

STAGE 2 REPRESENTATIONS

RepNo	Status	Paragraph	Page	Stage 2 Map:
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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.

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.

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20623	Objection	Policy: n/a	1.13	8
104	Emily Hrycan	English Heritage North West		
Detail	<p>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.</p> <p>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).</p> <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>			
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			
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.			
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.			
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.			

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Stage 2 Chapter 02

20548 Support Policy: n/a

270 Carlisle Shopping Centre Ltd A028

Detail 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.

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.

20123 Support Policy: n/a

218 Executors of Mrs M Coulson A013

Detail 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.

20213 Support Policy: n/a

077 Mr Alan Hubbard National Trust

Detail National Trust continues to support the proposed Vision.

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."

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.

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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>			
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>			
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 & Wetheral- The City Council should be more insistent.</p>			
20626	Comment	Policy: n/a	2.24 & 2.26	22
104	Emily Hrycan	English Heritage North West		
Detail	<p>We welcome recognition of the importance the Districts heritage plays in tourism and the overall economy of Carlisle.</p> <p>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.</p> <p>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.</p>			
20227	Objection	Policy: n/a	2.26	
088	Elizabeth Allnutt	Save Our Streets		
Detail	<p>Para 2.26 Culture and Heritage. The proposed Arts Centre in Warwick Street should merit a mention here.</p>			
20340	Objection	Policy: n/a	2.8	20
154/26/27	Mr Bryan Craig			
Detail	<p>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'.</p>			

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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>			
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>			
20341	Objection	Policy: n/a	25	Map 1
154/26/27	Mr Bryan Craig			
Detail	<p>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.</p>			

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Stage 2 Chapter 03

20628	Objection	Policy: n/a		26
104	Emily Hrycan		English Heritage North West	
Detail	<p>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.</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>			
20630	Objection	Policy: n/a	3.15	32
104	Emily Hrycan		English Heritage North West	
Detail	<p>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.</p> <p>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.</p>			
20629	Objection	Policy: n/a	3.5	28
104	Emily Hrycan		English Heritage North West	
Detail	<p>Reference should be made to the historic environment. Insert "historic Environment" in the list of special places.</p>			
20177	Support	Policy: S 1		
225	JR & JA Workman			Aoo8
Detail	<p>Considered to be an appropriate and considered approach in accordance with the central thrust of the NPPF.</p>			
20214	Support	Policy: S 1		
077	Mr Alan Hubbard		National Trust	
Detail	<p>The revised wording suitably addresses the concern previously expressed by National Trust.</p>			

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20228	Objection	Policy:	S 1	
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>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.</p>			
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'. 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>			
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>			
20224	Objection	Policy:	S 1	
o89	Elizabeth Allnutt	National Allotments Society		
Detail	<p>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.</p>			

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20150	Support	Policy: S 1		
223			Taylor Wimpey UK Limited	A026
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].			
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.			
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.			
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.			
20299	Support	Policy: S 1		
234	S Nicholson			A008
Detail	Considered to be an appropriate and considered approach in accordance with the central thrust of the NPPF.			
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.			

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20549	Support	Policy:	S 1	
270		Carlisle Shopping Centre Ltd		Ao28
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>			
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>			
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>			

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20705 Objection Policy: S 2

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 0985
Background information amended from previous submission; suggested Changes:

Role of Settlements

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).

Housing

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.

Commercial & Employment Proposals

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".

The infrastructure delivery plan should consider elements of the strategic infrastructure needed to help deliver growth in South Carlisle.

Natural Environment

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".

Climate Change

The text supporting this policy would benefit from making reference to localised/surface water flooding as an area of risk. (same as previous rep)

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

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20316 Comment Policy: S 2

062 Church Commissioners for England A013

Detail 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.

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.

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.

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.

20043 Comment Policy: S 2

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.

When developing employment and retail sites, consideration should be given to 'Pocket Park & Ride'. Pocket Park & 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.

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 conjusive with safety and comfort.

Nottinghamshire have such a principle in operation.

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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>			
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>			
20125	Comment	Policy:	S 2	
218	Executors of Mrs M Coulson			A013
Detail	<p>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.</p> <p>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.</p>			

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20151	Objection	Policy:	S 2	
223		Taylor Wimpey UK Limited		Ao26
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.			
20167	Support	Policy:	S 2	
034	Lucy Adamski			Aoo8
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.			
20300	Support	Policy:	S 2	
234	S Nicholson			Aoo8
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.			
20492 E2	Objection	Policy:	S 2	
264	Mrs Elizabeth Hill-Gorst	SAVE WETHERAL VILLAGE GROU		
Detail	Policy S2: How can 665 new dwellings per annum be sustainable or needed with the large amount of empty properties already build 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.			
	Comment made to SA [20491 E21]			

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20550 Support Policy: S 2

270 Carlisle Shopping Centre Ltd A028

Detail

The Spatial Strategy sets out the objective to:
 "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"

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.

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.

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.

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.

20250 Comment Policy: S 2

033 Matthew Good Home Builders Federation

Detail

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,....'.

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.

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.

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"> - 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. - 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.' 			
20342	Support	Policy:	S 2	30
154/26/27	Mr Bryan Craig			
Detail	I feel that the Spatial Strategy is correct.			
20806	Comment	Policy:	S 3	
277	Garry Moat			NR Property Ltd
Detail	<p>The key diagram identifies the land allocated for major mixed use urban extension at Carlisle South alongside the other strategic employment areas of Kingmoor Park and Morton which already benefit from planning permissions.</p> <p>Carlisle south is the subject of Policy S3 which states the scheme is to be brought forward from 2025 onwards, with a 15 year project envisaged. The proposed uses include, in particular, housing, primary and secondary schools, employment and retail facilities open space and associated infrastructure.</p> <p>In due course we will forward a copy of the submission document, which has already been discussed with officers of the Council, which presents a composite plan providing an overview of the master-plan area followed by a series of more detailed plans showing individual aspects,</p> <p>NP Property Ltd is in the process of securing control over all the land for the Carlisle South Proposals. This means the Scheme is both deliverable and flexible, in particular allowing for it's acceleration in the plan period if required by the Council.</p>			
20706	Objection	Policy:	S 3	
194	Michael Barry			Cumbria County Council
Detail	<p>Background information given; suggested Change:</p> <p>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".</p> <p>After "other infrastructure" insert; "including highways and transport. Land required for the infrastructure to support growth here will be safeguarded from development".</p> <p>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".</p> <p>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.</p> <p>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>			

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

20317 Comment Policy: S3

062 Church Commissioners for England A013

Detail

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.

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.

20044 Comment Policy: S3

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.

20178 Comment Policy: S3

225 JR & JA Workman A008

Detail

Explicit support for the introduction of this strategic growth policy, which it is felt is much needed.

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.

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.

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.

We would therefore welcome the opportunity of discussing our considered thoughts with the council at the earliest opportunity.

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.

