to either a statement to the effect that homeowners at this site will not receive passenger transport services, or alternatively a means to access this development by sustainable PT will be a condition of planning consent. The current supported service 69 may have been diverted to serve this development, however it may be withdrawn by the time this development is complete as a casualty of County Council bus funding cuts.			
Response	<p>The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.</p> <p>The Highways Authority has commented as follows on this particular site:</p> <p>We have concerns over traffic generation. Development of this scale would require a link road from Newfield Park/Windsor Way/Lansdowne Close and bus service provision. (The site should be able to provide for a regular bus service, making it possible for each dwelling to be within 400m of a bus stop.) Capacity issues likely with M6 Jct 44. Junction capacity issues onto Scotland Road as well as major junctions to the north of Carlisle as stated in Modelling report. It should be noted that Tarraby Lane is not of a sufficient standard to serve significant development and that no vehicular access, with the possible exception of emergency or cycle, should be allowed. May result in capacity issues with M6 Jct 44. Public Right of Way FP 132011 runs adjacent to the site and will need to be taken into account in subsequent development proposals.</p> <p>Any planning application will need to demonstrate that the site can provide a regular bus service.</p>			
Proposed Change	No change to the Local Plan in response to this comment.			
20771	Comment	Policy: n/a		CARL11
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20772	Comment	Policy: n/a		CARL12
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20653	Comment	Policy: n/a		CARL13
104	Emily Hrycan	English Heritage North West		
Detail	The site is immediately adjacent to the WHS Buffer Zone. This has not been identified in the Plan. The NPPF considers the WHS to be of the highest significance and therefore any harm to its significance and OUV should be wholly exceptional. The document makes an assumption on the impact the allocation and potential development of the site will have on its significance without having undertaken an assessment. Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site. It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.			
Response	In line with the NPPF the Local Plan aims to conserve the Outstanding Universal Value, integrity and authenticity (where relevant for cultural or 'mixed' sites) of Hadrian's Wall World Heritage Site and its setting, including any buffer zone or equivalent. Carl 13 lies outside the buffer zone. With regard to the comment on unidentified archaeology, decision-taking regarding such assets requires a proportionate response by local planning authorities. Where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaeological interest only a small proportion – around 3 per cent – of all planning applications justify a requirement for detailed assessment.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20773	Comment	Policy: n/a		CARL13
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20774	Comment	Policy: n/a		CARL14
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20066	Comment	Policy: n/a		CARL14
043	Nigel Winter	Stagecoach		
Detail	There is an opportunity to put in place a bus link road to connect the various development sites at Harraby and Carleton Clinic. Some of the development sites are a long walk from the nearest current bus stops detracting from using passenger transport services.			
Response	The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals. In response to this particular site the Highways Authority has commented that the development is acceptable in principle, but that local widening of an access road will be needed.			
Proposed Change	No change to Local Plan in response to this comment.			
20654	Comment	Policy: n/a		CARL14
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is immediately adjacent to the Settle to Carlisle Railway Conservation Area.</p> <p>The document makes an assumption on the impact the allocation and potential development of the site will have on its significance without having undertaken an assessment.</p> <p>Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of the conservation area and its setting.</p> <p>In view of the duty of the Council to preserve or enhance the character or appearance of its conservation areas including their setting, there will be need to be some assessment of what contribution this area makes to them, including views of the conservation area. If this area does make an important contribution to setting, then the plan would need to explain why its loss and subsequent development is considered acceptable.</p> <p>This does not appear to have been undertaken to inform the Plan.</p>			
Response	Decision-taking regarding such assets requires a proportionate response by local planning authorities. The NPPG advises that heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals. There is a wide range and mix of uses adjacent to the Carlisle/Settle Conservation Area, including housing. It is not considered necessary to undertake a detailed assessment of the impact any potential development might have on the CA at this stage.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20067	Comment	Policy: n/a		CARL15
043	Nigel Winter	Stagecoach		
Detail	Routing the bus service via Tyne Street through to Hill Top Heights will serve the new homes to be built and the NHS clinic at the top of the hill. Suitable access will be required for buses.			
