Addendum to Habitats Regulations Assessment of the Carlisle District Local Plan 2015 – 2030: March 2016.

1.1 The Carlisle District Local Plan 2015 – 2030 (the Local Plan) was subject to the Habitats Regulations Assessment (HRA) process throughout its evolution including at both Preferred Options stages and the Proposed Submission Draft February 2015.

1.2 The Local Plan is now accompanied by a schedule of Proposed Modifications drawn up pre, during and post the hearing sessions during the examination of the Plan. These modifications have been subject to HRA process in order to assess whether they would alter any of the conclusions previously reached, or introduce any new impacts or effects. Changes that are only concerned with clarifying wording in the supporting text in the Plan, or in correcting typographical errors (minor modifications) or with amendments to Appendix 1 (description and technical information of allocated housing sites) and Appendix 2 (monitoring framework), are not considered to present any implications for the Local Plan as a whole to impact on European sites. Therefore only amendments to policy text have been assessed.

1.3 The assessment has therefore been concerned with the main modifications. It is important to note that no wholly new additional development sites for housing or other uses are proposed and two housing allocations have been deleted as they have been withdrawn by the site owners. The following modifications to housing sites are proposed:

- Site U 14 (land north of Carleton Clinic) the site boundary and yield has been increased to reflect the land now being taken forward for development as a result of the grant of planning permission. No likely significant effects were predicated through the planning application process as there are no identifiable pathways between the site and any European site;
- Site R 15, Scotby, has been extended to the north to encompass an additional 1.3 ha, which was the previously preferred option as a housing allocation in the Preferred Options stage 2 draft of the Local Plan. This will increase the site yield from 50 to 90. There is no identifiable pathway between this site and any European site;
- Low Harker Dene, allocation of Traveller transit provision this site is currently allocated in its entirety for Gypsy and Traveller provision. The proposed change is that the northern part of the site is proposed as a transit Traveller allocation. This site has already been assessed in the HRA, which identified that the site lies 2.5 km from the River Eden SAC. However, the M6 lies close to the site boundary, and therefore forms a barrier to any pathway between the site and the SAC.

1.4 With regard to housing delivery, the proposed modification to Policy SP 2: Strategic Growth and Distribution, introduces a stepped approach to housing

delivery, and to amend the base date from 2015 to 2013. It is important to note that this approach will not alter the overall housing target for the Plan. The modification is being proposed to tie in with key evidence to match when both population growth and job growth is expected to happen. The jobs led evidence shows a need for 478 dwellings per annum to 2020 and 626 from 2020 to 2030. The amended base date aligns with the relevant evidence in the (as set out in the Strategic Housing Market Assessment), and in practice is currently being worked to by the City Council. These modifications do not give ride to the need for additional housing numbers or sites.

1.5 It is therefore considered that the phasing of development so that housing growth matches both the demographic and economic need is a legitimate approach to housing delivery. Seeking to provide a flat rate of housing growth throughout the Plan period could mean providing more homes than there is a demographic or economic need or demand for. Such an approach would have the added benefit of allowing the development industry the time to expand and increase in capacity with Carlisle to achieve the Local Plan housing delivery rates in a more realistic stepped way.

1.6 It is not considered that this approach has any implications from a HRA perspective, as the overall quantum of development across the Plan period remains the same. As such, the proposed modification has no potential to have a likely significant effect on any European sites.

1.7 The bulk of the remaining modifications to policies are for clarity, for example, to guide how and when the policy will be implemented, in exceptional circumstances to provide cross references to other policies, or to update policies in line with recent Government policies, or imminently expected future Government policies, for example any changes to the definition of affordable housing.

1.8 As such it is concluded that the proposed modifications to the Local Plan will not result in any likely significant effects on any European sites.