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.			
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>			
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.			
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>			
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).			

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. 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>				

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>				

20591	Comment	Policy:	S 3	3.21 & 3.38	33 & 36
196	Mrs S Tarrant			Clerk to Cummersdale Parish Coun	
Detail	<p>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</p> <p>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.</p> <p>The local plan should include the strategy in partnership with CCC for the delivery of education provision throughout the plan to 2030.</p>				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
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."			
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.			
20533	Comment	Policy: S 4		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	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.			
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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20707	Objection	Policy:	S 4	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0986 to which amendments were made. Aditonal comments made. Suggested Changes: 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". 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". It is proposed that the policy would contain an additional criteria. This stating: "ensure that developments can be accessed by those with disability".</p>			
20229	Objection	Policy:	S 4	
088	Elizabeth Allnutt	Save Our Streets		
Detail	There needs to be reference here to Conservation Areas.			
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.			
20152	Support	Policy:	S 4	
223		Taylor Wimpey UK Limited		A026
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.			
20504 E2	Comment	Policy:	S 4	
158/33	Mrs Julie Templeton			
Detail	Conservation Areas should be included in this policy. Request: A policy			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
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>			
20633	Objection	Policy: S 4	39	
104	Emily Hrycan	English Heritage North West		
Detail	<p>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.</p> <p>An additional bullet should be inserted to read "take into consideration the historic environment including both designated and undesignated assets".</p>			
20345	Objection	Policy: S 4	39	
154/26/27	Mr Bryan Craig			
Detail	<p>Remove 'and' at the end of paragraph 9 and start all sentences with capitals to be consistent</p>			
20230	Objection	Policy: S 5		
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>There needs to be reference here to CIL or alternative methods of funding for provision and maintenance of public greenspaces.</p>			
20319	Comment	Policy: S 5		
o62		Church Commissioners for England	Ao13	
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. 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>			

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.			
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.			

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

20225 Objection Policy: S 5

o8g Elizabeth Allnutt National Allotments Society

Detail 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.

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. "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 – www.gov.uk/dclg. 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.

Paragraph 3.1 describes the four policy criteria for disposal. It also states as one of the criteria for disposal: "The implications of disposal for other relevant policies, in particular local plan policies, have been taken into account".

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.

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.

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"?

"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."

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

"3.11 The Secretary of State will consider the following when seeking to establish whether or not councils have met this criterion:

- 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.
- 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."

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.

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.

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.			
20708	Objection	Policy: S 5		
194	Michael Barry	Cumbria County Council		
Detail	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.			
20346	Comment	Policy: S 5	41	
154/26/27	Mr Bryan Craig			
Detail	Start all sentences with capitals to be consistent.			
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.			
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.			
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.			

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.			
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			

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

20551 Comment Policy: S 6

270 Carlisle Shopping Centre Ltd A028

Detail

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.

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 their 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.

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.

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:

"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."

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.

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.

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 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*.

There are also a number of other significant heritage assets which have not been mentioned here.

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.

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.

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.

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.

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.

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.

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)"

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"> - Has CCMP changed as a result of the consultation process? Is there a revised version? Can it be available to the public? - What is the relationship of the comments on the CCMP to the consultation process for the Local Plan? And vice versa. - What is the sequence of publication for the two documents? <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>			
20255	Support	Policy:	S 6	
o98		Sainsbury's Supermarkets Ltd		Ao15
Detail	<p>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.</p> <p>Representation No 0435 (was S5)</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20709	Objection	Policy:	S 6	
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p> <p>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"</p> <p>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.</p> <p>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.</p>			
20320	Comment	Policy:	S 6	
062		Church Commissioners for England	A013	
Detail	<p>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".</p>			
20289	Support	Policy:	S 6	
106		North Associates	A018	
Detail	<p>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.</p>			

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>			
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>			

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>			

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. 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>			

20710	Objection	Policy: S 7		
194	Michael Barry	Cumbria County Council		
Detail	<p>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".</p>			

20048	Comment	Policy: S 7		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			

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 04

20028 Comment Policy: 01

202 Kate Willard Stobart Group

Detail

- In the fourth paragraph in Policy 1 'Employment Land Allocations' we would prefer to see the reinstatement of the term 'Commercial Growth' to take the header for this policy section back to as was in draft 1 'Employment and Commercial Growth Land Allocations'.
- In the fourth paragraph in Policy 1 "Employment Land Allocations' we would like to see the wording redrafted to remove the wording 'aviation related activities' and see this replaced with phraseology which clearly enables development at the airport which can enable or ensure the viable operations of the airport in both an operational and commercial capacity. We are in no way planning experts but suggest something along the lines as follows; 'In the rural area, within the boundary of Carlisle Airport, development that is related to airport activities will be acceptable. In addition, enabling development that would facilitate the ongoing or further operational development of the airport will be acceptable. In the case of the latter, applicants would be required to provide clear evidence as to how any such development enabled or ensured the ongoing viable operations of the airport in both and operational and commercial capacity.'
- We note that 4.8 in Justification of Policy 1 would need amending to reflect any changes made in Policy 1 as suggested above (4.9 of draft plan as circulated).
- We note that 4.9 in Justification of Policy 1 would need amending to reflect any changes made in Policy 1 as suggested above (4.10 of draft plan as circulated).

20711 Objection Policy: 01

194 Michael Barry Cumbria County Council

Detail

Stage 1 Representation No 0990 to which amendments were made. New Background information submitted. Suggested Change:
The policy and/or its supporting text should be explicit about the economic strengths and ambitions for Carlisle to create a more explicit link between the proposed employment sites and key employment elements.

The policy or supporting text should seek to be clearer about the nature and scale of the proposed employment site at Harker to allow a fuller assessment of its implications.

The Term "negative use" seems clumsy at the end of the first paragraph. Rewording to state: "Significant adverse effect upon neighbouring uses" may be a better term/phrase.

In the last paragraph to the policy, the text; "exploration of opportunities to utilise the site" should be deleted and be replaced by text stating; "utilisation of".

In Paragraph 4.7 the last sentence should be amended to the following: "However, any use would have to be accommodated within the capacity of the existing highway network, including Junction 44 of the M6, or provide sufficient improvements to ensure the highway network has sufficient capacity to accommodate the proposed use."