Response	<p>The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.</p> <p>The Highways Authority has severe reservations about the ability of this site to provide suitable access.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20655	Comment	Policy: n/a		CARL15
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is immediately adjacent to the Settle to Carlisle Railway Conservation Area.</p> <p>The document makes an assumption on the impact the allocation and potential development of the site will have on its significance without having undertaken an assessment.</p> <p>Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of the conservation area and its setting.</p> <p>In view of the duty of the Council to preserve or enhance the character or appearance of its conservation areas including their setting, there will be need to be some assessment of what contribution this area makes to them, including views of the conservation area. If this area does make an important contribution to setting, then the plan would need to explain why its loss and subsequent development is considered acceptable.</p> <p>This does not appear to have been undertaken to inform the Plan.</p>			
Response	<p>Any planning application will be required to include an assessment of the impact of the development on the setting of the conservation area, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.</p> <p>It is not considered necessary to undertake this level of assessment at this stage, as the allocation establishes the principle of development on the site, and not the detail of that development. The Local Plan contains other policies which seek to protect heritage assets.</p>			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20775	Comment	Policy: n/a		CARL15
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20776	Comment	Policy: n/a		CARL16
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20777	Comment	Policy: n/a		CARL17
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1059. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20068	Comment	Policy: n/a		CARL18
043	Nigel Winter	Stagecoach		
Detail	<p>Routing the bus service via Tyne Street through to Hill Top Heights will serve the new homes to be built and the NHS clinic at the top of the hill. Suitable access will be required for buses.</p>			
Response	<p>Comment noted.  The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.  The Highways Authority has commented that access onto London Road may be problematic. They have severe reservations about the ability of the site to provide suitable access due to potential capacity issues, unless the junction is improved.</p>			
Proposed Change				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20778	Comment	Policy: n/a		CARL18
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20779	Comment	Policy: n/a		CARL19
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1058. Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20650	Comment	Policy: n/a		CARL2
104	Emily Hrycan	English Heritage North West		
Detail	<p>The Plan indicates that there is a Roman Road along the western boundary of the site. Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p>			
Response	<p>The NPPG states that decision-taking regarding such assets requires a proportionate response by local planning authorities. Where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaeological interest only a small proportion of all planning applications nationally justify a requirement for detailed assessment.</p>			
Proposed Change	<p>No change to the Local Plan following this comment.</p>			
20762	Comment	Policy: n/a		CARL2
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20780	Comment	Policy: n/a		CARL20
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1056. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20781	Comment	Policy: n/a		CARL21
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20069	Comment	Policy: n/a		CARL22
043	Nigel Winter	Stagecoach		
Detail	The development sites at Upperby are quite rightly being looked at collectively. This is a difficult area to serve by bus at present due to narrow roads, awkward junctions and on street parking. Adding major developments has the potential to make matters worse. The development sites will require good access roads and connections to the existing road networks. There is the potential to have a high quality frequent bus service given the right access and road design.			
Response	The site has planning permission and is currently under construction. At the time of the application the Highway Authority commented that the majority of the estate will have access to the existing suburban bus services that operate along the C1036 (Durdar) and C1037(Scalegate) roads. The connectivity now being provided through the estate allows for future 'through bus routing' once the entire estate is complete, should this prove attractive to commercial operators. The comment that there is potential to have a high quality frequent bus service given the right access and road design is welcomed.			
Proposed Change	No change to the Local Plan in response to this comment.			
20782	Comment	Policy: n/a		CARL22
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20763	Comment	Policy: n/a		CARL3
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1047. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20063	Comment	Policy: n/a		CARL4
043	Nigel Winter	Stagecoach		
Detail	<p>There is an opportunity to put in place a bus link road to connect the various development sites at Harraby and Carleton Clinic. Some of the development sites are a long walk from the nearest current bus stops detracting from using passenger transport services.</p>			
Response	<p>It is recognised that an extension to suburban bus services will be required to serve future development of this site.  A Transport Assessment will be required with any proposal to develop this site. The National Planning Policy Framework states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and submitted with a planning application for the development. It will then be used to determine whether the transport impact of the development is acceptable. In addition a Travel Plan will be required to include modal shift measures.</p>			
Proposed Change				
20183	Support	Policy: n/a		CARL4
225	JR & JA Workman			A008
Detail	<p>Explicit support for the inclusion of the land north of Moorside Drive/Valley Drive (CARL4) as a housing allocation (page 265).</p>			
Response	<p>Support noted.</p>			
Proposed Change				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20764	Comment	Policy: n/a		CARL4
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1049. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20765	Comment	Policy: n/a		CARL5
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1050. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20694	Comment	Policy: n/a		CARL5/16/17
275	Cllr Allison			
Detail	CARL5, CARL16 and CARL17 represent major developments at Carleton. Chris Hardman will recall that we organised a presentation at the Rugby Club. The outcome was that a pre-condition of any development at Carleton Clinic was that there should be improved access to the A6 with widening of either the C1040 or 1164 (Blue Rare) lane. This would be covered had we a policy on infrastructure.			
Response	The Highways Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals. The Highways Authority has indicated that the scale of development in this area would require upgrading of Sewells Lonning to Local Access Road Standard and a suburban bus service extension to serve the area. The Carlisle Local Plan Transport Study referred to above will model the impacts of this and other nearby developments on junction capacities of nearby junctions. The results of this modelling will inform any mitigation measures required.			
Proposed Change	No change to Local Plan in response to this comment.			
20766	Comment	Policy: n/a		CARL6
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1051. Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20767	Comment	Policy: n/a		CARL7
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1052. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20768	Comment	Policy: n/a		CARL8
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1055. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20651	Comment	Policy: n/a		CARL8
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is immediately adjacent to the WHS Buffer Zone. This has not been identified in the Plan.</p> <p>The NPPF considers the WHS to be of the highest significance and therefore any harm to its significance and OUV should be wholly exceptional. The document makes an assumption on the impact the allocation and potential development of the site will have on its significance without having undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p> <p>It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p>			
Response	<p>In line with the NPPF the Local Plan aims to conserve the Outstanding Universal Value, integrity and authenticity (where relevant for cultural or 'mixed' sites) of Hadrian's Wall World Heritage Site and its setting, including any buffer zone or equivalent. This site lies outside the WHS buffer zone.</p> <p>There are no designated heritage assets within the site. Decision-taking regarding such assets requires a proportionate response by local planning authorities. Where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaeological interest only a small proportion – around 3 per cent – of all planning applications justify a requirement for detailed assessment.</p>			
Proposed Change	No change to the Local Plan in response to this comment.			
