

Inspector Mrs C Sherratt  
(via Programme Officer)

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**Your ref:**  
**Our ref:** 026-PS008

12 January 2016

Dear Mrs Sherratt,

**Examination of Carlisle District Local Plan (2015 – 2030): Additional Questions in light of December 2015 Flood Events**

I write in response to the additional questions posed on the 17<sup>th</sup> December 2015, these being as follows:

- Were allocated (and omission) sites affected by the flooding events?
- If so, which ones and to what extent?
- Do they remain deliverable or developable?
- Does the SA remain an accurate assessment of any affected sites?
- Do the proposed site allocations remain appropriate?

I append a schedule which details each of the allocations contained within the Plan, as well as omission housing sites, and makes explicitly clear the impacts of flooding for each.

Whilst acknowledging that formal Environment Agency (EA) technical data confirming the accurate extent of flooding is not currently available, nor likely to be available for some time, the Council consider that the information relied upon to populate the appended schedule is nevertheless robust. This reflects that it has been ascertained following a comprehensive review of alternative available evidence including publicly available aerial and street level photography taken on and in the days immediately following the floods, as well as officer site visits. Extensive discussions have taken place with the EA who are supportive of the approach undertaken in the absence of their own data.

As the appended schedule details, the recent flooding has had no material impact on the residential allocations within the Plan, a finding supported by the EA (telephone call 6<sup>th</sup> January 2016). This reflects that due consideration was afforded to the risk of flooding in the site selection process and national guidance with respect to the sequential test fully

adhered to (an approach again commended by the EA in most recent discussions). As such all housing allocations are considered to remain deliverable / developable with no revision of the SA considered necessary. In conclusion it is the Council's belief the housing allocations within the Plan remain appropriate.

The appended schedule also demonstrates that the existing Traveller allocation within the Plan was not affected in any way by the floods nor were the majority of housing omission sites.

From an economic perspective neither of the two employment allocations were affected. Two of the three proposals within the provisions of Policy SP4 of the Plan were however significantly flooded with the impacts of each of these considered in turn below.

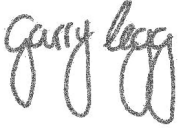
**Caldew Riverside** – This site was subject to extensive and significant flooding from the adjacent Caldew which is only partly defended along its corridor through the City. This risk of flooding was already explicitly acknowledged within the Plan and in the evidence underpinning it. The Caldew Riverside site is promoted through the Plan as a regeneration opportunity as opposed to being relied upon to accommodate any objectively assessed needs. The rationale for this is already before the examination in the Council's response to Matter 5 [EL2.012e] and is considered to remain valid. As such the floods are not considered to have had any material impact on the inclusion of this site within the Plan other than acting to reaffirm the need for detailed proposals to have full regard to the risks of flooding and ultimately the need to deliver a flood resilient mix of uses and environment.

**Land to the north of Lowther Street including Rickergate** – The Rickergate area of this broader designation was subject to extensive flooding as it had been previously in 2005, with the extent broadly aligning with that envisaged within a flood defence breach scenario considered by the SFRA. The Council maintain that it is appropriate for this designation to remain unchanged. Not all of the area was affected and there remains scope therefore to accommodate additional growth in areas not subject to the risk of flooding including the higher ground to the east of Lowther Street. Beyond this it must also be recognised that the redevelopment of this area offers an opportunity to accommodate less vulnerable land uses, including those specifically promoted, and to achieve through redevelopment opportunities a more resilient environment.

With respect to the Policy SP4 sites it is acknowledged that these and the flood risk related evidence underpinning them were already scheduled to be considered at the Matter 5 hearing session. This should provide a logical opportunity for the Council to elaborate on the above, within the context of the wider consideration of these sites, if required. It is also considered appropriate to highlight that other policies within the Plan including those relating specifically to flood risk would require proposals within these locations to be subject to and informed by a sequential and if necessary exceptions test and to be accompanied by a detailed and technically focussed Flood Risk Assessment which affords full consideration to the risks and mitigation of these.

I trust that the above helpfully clarifies the Council's position on these matters.

Yours sincerely,

A handwritten signature in black ink that reads "Garry Legg". The signature is written in a cursive style with a large, stylized 'G' and 'L'.