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20366	Objection	Policy:	01	
121	Mike Fox	Brampton Economic Partnership		
Detail	<p>Same as original Rep 0560</p> <p>The proposed increase in housing does not appear to be matched by any increase in employment opportunities or industrial site development. The only suggested site for industrial development near to Brampton is the proposed allocation at Carlisle airfield. Even here there is a lack of clarity over what could take place on the site, what could constitute aviation related business and tepid references to not increasing traffic volumes on adjacent roads.</p> <p>Population growth carries with it demands for housing, which are addressed in the Plan, yet these may be overoptimistic, if the population is not retained due to lack of employment opportunities or growth in population is miscalculated.</p>			
20321	Support	Policy:	01	
062		Church Commissioners for England	A013	
Detail	<p>The Commissioners support the allocation of land for employment use at Morton, as indicated on Map 2 (page 54). In addition, the Commissioners' support the amendment to Policy 8 which now restricts this employment site to B1 use only. This was discussed in previous correspondence with the City Council and the policy as written now corresponds with the planning consent (reference 09/0413) obtained on behalf of the Commissioners in November 2010. This development is complementary to the masterplan for South Morton.</p>			
20256	Objection	Policy:	01	
098		Sainsbury's Supermarkets Ltd	A015	
Detail	<p>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.</p> <p>Representation No 0436</p>			
20049	Comment	Policy:	01	
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20639	Objection	Policy: 01	51	
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. 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>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. 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. 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. 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>			
20640	Objection	Policy: 01	55	Map 3
104	Emily Hrycan	English Heritage North West		
Detail	<p>The site is adjacent to the WHS Buffer Zone. 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. 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>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. 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. 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. 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>			

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

20641	Objection	Policy: 01	56	Map 4
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104	Emily Hrycan	English Heritage North West		
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Detail

The NPPF requires that 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.

The primary employment area includes a variety of heritage assets. No assessment has been made of these areas nor heritage assets been identified to inform this policy.

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.

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.

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.

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.

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

20280 Objection Policy: 02

119 Stainsby Garage Ltd A018

Detail I am writing on behalf of my Client, Stainsby Garage Ltd, to object to the document referred to above, with particular reference to Policy 2, Primary Employment Areas, and Policy 3, Mixed Commercial Areas. [See rep 20281]

My Client has an arrangement with the owners of land at Petterill Terrace, and is seeking to acquire the former Petrol Station site adjoining on London Road. The boundaries of the total site are identified, in red, on the plan submitted at the Preferred Options Consultation Stage (Ref 119).

My Client objects to the identification of this site as a Primary Employment Area on the Local Plan Preferred Options Policy Map and as White Land in respect of the former pfs and to its exclusion as a Mixed Commercial Area.

The site has been vacant and under used for some time as a consequence of dealing with contamination issues. The inclusion of the Petrol Station site currently shown as white land has led them to look at matters afresh. Fronting London Road the vacant site represents an opportunity to improve the quality of this strategic approach to the City Centre.

Sites fronting or adjacent to the main arterial routes tend to have a more diverse range of employment uses an example being the car wash site on the opposite side of London Road.

It is considered that the designation of the land as a Mixed Commercial Area would be appropriate for the following reasons:

- It would facilitate a mixture of uses bringing scale and quality to the main road frontage;
- The mixture of uses would be able to cross subsidise the development of the whole site; recouping some of the costs of remediation;
- the National Planning Policy Framework (NPPF) places significant weight on the “need to support economic growth through the planning system” and to “encourage and not act as an impediment to sustainable growth” (Paragraph 19).
- a core principle of the NPPF is to “promote mixed use developments, and encourage multiple benefits from the use of land”, recognising that mixed use developments can “bring together those who live, work and play in the vicinity” (Paragraphs 17 and 69 respectively);
- the NPPF advises that Planning Authorities should “manage patterns of growth to make the fullest possible use of public transport, walking and cycling” (Paragraph 17).

The site is sustainably located in close proximity to the City Centre with good transport links, including access to Carlisle Railway Station; and

- paragraph 70 of the NPPF emphasises that planning policies should “ensure an integrated approach to considering the location of housing, economic uses and community facilities”. The promotion of the site as a Mixed Commercial Area, would be compliant with this objective.

The need to retain sites in employment land designation is over stated and conflicts with advice in the NPPF (para 22) to avoid long term protection of sites where there is no reasonable prospect of the site being used for that purpose. The evidence base suggests a supply of between 35 and 80 years far in excess of the plan period. A pro-active approach identifying good quality employment sites that should be retained is justified. Poorer quality sites such as this should be identified as Mixed Use encouraging new uses, new investment and new economic activity.

The site should be allocated as a Mixed Use site under the terms of Policy 3.

20023 Objection Policy: 02

059 BSW Timber PLC A004

Detail In the context of the submissions made on 10th September 2013 (copy attached) it is considered that the site identified on the plan which is attached ought to be identified as Primary Employment Area. [Carlisle Sawmills, Cargo]