20769	Comment	Policy: n/a		CARL9
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20691	Support	Policy: n/a	CUD03	
275	Cllr Allison			
Detail	CUD03 is within the village boundary and I believe would be acceptable to most (but not all) if it included widening of the narrow stretch referred to in the LP document.			
Response	The site lies on the southern edge of Cummersdale and there are attractive views from the edge of the village to the countryside to the south and east. The northern boundary of the site is formed by a mature tree belt, and there are a further four mature trees in the hedgerow along the western boundary. This reduces the developable area of the site, as mature trees require at least a five metre exclusion zone between the crown edge and any development. Caldew Road narrows at this point and there is no footway. It is considered that the landscape impact of developing this site would be greater than that of developing the preferred allocation in Cummersdale, at the northern end of the village. Cummersdale is a small village of approximately 110 properties. The preferred allocation makes provision for an indicative 14 houses, which represents an approximate 10% increase in properties in the village. It is considered that further allocations could lead to unacceptable increase in the scale of new housing development in the village.			
Proposed Change	No change.			
20692	Support	Policy: n/a	CUD04	
275	Cllr Allison			
Detail	The comments on CUD04 have been well received, ie. that the present open aspect with hedge and public open space defines the village edge. I support the PC in that the open area defined by the bridleways, one of which leads to Dalston Road, should define the buffer zone to protect the village from urban creep. Residents would like to have clarity on the implications of relocation of the "Welcome to Carlisle 30mph" sign to Peter Lane, and reassurance that it will not be regarded as an extension of urban Carlisle. Their concerns would be assuaged if it was simply the speed limit sign that was moved to Peter Lane.			
Response	Comments on CUD04 noted. Speed limit signs are used to indicate where a change in speed limit applies, and are not indicators of the extent of the built up area, or any other type of environment.			
Proposed Change	No change proposed.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20788	Comment	Policy: n/a		CUMM1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1065. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20690	Support	Policy: n/a		CUMM1
275	Cllr Allison			
Detail	<p>CUMM1 This designation of CUMM rather than CARL is welcome and the site reflects the consensus of the three options that emerged from your consultation. It is supported by the community.</p>			
Response	<p>Support noted.</p>			
Proposed Change				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20659	Comment	Policy: n/a		CUMM1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The Plan correctly identifies a Grade II listed building close by.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.</p> <p>Therefore, any development proposals for this site will need to demonstrate that that they will conserve those elements, which contribute to the significance of the listed building and its setting.</p> <p>The document does not evaluate the impact the allocation and potential development of the site will have on the significance of the heritage assets. An assessment needs to have been undertaken to justify the allocation of this site.</p>			
Response	<p>The Spinners Arms is a Grade II listed building which is separated from the eastern boundary of the site by four houses.</p> <p>The development of the site is unlikely to have an impact on this building, as the site is physically and visibly separated from the listed building.</p> <p>Any planning application will be required to include an assessment of the impact of the development on the setting of the heritage asset, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.</p>			
Proposed Change	No change to the Local Plan in response to this objection.			
20789	Comment	Policy: n/a		CUMW1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1066. Stage 2 County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20790	Comment	Policy: n/a		CUMW2
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20129	Support	Policy: n/a		CUMW2
218	Executors of Mrs M Coulson		A013	
Detail	As set out in other representations, we fully support the Council's conclusion that Site CUMW 2 is 'considered to be a sustainable location for development.' Smaller rural villages play an integral part in servicing the local community and it is vital the provision is made for their growth over the forthcoming plan period to ensure their continued contribution to their local communities. Initial constraints identified include the location of a mature tree in the north western corner of the site however any future development would take into consideration its root protection zone. In addition, St John's War Memorial is located to the south west of the site. Therefore, as acknowledged by our client and the Council, any future development would respect its location through suitable design and spacing. We fully support the identification of site CUMW 2 for the residential development of up to 20 units. In line with the NPPF, it is important that the Council recognise the important role rural settlements have to play in supporting rural communities. Cumwhinton is considered a wholly suitable location for new development given its range of existing services and close proximity to Carlisle and the M6 motorway. It is, however, important that development is not subject to onerous policy constraints and we therefore question the requirement of all schemes of 5 units or more to provide 30% affordable housing. It is vital that new schemes remain viable and we therefore suggest greater flexibility is incorporated into the affordable housing policy. Our client is keen to work closely with the Council in delivering this site and if any further information is required please do not hesitate to contact us.			
Response	Support noted. The affordable housing policy already includes some flexibility where there are viability issues on site. The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20791	Comment	Policy: n/a		CUMW3
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20130	Comment	Policy: n/a		CUW06
218	Executors of Mrs M Coulson		A013	
Detail	Whilst we fully support the identification of site CUMW 2 for housing, CUMW 06 (land north of B6263) - north of site CUMW 2 - is also solely within our client's ownership. Whilst the Council did consider the site for possible for development, its scale is considered too large in relation to the scale of the village. However it is considered that the site would be a natural extension to CUW 2 and our client would be willing to work with the Council to bring the site forward for development should there be an identified need for new housing during the later stages of the plan period.			