**G Legg**

Investment & Policy Manager

**Economic Development**

cc. Tony Blackburn, Programme Officer

## Schedule of Local Plan Allocations / Proposals / Omission Sites

Urban Housing allocations	Flood December 2015 Yes/No
U 1 and U 2 – land to the south-east of Junction 44 of the M6, Carlisle.	No
U 3 – site of current Pennine Way Primary School, Pennine Way/Edgehill Road, Harraby, Carlisle.	No. <u>Note:</u> Newman Secondary School will temporarily relocate to this site from its central Carlisle location which flooded. This is not a long term solution to relocation, and joint efforts with the City and County Council are already underway to explore alternative sites. The site remains developable in years 6 – 10 as per Policy HO 1 and existing trajectory.
U 4 - Land north of Moorside Drive/Valley Drive	No
U 5 – Land between Carleton Road and Cumwhinton Road, Carlisle.	No
U 6 – Land at Garden Village, west of junction of Wigton Road/Peter Lane	No
U 7 – land at Newhouse Farm, south east of Orton Road, Carlisle	No
U 8 – land north of Burgh Road, Carlisle	No
U 9 – site of former Morton Park Primary School, Burnrigg, Carlisle	No
U 10 – land off Windsor Way, Carlisle. U 11 – land east of Lansdowne Close/Lansdowne Court.	No
U 12 - land to the rear of the Border Terrier, Ashness Drive/Ellesmere Way, Carlisle	No
U 13 – land east of Beverley Rise, Harraby, Carlisle	No
U 14 – land north of Carleton Clinic, east of Cumwhinton Drive, Carlisle	No
U 15 – former dairy site, Holywell Crescent, Botcherby, Carlisle	No
U 16 - land at Deer Park, Belah, Carlisle	No
U 17 - land to the south-west of Cummersdale Grange Farm.	No
U 18 – land opposite Rosehill Industrial Estate	No
U 20 – land south of Durrhill Road, Botcherby	No
U 21 – former Laings Site, Stanhope Road, Carlisle	No
Rural Housing Allocations	
R 1 – land south of Carlisle Road, Brampton	No
R 2 – land west of Kingwater Close, Brampton	No
R 3 – land north of Greenfield Lane, Brampton	No
R 4 – site of former Lochinvar School, Mary Street, Longtown	No
R 5 - Land off Old Road, Longtown	No
R 6 - land west of Amberfield, Burgh by Sands	No
R 7 – land east of Cummersdale Road, Cummersdale.	No
R 8 – land adjacent to Beech Cottage, Cumwhinton	No
R 9 – land west of How Croft, Cumwhinton.	No
R 10 – land at Hadrian's Camp, Houghton.	No
R 11 – Kingmoor Park, Harker Estate, Low Harker, Carlisle	No
R 12 – land east of Monkhill Road, Moorhouse	No

R 14 – land at Tower Farm, Rickerby	No
R 15 - land north of Hill Head, Scotby	No
R 16 – land at Broomfallen Road, Scotby	No
R 17 – Warwick Bridge/Little Corby North	No
R 18 - land to the south of Corby Hill to Heads Nook road, Corby Hill	No
R 19 – Wetheral South	No
R 20 – land west of Steele’s Bank, south of Ashgate Lane, Wetheral	No
R 21 – land west of Wreay School, Wreay	No
<b>Housing Omission Sites</b>	
Rep 0329 – Houghton North	No
Rep 0229 – Hadrian’s Camp (Milbourne and Nanson 068)	No
Rep 0237 – land south of B 6264 Whiteclosegate (Milbourne and Nanson 068)	Understood to have partly.
Rep 0377 – land at Etterby	No
Rep 0876 – part field at Middle Farm, Crindledyke (Tom Woof 094)	No
Rep 0323 – Scotby North	No
Rep 0230 – land west of Scotby Road (Mrs Dixon 065)	No
Rep 0217 – land east of Harraby (JR and J Workman 060)	No
Rep 0216 – land north of U 5	No
Extension to R 17 (Adamski and Hutchinson 061)	No
<b>Traveller Allocations</b>	
Land adjacent to Low Harker Dene	No
<b>Employment Allocations / City Centre &amp; Regeneration Proposals (Policy EC 1 and SP 4)</b>	
Brunthill	No
Land south west of Morton	No
Land North of Lowther Street inc. Rickergate	Rickergate area extensively flooded. Land to the east of Lowther Street remained dry.
Caldew Riverside	Extensively flooded, except for the car park at the southern end.