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees>Contact	Organisation		Agent
20712	Objection	Policy: 02		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0991 to which amendments were made. New Background information submitted. Suggested Change: It is recommended that an additional policy or further clarification be made to this policy with respect to employment uses in locations that are not considered to be "Primary Employment Areas".</p> <p>The policy would also benefit from giving further weight to highway considerations.</p>			
20012	Objection	Policy: 02		
018		The Border Group		A004
Detail	<p>In the context of the submissions made on 21st August 2013 it is considered that the site identified in the submission ought to be identified as Primary Employment Area. [Land at Woodlands, Sandysike/Whitesike]</p>			
20257	Objection	Policy: 02		
098		Sainsbury's Supermarkets Ltd		A015
Detail	<p>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.</p> <p>Representation No 0437</p> <p>Sainsbury's recommends that the reference to the development of Class A1 uses within employment areas be altered from "small component" to "appropriate scale". This change would bring the policy more in line with guidance within the Framework.</p>			
20094	Comment	Policy: 02		
210	Cllr Southward			
Detail	<p>I wish to stress the importance of ensuring a flexible approach in terms of land use with regards to regenerating brownfield industrial sites particularly within the Denton Holme area of Carlisle. For example that if a number of sites within this area become vacant, which are currently designated as primary employment areas, that their redevelopment for non-employment related uses such as housing should be considered favourably. I consider that this in part reflects the historic urban form of this area, which has seen industrial uses develop and operate alongside residential properties but which can now give rise to conflict between the two land uses through for example industrial operations adversely affecting residential amenity.</p> <p>Whilst I am encouraged to see that Policy 2 'Primary Employment Areas' does provide a positive framework which enables alternative uses to be pursued where an existing site adversely affects neighbouring uses, or where there is no reasonable prospect of the site remaining in employment use, you considered it worthy, given the unique circumstances of Denton Holme, to make a reference to this specific locality within the policy or supporting text.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20284	Objection	Policy:	02	
109		Alexandra Sawmills		A018
Detail	<p>I am writing on behalf of my Client, Alexandra Sawmills Ltd , to object to the document referred to above, with particular reference to Policy 2, Primary Employment Areas, and Policy 3, Mixed Areas [Ref 20285].</p> <p>My Client owns the land at Willowholme the boundaries of which are identified, in red, the plan provided at the preferred consultations stage (Ref 109). My Client objects to the identification of their land as a Primary Employment Area on the Local Plan Preferred Options Policy Map and to its exclusion as a Mixed Area. It is considered that the designation of the land as a Mixed Area is appropriate for the following reasons:</p> <ul style="list-style-type: none"> • the National Planning Policy Framework (NPPF) places significant weight on the “need to support economic growth through the planning system” and to “encourage and not act as an impediment to sustainable growth” (Paragraph 19). • The designation of the land as a Mixed Area could help promote opportunities to redevelop the site which may be a realistic issue within the Local Plan’s lifetime; • a core principle of the NPPF is to “promote mixed use developments, and encourage multiple benefits from the use of land”, recognising that mixed use developments can “bring together those who live, work and play in the vicinity” (Paragraphs 17 and 69 respectively); • the NPPF advises that Planning Authorities should “manage patterns of growth to make the fullest possible use of public transport, walking and cycling” (Paragraph 17). The site is sustainably located in close proximity to the City Centre with good transport links, including access to Carlisle Railway Station; and • paragraph 70 of the NPPF emphasises that planning policies should “ensure an integrated approach to considering the location of housing, economic uses and community facilities”. The promotion of the site as a Mixed Area, would be compliant with this objective. <p>Nearby sites are covered by this designation. Further mixed areas have now been identified which were covered by the previous employment land designation. Changing the designation of this site will assist in bringing forward an appropriate scale and type of development in the road corridor at this important entrance gateway to the City Centre.</p> <p>The need to retain sites in employment land designation is over stated and conflicts with advice in the NPPF (para 22) to avoid long term protection of sites where there is no reasonable prospect of the site being used for that purpose. The evidence base suggests a supply of between 35 and 80 years far in excess of the plan period. A proactive approach identifying good quality sites that should be retained is justified. Poorer quality sites such as this should be identified as Mixed Use encouraging new uses, new investment and new economic activity.</p> <p>Designation as a Mixed Use area under the terms of policy 3.</p>			
20050	Comment	Policy:	02	
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20263	Support	Policy: 02		
098		Sainsbury's Supermarkets Ltd		A015
Detail	Sainsbury's wish to show continued support for Policy 2 and its notification that uses other than B1, B2 and B8 are appropriate in existing employment sites. Notwithstanding this, in-line with representations previously made, the policy should be altered from "small scale" to "appropriate scale" ancillary facilities, which support the functioning of the Primary Employment Area will be permitted.			
20090	Comment	Policy: 02		
175	Cllr Hugh McDevitt	County Councillor Denton Holme		
Detail	<p>I wish to stress the importance of ensuring a flexible approach in terms of land use with regards to regenerating brownfield industrial sites particularly within the Denton Holme area of Carlisle. For example that if a number of sites within this area become vacant, which are currently designated as primary employment areas, that their redevelopment for non-employment related uses such as housing should be considered favourably. I consider that this in part reflects the historic urban form of this area, which has seen industrial uses develop and operate alongside residential properties but which can now give rise to conflict between the two land uses through for example industrial operations adversely affecting residential amenity.</p> <p>Whilst I am encouraged to see that Policy 2 'Primary Employment Areas' does provide a positive framework which enables alternative uses to be pursued where an existing site adversely affects neighbouring uses, or where there is no reasonable prospect of the site remaining in employment use, you considered it worthy, given the unique circumstances of Denton Holme, to make a reference to this specific locality within the policy or supporting text.</p>			
20642	Objection	Policy: 02	57	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The NPPF requires that 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>The primary employment area includes a variety of heritage assets. No assessment has been made of these areas nor heritage assets been identified to inform this policy.</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>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20232	Objection	Policy:	03	
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>All of Rickergate except the residential streets within it is designated for Mixed Use. This raises queries for Rickergate: Mixed Use Areas can also contain retail. SOS would be happy to see small independent retail and service enterprises similar to what are there already. However, SOS would be strongly opposed to any large retail development in Rickergate particularly if this involved demolition of properties. In the response to the CCMP, SOS said that they would like to see no retail development north of West Tower St and Drover's Lane. If there is a Primary Shopping Area, as described in the Local Plan, why is there also a need for Mixed Retail Use in Rickergate? This is a negation of the importance of a Primary Shopping Area.</p> <p>The proposed arts centre in the Old Fire Station building in Warwick St is in this Mixed Use Area. Will the designation conflict with the proposed use? The Arts Centre use would be welcomed by the Rickergate community and would be an appropriate use.</p>			
20024	Objection	Policy:	03	
o68		CN Group		A004
Detail	<p>In the context of submissions made on 12th September and 18th November 2013 (copies attached) it is considered that the land/property identified on the plans which are attached ought to be identified as Mixed Use Area. [Land/property at Dalston Road]</p>			

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

20281 Objection Policy: 03

119 Stainsby Garage Ltd A018

Detail I am writing on behalf of my Client, Stainsby Grange Ltd, to object to the document referred to above, with particular reference to Policy 2, Primary Employment Areas, and Policy 3, Mixed Commercial Areas. [See rep 20280]

My Client has an arrangement with the owners of land at Petterill Terrace, and is seeking to acquire the former Petrol Station site adjoining on London Road. The boundaries of the total site are identified, in red, on the plan submitted at the Preferred Options Consultation Stage (Ref 119).

My Client objects to the identification of this site as a Primary Employment Area on the Local Plan Preferred Options Policy Map and as White Land in respect of the former pfs and to its exclusion as a Mixed Commercial Area.

The site has been vacant and under used for some time as a consequence of dealing with contamination issues. The inclusion of the Petrol Station site currently shown as white land has led them to look at matters afresh. Fronting London Road the vacant site represents an opportunity to improve the quality of this strategic approach to the City Centre.

Sites fronting or adjacent to the main arterial routes tend to have a more diverse range of employment uses an example being the car wash site on the opposite side of London Road.

It is considered that the designation of the land as a Mixed Commercial Area would be appropriate for the following reasons:

- It would facilitate a mixture of uses bringing scale and quality to the main road frontage;
- The mixture of uses would be able to cross subsidise the development of the whole site; recouping some of the costs of remediation;
- the National Planning Policy Framework (NPPF) places significant weight on the “need to support economic growth through the planning system” and to “encourage and not act as an impediment to sustainable growth” (Paragraph 19).
- a core principle of the NPPF is to “promote mixed use developments, and encourage multiple benefits from the use of land”, recognising that mixed use developments can “bring together those who live, work and play in the vicinity” (Paragraphs 17 and 69 respectively);
- the NPPF advises that Planning Authorities should “manage patterns of growth to make the fullest possible use of public transport, walking and cycling” (Paragraph 17).

The site is sustainably located in close proximity to the City Centre with good transport links, including access to Carlisle Railway Station; and

- paragraph 70 of the NPPF emphasises that planning policies should “ensure an integrated approach to considering the location of housing, economic uses and community facilities”. The promotion of the site as a Mixed Commercial Area, would be compliant with this objective.

The need to retain sites in employment land designation is over stated and conflicts with advice in the NPPF (para 22) to avoid long term protection of sites where there is no reasonable prospect of the site being used for that purpose. The evidence base suggests a supply of between 35 and 80 years far in excess of the plan period. A proactive approach identifying good quality employment sites that should be retained is justified. Poorer quality sites such as this should be identified as Mixed Use encouraging new uses, new investment and new economic activity.