Response	The Local Plan allocates sufficient land to meet housing needs across the district. There is currently no need to allocate additional sites. Other preferable sites exist in Cumwhinton. The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20584	Comment	Policy: n/a	299	CUWo6
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – Too large scale. Concerns regarding the limitation to expand the primary school, this should be considered when permitting large scale development.			
Response	Site CUWo6 is an alternative option for a housing allocation. The site has not been allocated for housing development. It has been included in the Local Plan consultation to show other sites that were considered as part of the process leading to the selection of sites. Alternative options are not proposals for development. They will not be included in the Local Plan once the finalised version is published and subsequently adopted.			
Proposed Change	No change to the Local Plan in response to this comment.			
20696	Comment	Policy: n/a		DA01/OC07/OC51
275	Cllr Allison			
Detail	OCO7, DAO1 and OC51 have not been allocated since the above allocation is deemed sufficient for 15 years. DAO1 appears to be a very substantial size, estimated at around 70-80 units. Collectively these three proposals amount to broadly the same total as DAL51 which itself is the biggest single development undertaken at Dalston.			
Response	Comment noted.			
Proposed Change	No change to the Plan in response to this comment.			
20695	Comment	Policy: n/a		DALS1
275	Cllr Allison			
Detail	DAL51 would have caused less controversy had the CIL been in place. Residents were particularly concerned at the low provision of single storey terrace or bungalows suitable for elderly with only 4 units (or 3%) when 26% of the local population are over 65yrs. Reason given “the footprint is too large”. Likewise the barn which could have been converted to a Service hub/library was demolished to maximise the number of houses.			
	Given that DAL51 is expected to be completed within 6 years, does that imply that there will be no further permissions for the following 9 years?			
Response	The site was granted planning permission under application 12/0878. The groundworks started in Spring 2014. The site remains as an allocation in the Local Plan and will contribute towards the first five years of housing supply. Policy 17 makes provision for windfall housing on sites other than those allocated in Policy 16. Historic windfall rates of housebuilding are at over 100/year. Additional housing in Dalston could therefore be provided under this Policy. In addition, Dalston is preparing a neighbourhood plan which has the potential to identify sites suitable for future housing development. Therefore new housing sites could be delivered through the Dalston Neighbourhood Plan.			
Proposed Change	No change proposed to the Local Plan in response to this comment.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20792	Comment	Policy: n/a		DALS1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1067. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20071	Comment	Policy: n/a		HARK1
043	Nigel Winter	Stagecoach		
Detail	<p>This is a difficult site to serve with a bus service. Unlikely to be sustainable on 300 dwellings. The area suggests lower value dwellings, more likely to be bus users. Certainly the second generation of residents are more likely to be bus users. A larger site with more dwellings will aid a sustainable bus service.</p>			
Response	<p>There is a frequent and regular bus service along the A7 between Longtown and Carlisle. The road junction of the Low Harker Road with the A8 is approx 600m from the site. The positioning of a bus stop in the vicinity would address the issue raised in this comment.</p>			
Proposed Change	<p>No change to the Local Plan in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20793	Comment	Policy: n/a		HARK1
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20006	Objection	Policy: n/a	282	HARK1
184	Mrs Andrea McCallum	Clerk to Rockcliffe Parish Council		
Detail	<ul style="list-style-type: none"> <li>- This land is considered suitable for employment use by Parish Cllrs, contrary to comments included in the summary that an 'oversupply of employment land' in Carlisle exists. This comment is considered flawed, Cllrs advising that the over-control of available employment land by Carlisle City Council and a small number of suitable landowners is considered a problem;</li> <li>- a lack of availability of school places exists;</li> <li>- lack of infrastructure exists in the area, i.e. No bus service.</li> </ul>			
Response	<p>the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The Employment Land Review shows that there is currently an oversupply of employment land in Carlisle. The buildings on the site are outdated and pose maintenance problems for modern employment uses.</p> <p>The site would require a cycle path along C1015/1022. The site has poor accessibility and would potentially require a developer contribution to improve bus service frequency. Any development would require a Transport Assessment and Travel Plan.</p> <p>The City Council is working closely with the Education Authority to address the current primary school capacity issues that exist within Carlisle.</p> <p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20072	Comment	Policy: n/a		HO01
043	Nigel Winter	Stagecoach		
Detail	Difficult to connect to passenger transport services.			
Response	This site is an alternative option for the preferred housing allocations, and has not been allocated for housing development. Such sites have been included in the Local Plan to show other sites that were considered as part of the process leading to the selection of sites.			
Proposed Change	No change to the Local Plan in response to this comment.			
20073	Comment	Policy: n/a		HO02
043	Nigel Winter	Stagecoach		
Detail	Difficult to connect to passenger transport services.			
Response	This site is an alternative option for the preferred housing allocations, and has not been allocated for housing development. Such sites have been included in the Local Plan to show other sites that were considered as part of the process leading to the selection of sites.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20660	Comment	Policy: n/a		HOUG1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is within the WHS buffer zone.</p> <p>The NPPF considers the WHS to be of the highest significance and therefore any harm to its significance and OUV should be wholly exceptional.</p> <p>The document makes no attempt to determine the impact the allocation and potential development of the site will have on its significance and has not undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p> <p>It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p>			
Response	<p>Planning application 12/0610 was granted outline permission in early 2014. Comments from English Heritage, and the County Council's heritage officer were as follows: English Heritage has indicated that the application site appears to lie too far north of the Roman frontier to be likely to have an impact on it. However, and in the absence of specific details on service and drainage provision, there could be a need to bring these into the site from the south, and therefore across the line of the Roman frontier. In response, the applicant's agent has confirmed that the intention is for the site to be developed by utilising the existing infrastructure and therefore should not have any material impact upon the World Heritage Site.</p> <p>The County Archaeologist/Historic Environment Officer has explained that the military camp itself is of some interest however, particularly in reference to the social history of Carlisle, and although much of it has been cleared, its overall layout and the foundations of some of the buildings do survive. It is therefore recommended that the remains of the 20th century military camp are photographed and recorded prior to their demolition as part of the proposed development. This programme of work should be commissioned and undertaken at the expense of the developer and advise that it can be secured through the inclusion of a condition.</p>			
Proposed Change	No change to the Local Plan in response to this comment.			
20794	Comment	Policy: n/a		HOUG1
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20662	Comment	Policy: n/a	LINS1	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is within the WHS buffer zone. The document does not identify this.</p> <p>The NPPF considers the WHS to be of the highest significance and therefore any harm to its significance and OUV should be wholly exceptional.</p> <p>The document makes no attempt to determine the impact the allocation and potential development of the site will have on its significance and has not undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p> <p>The site is also adjacent to a Grade II* listed building, Linstock Castle.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II* listed building should be wholly exceptional.</p> <p>English Heritage has concerns about the potential allocation of the site for development and would like a heritage impact assessment to be undertaken before it can support the proposal.</p> <p>It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p>			
Response	<p>The Site Selection document which forms a background paper to the Local Plan will be updated to reflect the site's location within the buffer zone of the World Heritage Site. In line with the NPPF the Local Plan aims to conserve the Outstanding Universal Value, integrity and authenticity (where relevant for cultural or 'mixed' sites) of Hadrian's Wall World Heritage Site and its setting, including any buffer zone or equivalent.</p> <p>There are no designated heritage assets within the site. Decision-taking regarding potential assets requires a proportionate response by LPAs. Where an initial assessment indicates that the site on which development is proposed has potential to include heritage assets with archaeological interest, applicants will be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaeological interest only a small proportion of all planning applications justify a requirement for detailed assessment.</p> <p>Any planning application will be required to include an assessment of the impact of the development on the setting of the Grade II* listed building at Linstock Castle, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.</p>			
Proposed Change	<p>No change to the Local Plan in response to this comment. The Site Selection document will be amended to reflect the site's location within the buffer zone of the World Heritage Site, and a brief assessment of the potential impacts on the Grade II* listed Linstock Castle.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20795	Comment	Policy: n/a		LINS1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1068. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20796	Comment	Policy: n/a		LONG1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1064. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20797	Comment	Policy: n/a		MOOR1
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20661	Comment	Policy: n/a		MOOR1
104	Emily Hrycan	English Heritage North West		
Detail	The Plan also correctly identifies a Grade II listed building opposite the site. The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional. Therefore, any development proposals for this site will need to demonstrate that they will conserve those elements, which contribute to the significance of the listed building and its setting. The document does not evaluate the impact the allocation and potential development of the site will have on the significance of the heritage assets. An assessment needs to have been undertaken to justify the allocation of this site.			
Response	Any planning application will be required to include an assessment of the impact of the development on the setting of the listed building opposite the site, (Farifield), and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.			
Proposed Change	No change to the Local Plan in response to this comment. The Site Selection document will be amended to include a brief assessment of the potential impacts on the Grade II* listed Linstock Castle.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20798	Comment	Policy: n/a		RICK1
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20663	Comment	Policy: n/a		RICK1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is within the WHS buffer zone. The document does not identify this.</p> <p>The NPPF considers the WHS to be of the highest significance and therefore any harm to its significance and OUV should be wholly exceptional.</p> <p>The document makes no attempt to determine the impact the allocation and potential development of the site will have on its significance and has not undertaken an assessment.</p> <p>Currently, there is a lack of information on the archaeological status of the site. The Council needs to be very clear that without such information, it cannot be demonstrated that the site is developable without unacceptable impact on unidentified archaeology, that may put a risk to the development of the site.</p> <p>The site is also within the Rickerby Conservation Area and close to two Grade II listed buildings.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.</p> <p>Therefore, any development proposals for this site will need to demonstrate that they will conserve those elements, which contribute to the significance of the listed building and its setting. In view of the duty of the Council to preserve or enhance the character or appearance of its conservation areas including their setting, there will be need to be some assessment of what contribution this area makes to them, including views of the conservation area. If this area does make an important contribution to setting, then the plan would need to explain why its loss and subsequent development is considered acceptable.</p> <p>It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p>			
Response	<p>The Site Selection document which forms a background paper to the Local Plan will be updated to reflect the site's location within the buffer zone of the World Heritage Site. In line with the NPPF the Local Plan aims to conserve the Outstanding Universal Value, integrity and authenticity (where relevant for cultural or 'mixed' sites) of Hadrian's Wall World Heritage Site and its setting, including any buffer zone or equivalent.</p> <p>There are no designated heritage assets within the site. Decision-taking regarding potential assets requires a proportionate response by LPAs. Where an initial assessment indicates that the site on which development is proposed has potential to include heritage assets with archaeological interest, applicants will be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaeological interest only a small proportion of all planning applications justify a requirement for detailed assessment.</p> <p>Any planning application will be required to include an assessment of the impact of the development on the setting of the conservation area, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.</p>			
Proposed Change	<p>The Site Selection document will be amended to reflect the site's location within the buffer zone of the World Heritage Site/close to a Grade II listed building/adjacent to a conservation area/, and contain a brief assessment of the potential impacts on the heritage asset.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20007	Objection	Policy: n/a	308	ROo6
184	Mrs Andrea McCallum	Clerk to Rockcliffe Parish Council		
Detail	<ul style="list-style-type: none"> <li>- The site is considered too large and out of keeping for a rural community such as Rockcliffe;</li> <li>- the site projects outside the natural village boundary into open countryside;</li> <li>- foul drainage systems are thought to be at capacity;</li> <li>- concerns raised over the existing road structure and its ability to cope with extra traffic.</li> </ul>			
Response	Site ROo6 is an alternative option for a housing allocation. The site has not been allocated for housing development. It has been included in the Local Plan consultation to show other sites that were considered as part of the process leading to the selection of sites. Alternative options are not proposals for development. They will not be included in the Local Plan once the finalised version is published and subsequently adopted.			