The site should be allocated as a Mixed Use site under the terms of Policy 3.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20291	Objection	Policy:	03	
112	Mr Connon			A009
Detail	<p>My client objects to the exclusion of their land as a Mixed Use Area on the Carlisle Urban Area Inset Map. The Council's response to our previous submission dated 16th September 2013 (our reference SG/J/C13/140) makes it clear that the Council support the change to the land use designation from a Primary Employment Area to a Mixed Use Area (L.P.A. Site Reference 112). The Council's comments stated "agree to amending the designation in line with the comments made". A copy of the Council's comments are attached. A copy of our original representation is also attached for ease of reference.</p> <p>Request: That the land use designation, as identified on the on the Carlisle Urban Area Inset Map, is amended to a Mixed Use Area in line with the supportive stance of the Council.</p>			
20274	Support	Policy:	03	
110		S & R Hall Properties		A018
Detail	<p>My Client supports the intention to identify land at The Maltings, Shaddongate, Carlisle (Objection Reference : 0533) as a Mixed Use Area.</p>			
20506 E2	Comment	Policy:	03	
158/33	Mrs Julie Templeton			
Detail	<p>Unclear if the proposed Arts Centre in the old fire station in Warwick Street fits into the category of Mixed Use Area. There is general support for the Arts Centre from the community of Rickergate. Request: A Policy</p>			
20258	Objection	Policy:	03	
098		Sainsbury's Supermarkets Ltd		A015
Detail	<p>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 0438</p>			

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

20285 Objection Policy: 03

109 Alexandra Sawmills A018

Detail I am writing on behalf of my Client, Alexandra Sawmills Ltd , to object to the document referred to above, with particular reference to Policy 2, Primary Employment Areas, and Policy 3, Mixed Areas [Ref 20284].
My Client owns the land at Willowholme the boundaries of which are identified, in red, the plan provided at the preferred consultations stage (Ref 109).
My Client objects to the identification of their land as a Primary Employment Area on the Local Plan Preferred Options Policy Map and to its exclusion as a Mixed Area. It is considered that the designation of the land as a Mixed Area is appropriate for the following reasons:

- the National Planning Policy Framework (NPPF) places significant weight on the “need to support economic growth through the planning system” and to “encourage and not act as an impediment to sustainable growth” (Paragraph 19).
- The designation of the land as a Mixed Area could help promote opportunities to redevelop the site which may be a realistic issue within the Local Plan’s lifetime;
- a core principle of the NPPF is to “promote mixed use developments, and encourage multiple benefits from the use of land”, recognising that mixed use developments can “bring together those who live, work and play in the vicinity” (Paragraphs 17 and 69 respectively);
- the NPPF advises that Planning Authorities should “manage patterns of growth to make the fullest possible use of public transport, walking and cycling” (Paragraph 17). The site is sustainably located in close proximity to the City Centre with good transport links, including access to Carlisle Railway Station; and
- paragraph 70 of the NPPF emphasises that planning policies should “ensure an integrated approach to considering the location of housing, economic uses and community facilities”. The promotion of the site as a Mixed Area, would be compliant with this objective.

Nearby sites are covered by this designation. Further mixed areas have now been identified which were covered by the previous employment land designation. Changing the designation of this site will assist in bringing forward an appropriate scale and type of development in the road corridor at this important entrance gateway to the City Centre.

The need to retain sites in employment land designation is over stated and conflicts with advice in the NPPF (para 22) to avoid long term protection of sites where there is no reasonable prospect of the site being used for that purpose. The evidence base suggests a supply of between 35 and 80 years far in excess of the plan period. A proactive approach identifying good quality sites that should be retained is justified. Poorer quality sites such as this should be identified as Mixed Use encouraging new uses, new investment and new economic activity.

Designation as a Mixed Use area under the terms of policy 3.

20095 Comment Policy: 03

210 Cllr Southward

Detail I consider that the plan should seek to prioritise the use of brownfield Land . I consider that there are a number of sites across the City that are brownfield, former industrial sites that have stood empty for a number of years. The Local Plan should be looking to widen the scope for development of these sites such as the Laings site and Rome Street former gas works / Boustead Grassing Council site to get them used. You should be looking to accept a wider range of uses on these sites and be more flexible in the interpretation of what they can be used for. The Plan should consider more mixed use development and enable new developments to be assessed on their own merits.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20091	Comment	Policy:	03	
175	Cllr Hugh McDevitt	County Councillor Denton Holme		
Detail	I consider that the plan should seek to prioritise the use of brownfield Land . I considerthat there are a number of sites across the City that are brownfield, former industrial sites that have stood empty for a number of years. The Local Plan should be looking to widen the scope for development of these sites such as the Laings site and Rome Street former gas works / Boustead Grassing Council site to get them used. You should be looking to accept a wider range of uses on these sites and be more flexible in the interpretation of what they can be used for. The Plan should consider more mixed use development and enable new developments to be assessed on their own merits.			
20111	Objection	Policy:	03	
047		McKnight & Son Builders		Ao09
Detail	<p>My client objects to the exclusion of their land as a Mixed Use Area on the Carlisle Urban Area Inset Map. A plan is attached that illustrates, in red, the extent of the site. The Council has supported the proposed change to the land use designation of two adjoining sites from a Primary Employment Area to a Mixed Use Area (L.P.A. Site References 047 and 112).</p> <p>The inclusion of my client’s land as a Mixed Commercial Area forms a logical amendment/extension to the aforementioned designation. The identification of the site as a Mixed Commercial Area will encourage opportunities for the reuse/enhancement of the appearance of the building, which would be beneficial for the area.</p> <p>My client wishes that the land use designation, as identified on the on the Carlisle Urban Area Inset Map, is amended to a Mixed Use Area in line with the supportive stance taken by the Council in respect of the adjoining sites (L.P.A. Site References 047 and 112).</p>			
20713	Support	Policy:	03	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0992 to which amendments were made.</p> <p>This policy sets out the City Council’s approach to land uses within mixed commercial areas. It proposes a flexible approach to the consideration of proposals, and details how alternative proposals are to be considered.</p> <p>In line with our previous advice, we welcome the amendments to the policy to include the requirement for an impact assessment in the case of town centre uses and for there to be recognition that they need to be compatible with the operation of the highway network and for sufficient car parking to be made available.</p>			
20110	Support	Policy:	03	
047		McKnight & Son Builders		Ao09
Detail	<p>In the context of the submissions made on the 9th September 2013 (copy attached) I can confirm that my client is please that the land use designation has been amended from a Primary Employment Area to a Mixed Use Area</p> <p>My client is also pleased that the former Mixed Commercial Area designation has been amended to a Mixed Use Area designation, as this may create opportunities to redevelopment/enhance the appearance of the site.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20445 E1	Support	Policy:	03	
254	Mr Malcolm Hannah			
Detail	May I support the development of land bordered by Denton St, Collingwood St, Lorne St and Blencowe St. I am of the view that such a parcel of land would develop into a mixed use area of residential and retail and is, I believe, earmarked with planning permission for student accommodation. Such a development would enhance the area and reinforce its role as an urban village within the city.			
20051	Comment	Policy:	03	
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.			
20714	Objection	Policy:	04	
194	Michael Barry			Cumbria County Council
Detail	<p>Stage 1 Representation No 0993 to which amendments were made. New Background information submitted. Suggested Change re-submitted: Provide new policy that presents clear vision for Carlisle City Centre and key sites within it. In developing this policy the ongoing engagement of the County Council will be very important.</p> <p>In addition, point two the policy should be revised to state: "satisfactory access for service vehicles is provided, should the scale of the proposal require such provision."</p>			
20259	Objection	Policy:	04	
098				Sainsbury's Supermarkets Ltd A015
Detail	<p>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.</p> <p>Representation No 0439</p>			