Proposed Change	No change to the Local Plan in response to this objection.			
20587	Comment	Policy: n/a	309	SCo9
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – No access unless a house is demolished. Would be an alternative site if other sites not suitable			
Response	Comment noted.			
Proposed Change	No change to the Local Plan in response to this comment.			
20585	Comment	Policy: n/a	309	SC11
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – Members feel that this is more suitable than SCo9, would provide an alternative site if the other becomes unavailable			
Response	Comment noted.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20799	Comment	Policy: n/a		SCOT1
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1070. Stage 2 County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20800	Comment	Policy: n/a		SCOT2
194	Michael Barry	Cumbria County Council		
Detail	County Council comments see: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20030	Comment	Policy: n/a		SMo1
044	John Cornthwaite			
Detail	Some years ago the Cumberland County council recommended that the whole of site Ref SMo1 of the land adjoining Fir Ends School should be developed, but I do not consider this practical over the next 15 years. However the latest document does recognise that "there is potential for some very limited development along the frontage of this site along Skitby Road under Policy 17 of the Local Plan". This would mirror the north side of the site the present development on the south side of the site along the Longtown Brampton road. I agree that it would be inappropriate to develop the whole site.			
	I note that site SMo1 is the only alternative or preferred one in the village, but also the only one between Longtown and Brampton in the Plan. As there are no preferred sites in the area I presume this would not affect the development of this alternative site.			
Response	The development which is referred to is too small to be considered as an allocation in the Local Plan, but come come forward as a planning application.			
Proposed Change	No change proposed to the Local Plan in response to this comment.			
20684	Comment	Policy: n/a		WARW1
191	Ken Hind	Clerk to Hayton Parish Council		
Detail	Parish Council submitted copies of submissions already made: Consultee Ref: 145/17; 139/11 ; 239 Rep Ref: 20117; 20141; 20382 together with an unnamed submission commenting. The Parish council endorses all these views submitted			
Response	The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20140	Objection	Policy: n/a	WARW1	
220	Mr Terrence Ridley			
Detail	<p>I originally raised my concerns to this potential site development in Dec 2013 and are reiterated here.</p> <p>In Favour of the site: The field is conveniently flat, situated well above the flooding risk from the nearby River Eden and close for 'tapping into' existing mains services.</p> <p>Against the Site: firstly I would respectfully ask if any persons involved in the allocation of this site reside, or have resided in Little Corby or Corby Hill area? I believe that local knowledge is an important factor.</p> <p>Most of the current dwellings are north of the busy A69 road whereas most of the amenities are based on the South Side (all listed).</p> <p>The majority of residents use &amp; enjoy these facilities on a regular basis but, for many, including mothers with young children and senior citizens, it means having to cross the busy A69. Despite the welcome recent introduction of speed cameras it does not reduce people's fears and concerns of having to cross this very busy road. Obviously any further development to the Northern edge of Hurley Road would mean even further distance for residents to access the amenities.</p> <p>I understand that the proposed development would be for 60+ private dwellings (which would be half the size again of the Hurley road Estate).</p> <p>If this development proceeded, vehicle and pedestrian access would need to be (I presume) introduced from the very narrow, currently rural part, of Little Corby Road (towards Newby East). I can assure you, first hand that this is a deceptively dangerous section of road. The volume of traffic is considerably more that most people would imagine and, with our house overlooking part, I have witnessed several R.T.As with many only involving 1 vehicle by drivers being unfamiliar with the sudden dip and bend (going south towards A69), especially in the winter months when the snow and Ice 'does not give'.</p> <p>Again if developed, would highways dept be obliged to install road lighting and a suitable footpath toward the A69 and even so, wouldn't this create a very narrow road surface from the dangerous dip &amp; bend to the Haywain Pub? Again if so, would this create a short distance of one-way system? This would not bode well with local farmers and agricultural contractors who use this road regularly, often with wide loads and, especially in the silage cutting season when it is common to drive in convoy for virtually 24 hrs a day.</p> <p>I have been reliably informed that potential building contractors recently called at homes that overlooked the site asking for occupants opinions on the possible development. Apparently some home owners were offered cash incentives of above current market property values to sell their home or detached garages so contractors could demolish them to create vehicle and pedestrian access onto Hurley Road</p> <p>If this did proceed it would greatly increase traffic volume at the beginning of Hurley Road. Unfortunately I was not at home when the contractors visited.</p> <p>Also see rep No 20139 re habitat comments.</p>			
Response	<p>The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20141	Objection	Policy: n/a		WARW1
139/11	Mrs Yvonne Petry			