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

20552 Comment Policy: 04

270 Carlisle Shopping Centre Ltd A028

Detail

Policy 4 relates to the Primary Shopping Areas in Carlisle, and we are supportive in principle of this policy. The policy is considered appropriate in order to protect the vitality and viability of the City Centre in line with the NPPF, and will encourage appropriate growth of the City Centre over the course of the Plan. We agree with the overall recommendations set out within the Carlisle Retail Study which indicate that the City Centre should remain the key focus for retail development and we consider that wording to this effect, identifying the City Centre's role as the key retail provision in the sub-region, should be included in the policy. The reference within the proposed approach to not permitting non-retail uses where it would lead to an unacceptable concentration of such uses is concerning as we consider that the alternative is to have a number of vacant retail units in place. We therefore recommend that this element of the policy is amended to reflect this possible situation. The policy refers to the Primary Shopping Area is being used as the main town centre reference for any sequential assessment. In addition to this reference, we consider that a further sentence in the policy should be included to cross refer to Policy 6 of the Plan as follows: "Any retail development outside of the Primary Shopping Area should be subject to relevant sequential and impact assessments as consistent with Policy 6: Retail Proposals outside the Primary Shopping Area."

20507 E2 Comment Policy: 04

158/33 Mrs Julie Templeton

Detail

When the Council recently bought up property in Warwick Street for site assembly, the residents of Rickergate were told it was for an intended extension of the shopping area connected to the Lanes. The Carlisle Retail Study identified new retail within the Primary Retail Area which did not include retail development north of Drovers Lane and West Tower Street. I would welcome more clarity on what development would be allowed in Rickergate also taking into account the Flood Risk Assessment. The lack of feedback from the City Centre Masterplan consultaton does nothing to clarify this. Request: A Policy

20052 Comment Policy: 04

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.

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

20643	Objection	Policy: 04	63	
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 delivering a number of other planning objectives. No identification or assessment has been made in the Plan of the historic retail core of Carlisle City Centre or any of the other primary retail areas, which would identify the "historic attractiveness".</p> <p>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 listed buildings yet there is no mention of this 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>Given the significant historic environment in the district of Carlisle, reference to historic assets should be included.</p> <p>The Plan should be expanded to include an accurate description/assessment of the historic environment in deciding proposals for primary retail areas that in particular affect the historic environment.</p> <p>And</p> <p>Bullet point 1 should be amended to read:</p> <p>"proposals are complementary to, enhance, or do not adversely affect historic assets and the townscape of the area";</p>			

20233	Objection	Policy: 04	4.25	
088	Elizabeth Allnutt	Save Our Streets		
Detail	<p>4.25 This paragraph implies that the shopping area has been fixed according to what is described in the CCMP. Is this the case? Consultation on the two documents is running concurrently, but it is not clear which takes precedence and which document will be confirmed in which order. See the queries raised to Policy 3 Rep Ref 20232.</p>			