Detail	<p>Firstly there is no mention how this development would get access. If it is off the Little Corby Road making a new access just out of the village boundary i.e. Out of the 30mph speed limit, then I feel this access road will also increase cars at an already busy junction at the Haywain pub, along Little Corby Road.</p> <p>If the access is going to be off Hurley road, then I feel this access road from the top of the Haywain Hill into the cul-de-sacs is already quite narrow and at certain time is only one car width when parked cars reduce the road width. The extra traffic would make this area unsafe for the many children which walk this way to school and play with friends into his grass area.</p> <p>I also feel that the recently narrowed Haywain Hill to allow for the public footpath the traffic calming measures won't be able to cope with extra traffic into this development, where the footpath at the bottom is also quite narrow and is an accident waiting to happen.</p> <p>I feel in whole that this development is totally in the wrong part of the village, the infrastructure is not in place in this area to cope with the development on 1st grade agricultural land and definitely a green belt development extending the village boundary when amenities of the area, (listed) are on the other side of the A69 and will mean that children will have to cross at an accident black spot. I'm sure that development of waste land &amp; infill should get priority to the south of the A60.</p> <p>I hope you take my concerns on board, and look forward to seeing if my concerns are met.</p>			
Response	The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20074	Comment	Policy: n/a		WARW1
043	Nigel Winter	Stagecoach		
Detail	This site is too far from the nearest bus route to attract custom, the walking distance is unattractive.			
Response	The site lies close to the edge of Carlisle and there is a dedicated off road cycling and walking route between the site and Rickerby Park.			
Proposed Change	No change to the Local Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20801	Comment	Policy: n/a		WARW1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1071. Stage 2 County Council comments see:  Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.  Appendix C for Highways Comments.  Appendix E for Strategic Education Advice.</p>			
Response	<p>The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.</p>			
Proposed Change	<p>The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.</p>			
20664	Comment	Policy: n/a		WARW1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The Plan correctly identifies a Grade II listed building adjacent to the site.  The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.  Therefore, any development proposals for this site will need to demonstrate that they will conserve those elements, which contribute to the significance of the listed building and its setting.  The document does not evaluate the impact the allocation and potential development of the site will have on the significance of the heritage assets. An assessment needs to have been undertaken to justify the allocation of this site.</p>			
Response	<p>Any planning application will be required to include an assessment of the impact of the development on the setting of the conservation area, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.</p>			
	<p>The Site Selection document will be amended to reflect the site's location close to a Grade II listed building, and contain a brief assessment of the potential impacts on the heritage asset.</p>			
Proposed Change	<p>No change to the Local Plan in response to this comment.  The Site Selection document will be amended to reflect the site's location close to a Grade II listed building, and contain a brief assessment of the potential impacts on the heritage asset.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20172	Support	Policy: n/a	287	WARW1
034	Lucy Adamski			Aoo8
Detail	Explicit support for the inclusion of the land at Warwick Bridge (WARW1) as a housing allocation. Comment – please see the representation submitted by Taylor & Hardy Limited in respect of additional residential land at Warwick Bridge on behalf of their client, Hutchinson, which we support.			
Response	Support noted. The Council's Strategic Housing Land Availability Assessment (SHLAA) is being updated before the Local Plan reaches Publication stage. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and will be subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			
20586	Comment	Policy: n/a	313	WB05
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – Concerns over flooding			
Response	Comment noted.			
Proposed Change	No change to the Local Plan in response to this comment.			
20588	Comment	Policy: n/a	314	WE08
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – suitable as an alternative site			
Response	Comment noted.			
Proposed Change	No change to the Local Plan in response to this comment.			



RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20665	Comment	Policy: n/a		WETH1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is adjacent to a conservation area. Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of the conservation area and its setting.</p> <p>In view of the duty of the Council to preserve or enhance the character or appearance of its conservation areas including their setting, there will be need to be some assessment of what contribution this area makes to them, including views of the conservation area. If this area does make an important contribution to setting, then the plan would need to explain why its loss and subsequent development is considered acceptable.</p> <p>This does not appear to have been undertaken to inform the Plan.</p>			
Response	Any planning application will be required to include an assessment of the impact of the development on the setting of the conservation area, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.			