20053	Comment	Policy: 05		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20553	Support	Policy: 05		
270		Carlisle Shopping Centre Ltd		A028
Detail	<p>We support the spirit of this policy which aims to protect, retain or improve Primary Shopping Frontages in the City Centre, with the intention to support the positive promotion of a competitive town centre environment.</p> <p>The retail sector has experienced significant difficulties over recent years and we are supportive of a mix of town centre uses being developed in Carlisle City Centre, to enhance and improve the offer within the PSA, creating a more holistic experience for visitors with a choice of shops, restaurants, cafes, bars and other leisure uses. The priority in terms of the Local Plan and the objective of this policy should be to maintain the vitality and viability of Carlisle City Centre as the retail centre for the Cumbria sub-region. The support for complementary uses in the form of leisure and restaurants is positive and will have a positive impact in respect of improving evening activity and economy throughout the City Centre.</p>			
20260	Objection	Policy: 06		
098		Sainsbury's Supermarkets Ltd		A015
Detail	<p>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.</p> <p>Representation No 0440</p>			
20554	Support	Policy: 06		
270		Carlisle Shopping Centre Ltd		A028
Detail	<p>We support this policy and consider that it is consistent with the findings of the Carlisle Retail Study 2012 which sets out that the growth and development of Carlisle City Centre should be prioritised.</p> <p>We are supportive of the floor space threshold in respect of sequential assessments as there could be viable opportunities for such retail proposals to be accommodated within the Primary Shopping Area once a sequential assessment is applied. It is crucial however that retailing outside the Primary Shopping Area should relate to bulky goods comparison retail first and foremost. Small scale comparison retail proposals typically relate to town centre uses and should be secured within the Town Centre, specifically the Primary Shopping Area.</p> <p>The City Centre should be recognised as the heart of the community in line with the NPPF and treated as the priority location for retail with out-of-centre retail development being related to the sale of bulky goods, or subject to appropriate sequential and impact assessments.</p> <p>It is noted in recent years that retail trends have changed considerably, due to the economic downturn and the advent of online shopping becoming popularised. This has resulted in a reduction in the need of retail fascias on the high street and the reducing demand for retail space in terms of the presence on the high street. In order to secure the future of the high street and viable and successful town centres, retailing should therefore be treated as a priority in the Town Centre, particularly the Primary Shopping Area.</p> <p>We are opposed to the alternative option set out at paragraph 4.37 in relation to allowing out of centre growth for comparison retail on the basis that Carlisle is a strong and attractive retail centre serving the Cumbria sub-region and should be prioritised to grow. Allowing out of centre growth would undermine the City Centre and have a detrimental impact in terms of Carlisle's ability to retain expenditure within the District.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20715	Objection	Policy: o6		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 0994 to which no amendments were made. New Background information submitted. Suggested Change: The policy should include criteria that establish the scales of commercial/town centre development for which an impact assessment would be required where the proposed development is not on allocated sites / town centre locations.</p> <p>The text; "if a qualitative and quantitative need can be demonstrated and" should be deleted and replaced with "if".</p>			
20054	Comment	Policy: o6		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			
20644	Objection	Policy: o6	67	
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. Given the significant historic environment in the district of Carlisle, reference to historic assets should be included.</p> <p>Bullet point 4 should be amended to read: "there will be no harm to the historic environment, the visual character of the area or the amenities of adjoining land uses;"</p>			
20055	Comment	Policy: o7		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			
20555	Support	Policy: o7		
270		Carlisle Shopping Centre Ltd		A028
Detail	<p>Given the size of Carlisle City Council and the area that it covers of approximately 1,042 square kilometres, we acknowledge the need for small scale convenience shopping to be provided on a local level. We are therefore supportive of the principle of this policy.</p> <p>We consider that the inclusion of criteria 5 in the policy is important to ensure that the prioritisation of the City Centre is reiterated and that local, neighbourhood retail provision should not be proposed as an alternative to the comparison retail offer in Carlisle City Centre.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20261	Objection	Policy: 07		
098		Sainsbury's Supermarkets Ltd		A015
Detail	<p>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.</p> <p>Representation No 0441</p>			
20716	Support	Policy: 08		
194	Michael Barry	Cumbria County Council		
Detail	<p>Re-Submitted Stage 1 Representation No 0996</p> <p>It is noted that retailing at the Morton District Centre already benefit from planning permission and so the provision of retail development here is considered appropriate.</p>			
20056	Comment	Policy: 08		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p> <p>This Policy requires careful consideration as to how passenger transport may link the Morton community with this new development on a sustainable basis. The road network is crucial in this regard and early consultation is welcomed.</p>			
20689	Objection	Policy: 08		
275	Cllr Allison			
Detail	<p>I have plotted the fortunes of the city centre for the last 7 years based on figures published in our successive budgets and other data. I fully support the search for suitable city centre sites to counter the migration to out of town sites particularly Kingmoor.</p> <p>To repeat the substance of a previous submission. The anticipated Capital Receipt from the sale of the Morton site was removed from the 2014-15 budget and by implication our MTFP. There is a fundamental shift away from large format edge of town/out of town Superstores. I am not able to give an informed opinion as I am not privy to the dialogue between the City Council and potential developers, but I see little prospect of the 90,000sq.ft gross store at Morton with associated retail development within the first half of the plan period. Yet, the new Local Plan continues to retain Morton's designation as a District centre for the full term 2015 to 2030. The distance of the Morton site from the city centre is broadly similar to that of Kingmoor Park which is also pressing for a retail park.</p> <p>Morton effectively has the same status in the sequential test as the city centre and this gives it priority over other potential and substantial edge of centre sites such as the Lower Viaduct and Lowther Street. These would promote footfall in the city centre retail area identified in the GVA report. That same report tacitly acknowledges that large scale retail development at Morton could impact on the city centre.</p> <p>My concern is that there appears to be no acknowledgement or recognition in the document of a fundamental shift in retailing. I suggest that consideration be given for the Morton site to revert to its earlier status with more modest retail provision as defined in the 1996 and 2007 Local Plan. In the event of a renaissance in large out of town stores, say mid term, could its DC status not be restored under Supplementary Planning Guidance?</p>			

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

20556 Support Policy: o8

270 Carlisle Shopping Centre Ltd A028

Detail

As noted in our commentary on Policy 7 [Rep No 20555], we acknowledge the need for convenience retail to be provided on a local level. The allocation of the foodstore at Morton is supported in principle on the basis that this would not have a detrimental impact on convenience and comparison retail in the City Centre. There should however be an element of the policy which seeks to control the convenience/comparison split of floorspace at the foodstore to ensure that the development has no impact upon the provision of comparison floorspace in the City Centre.

Further, we propose that a restriction should be in place in terms of the type of comparison goods that could be sold from the foodstore, and it is considered that the sale of goods of a bulky nature would be appropriate from the premises. We have set out suggested wording to be added to the end of the first sentence of policy 8 below:

“The proposed capacity of 8,175sqm gross should include no more than 10% comparison floorspace, to relate only to the sale of bulky goods.”

Any comparison floorspace permitted as part of the proposed foodstore should not be sublet to other alternate retailers and operators. This suggestion is made to prevent the proposed foodstore from evolving into a potential retail park at the location and consequentially seeking to compete with the retail offer of Carlisle City Centre.

We are concerned that the development could exceed its allocation subject to local demand through any permitted sale of comparison goods and we would therefore ask that an additional sentence is added to the end of the policy to reiterate the prioritisation of the City Centre, as follows:

“The development of Morton District Centre shall not impede on the delivery of retail growth in the City Centre for convenience and comparison retailing.”

It is essential that no policy within the emerging Local Plan undermines the City Centre and the need to maintain the vitality and viability of the City Centre. We consider that the proposed changes to this policy would protect the City Centre over the course of the plan period.