Proposed Change	<p>No change to the Local Plan in response to this comment.</p> <p>The Site Selection document will be amended to reflect the site's location adjacent to a conservation area, and contain a brief assessment of the potential impacts on the heritage asset.</p>			
20802	Comment	Policy: n/a		WETH1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1072. Stage 2 County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20666	Comment	Policy: n/a		WETH2
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is adjacent to a conservation area.</p> <p>Any development proposals for the site will need to demonstrate that they conserve those elements that contribute to the significance of the conservation area and its setting.</p> <p>In view of the duty of the Council to preserve or enhance the character or appearance of its conservation areas including their setting, there will be need to be some assessment of what contribution this area makes to them, including views of the conservation area. If this area does make an important contribution to setting, then the plan would need to explain why its loss and subsequent development is considered acceptable.</p> <p>This does not appear to have been undertaken to inform the Plan.</p>			
Response	Any planning application will be required to include an assessment of the impact of the development on the setting of the conservation area, and needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it, in line with the guidance in the NPPG.			
Proposed Change	<p>No change to the Local Plan in response to this comment.</p> <p>The Site Selection document will be amended to reflect the site's location adjacent to a conservation area, and contain a brief assessment of the potential impacts on the heritage asset.</p>			
20803	Comment	Policy: n/a		WETH2
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20667	Comment	Policy: n/a		WREA1
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is opposite a Grade II* listed building, St Mary's Church, Wreay.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II* listed building including its setting should be wholly exceptional.</p> <p>English Heritage has concerns about the potential allocation of the site for development and would like a heritage impact assessment to be undertaken before it can support the proposal.</p> <p>There are also various other Grade II listed buildings around the site.</p> <p>The NPPF considers that any substantial harm to or loss to a Grade II listed building should be exceptional.</p> <p>Therefore, any development proposals for this site will need to demonstrate that that they will conserve those elements, which contribute to the significance of the listed building and its setting.</p> <p>It is advised that an assessment be undertaken prior to the site being put forward as a site allocation in the next stage of the Plan.</p>			
Response	The site is behind the primary school which is opposite the Grade II* listed church, and is well screened by a mature tree belt. The Site Selection document will be amended to contain a brief assessment of the potential impacts on the heritage asset.			
Proposed Change	<p>No change to the Local Plan in response to this comment.</p> <p>The Site Selection document will be amended to contain a brief assessment of the potential impacts on the heritage asset.</p>			
20804	Comment	Policy: n/a		WREA1
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep No 1074. Stage 2 County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals &amp; Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
Response	The comments and further information provided by Cumbria County Council on local flood risk including surface water flooding, drainage, the historic environment, landscape, minerals and waste, education and highways are welcomed. This information, together with other site specific comments received in response to the consultation on the Local Plan, will inform the SHLAA update, and ultimately the final site selection before the Plan progresses to Publication. Eventually a comprehensive set of information will be published alongside each allocated site for the benefit of the public, landowners, developers, planning officers and others with an interest in site development.			
Proposed Change	The outcome of the SHLAA update will inform the final housing allocations for the publication stage of the Local Plan.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	

# STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent

## Stage 2 Chapter Appendix 2

20115	Objection	Policy:	n/a	
214	Mr Nicholas Bethune		Campaign for Borders Rail	
Detail	<p>The line of the Carlisle – Longtown – Borders railway is not identified on any plan or map, either in the Local Plan or in any of the Cumbria transport policy documents. A map in the 'Safeguarding Zones' section showing this and other future transport schemes is conspicuous by its absence. Please refer to our separate Consultation Response document for comprehensive details and background to this and our other comments.</p> <p>Include a map showing line of railway route to be safeguarded, namely:</p> <p>(a) Line from Mossband Junction to Longtown MoD, currently in use.</p> <p>(b) Line from Longtown MoD to Longtown, currently disused.</p> <p>(c) Line from Longtown to Kershopefoot/Scottish border, currently disused.</p> <p>(d) Land at Longtown for new alternative alignment avoiding industrial estate/former station site and providing space for new bridge to carry A7 over railway. This map could also include safeguarding of other future transport schemes formerly listed under superseded Cumbria Transport Policy 9.16. (See Figure 3, in attached Consultation Response document)</p>			
Response	<p>Comment noted, however the issue of safeguarding the route of the Borders Rail will be dealt with within the strategic transport Policy. In terms of safeguarding, the aim of this Policy is to protect sensitive areas/uses from inappropriate development e.g. Development that would have a negative effect on Ministry of Defence assets, therefore the inclusion of a railway safeguarding line would not be in line with the nature of this Policy.</p>			
Proposed Change	<p>No proposed change however reference to the Borders Rail will be picked up within the Strategic Transport Policy.</p>			

20077	Support	Policy:	n/a	
020			Essar Oil (UK) Ltd	A005
Detail	<p>On behalf of our clients, Essar Oil (UK) Ltd, Bell Ingram monitors the progress of Development Plans along the route of the North West Ethylene Pipeline which passes north-south through the Council area.</p> <p>We note that in response to our comments on the Preferred Options consultation Stage 1, Policy 47 - Safeguarding Zones &amp; Appendix 2: map of North West Ethylene pipeline now makes reference to Essar Oil (UK) Ltd Major Accident Hazard Pipeline.</p> <p>We support the inclusion of this reference in the interests of safeguarding the route of the North West Ethylene Pipeline which passes through the Council area. We agree that the Policy and Appendix Map will help to make planning officers and developers aware of the pipeline route when promoting land allocations and/or planning applications.</p>			
Response	<p>Comment of support for Policy noted.</p>			
Proposed Change	<p>No proposed change.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	