20322 Support Policy: o8

062 Church Commissioners for England A013

Detail

The Commissioners support the development of a food store at Morton District Centre and consider it complementary to the land within their ownership at South Morton that has an implemented planning permission for residential development (reference 09/0413). There is support, therefore, for Policy 8.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20645	Objection	Policy: o8	72	
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. The site is opposite two Grade II listed buildings. 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 this site or in its justification. In particular, the policy appears to put forward the type of development to be acceptable without any assessment undertaken to determine this.</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. 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. 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. 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>			
20557	Support	Policy: o9		
270		Carlisle Shopping Centre Ltd	A028	
Detail	<p>The provision of high quality shopfronts can have a positive impact upon the character and nature of a retailing area, with quality townscapes creating opportunities for growth and vitality themselves. We are therefore supportive of this policy.</p>			
20646	Comment	Policy: o9	4.52	75
104	Emily Hrycan	English Heritage North West		
Detail	<p>This makes reference to new shop fronts being in accordance with the Shopfront SPG, this will need to be updated to reflect changes in local circumstances and national policy, given it was produced in 1994.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20061	Comment	Policy:	10	
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p> <p>Road passenger transport requires access to the kerb in order to alight and board customers safely and in a timely manner. The situation of food retailers on The Crescent in Carlisle is a good illustration as to how kerb access is restricted through indiscriminate use of bus stop area by delivery drivers and customers of the food retailer. Bus gates are a must in the City area with no waiting loading or unloading except buses, in the bus gate. The bus gate needs to be two bus lengths to allow bus access. This takes account of a vehicle parking up to the edge of the bus gate, in which case a double bus gate will still allow bus access.</p>			
20558	Support	Policy:	10	
270		Carlisle Shopping Centre Ltd	A028	
Detail	<p>This policy has been prepared in order to facilitate the creation of a vibrant and viable food and drink sector within Carlisle City Centre. We are supportive of this policy, and consider that the improvement of the food and drink provision in the City Centre would have a positive impact upon the evening activity and economy within Carlisle. As referred to above, there is the potential to extend The Lanes to accommodate a range of restaurants to complement the development of additional retail and leisure.</p>			
20619	Comment	Policy:	10	
080	Mike Downham	Carlisle Food City Steering Group	4.62	78
Detail	<p>We acknowledge and thank you for the insertion of this paragraph, which resulted from our previous submission to you. There is increasing recognition nationally of the importance of community food growing in sustainable development - see in particular the recent launch of the Planning Practice Guidance for the National Planning Policy framework in England, which explicitly supports space for food growing as part of building a healthy community. In view of this we suggest strengthening Paragraph 4.62 as follows:</p> <p>"The Carlisle Food City initiative seeks to enable Carlisle to localise its food supply. An important element in this wider aim is to increase opportunities for communities to grow some of their own food. Community food growing carries significant benefits in terms of the local economy, health and wellbeing, the environment, and community resilience. The Council will protect and support through its planning policies existing and new community food growing activities, and will aspire towards requiring the incorporation of community food growing space in all new development"</p>			
20103	Comment	Policy:	11	
212	Mr Hans Landstroum			
Detail	<p>More should be done to attract visitors and tourists to Carlisle and Cumbria more widely.</p>			
20097	Comment	Policy:	11	
210	Cllr Southward			
Detail	<p>The Plan should make reference to aspirations to replace the Bower building in St. James Park with a new community centre and sports hall.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20717	Objection	Policy:	11	
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 0999 to which Point 3 was re-worded. Additional information submitted. Suggested Change: The policy should include criteria that establish the scales of commercial/town centre development for which an impact assessment would be required where a proposed development is not on allocated sites / town centre locations.			
20093	Comment	Policy:	11	
175	Cllr Hugh McDevitt	County Councillor Denton Holme		
Detail	The Plan should make reference to aspirations to replace the Bower building in St. James Park with a new community centre and sports hall.			
20367	Objection	Policy:	11	
121	Mike Fox	Brampton Economic Partnership		
Detail	Same as original submission 0561 There appears to be no recognition or coordination of the possibilities for development to support the rich tourist offering for recreation, heritage and relaxation, that the area offers. This could even extend to the development of routes for walking and cycling and recharging points. Working with parish councils and voluntary groups could help. There are strong reasons, if the Council is serious about diversification and development, to create the ground for a community/inter community dialogue on making the most of the environment of which we boast for the benefit of local communities and visitors. Allied to this 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.			
20081	Support	Policy:	11	
063	Ms Rose Freeman	The Theatre Trust		
Detail	We support the document for this particular policy which will protect existing arts facilities and provide for new for the benefit of both residents and visitors. The general tone of this section is consistent with a new section on Health and Well-being in the recently published National Planning Practice Guidance which recommends that a range of issues should be considered through the plan-making and decision-making processes including social and cultural well-being. This takes the issue of 'health' much further than just access to doctors and sporting facilities, but doesn't specify what is meant by the term 'well-being'. We suggest that well-being is having a sense of satisfaction with life. Social and cultural well-being includes the un-measurable personal experiences that make us happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision of a variety of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc are vital for their contribution to residents' and visitors' life satisfaction and therefore is linked directly to Policy 11 for arts, culture, tourism and leisure.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20062	Comment	Policy: 11		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p> <p>Road passenger transport requires access to the kerb in order to alight and board customers safely and in a timely manner. The situation of food retailers on The Crescent in Carlisle is a good illustration as to how kerb access is restricted through indiscriminate use of bus stop area by delivery drivers and customers of the food retailer. Bus gates are a must in the City area with no waiting loading or unloading except buses, in the bus gate. The bus gate needs to be two bus lengths to allow bus access. This takes account of a vehicle parking up to the edge of the bus gate, in which case a double bus gate will still allow bus access.</p>			
20647	Objection	Policy: 11	81	
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. It also requires Local Plans to set out a clear economic vision and strategy for the area, which identifies and promotes economic growth identifying priority areas and environmental enhancements.</p> <p>Tourism and culture is of major importance to the District of Carlisle and is a major contributor to the economy (as mentioned in the Plan. This policy fails to recognise the importance of the historic environment in building a strong and competitive economy (NPPF). There has been no proper and accurate assessment of the historic environment in the District of Carlisle in the Plan. Apart from reference to the WHS, the policy could be applied to any area and does not go far enough in identifying the historic environment in Carlisle and priorities in terms of the historic environment should be specifically mentioned in the Policy rather than the supportive text. The websites (for example) www.discovercarlisle.co.uk and www.heritagecities.com and www.cumbriatourism.org detail the various elements of the District's heritage such as Carlisle Castle and Cathedral, Citadel and West Walls, the Racecourse and various museums and Parks.</p> <p>This policy should be amended to recognise the importance of the historic environment in tourism in the District and should be specific to the area.</p> <p>The Plan should also be expanded to include a proper and accurate assessment of the historic environment in the District of Carlisle in the Plan.</p>			
20217	Objection	Policy: 12		
077	Mr Alan Hubbard	National Trust		
Detail	<p>In principle the change that has been made to include a reference to heritage wording is welcomed and supported; however, it is considered that the form of words used is a little clumsy, especially the reference to the setting of the historic environment – settings generally relate to the individual heritage assets that make up the historic environment, not the 'setting of the historic environment overall.'</p> <p>A suggested alternative form of words is set out below.</p> <p>"1. The siting, scale or appearance of the proposal does not have an unacceptable adverse effect on the character of the local landscape, or upon heritage assets or their settings"</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20718	Support	Policy:	13	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1001 to which amendment were made. Comment: The draft Local Plan sets out policy with respect to the consideration of economic development proposals in rural communities. This policy as drafted reflects the earlier advice from the County Council about the importance of their being adequate access arrangements, the need for flexibility about the forms of development appropriate in rural locations and the reference to the potential role of broadband in supporting paragraph 4.81 and is therefore supported.</p>			
20323	Support	Policy:	13	
062		Church Commissioners for England	A013	
Detail	<p>The Local Plan needs to enable existing and new rural businesses to expand, especially following the changing role of agriculture and the need for new employment uses. This will also enhance the sustainability of rural areas. The Commissioners therefore support the inclusion of Policy 13 in the Local Plan, as it is considered that there is a need to strengthen the rural economy by supporting the growth and expansion of all types of business and enterprise in rural areas.</p>			
20719	Support	Policy:	14	
194	Michael Barry	Cumbria County Council		
Detail	<p>Resubmitted Supporting Stage 1 Rep 1003 This policy concerning the delivery of agricultural buildings is supported.</p>			
20324	Support	Policy:	14	
062		Church Commissioners for England	A013	
Detail	<p>Policy 14 is considered acceptable, in principle and, in line with our previous comment to the earlier consultation in July 2013, we support the inclusion of text which refers to the General Permitted Development Order (GPDO)</p>			
20720	Support	Policy:	15	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Rep 20720 to which amendments were made. The amendment to the policy to reflect earlier County Council advice is welcome.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20098	Comment	Policy:	n/a	
094	Cllr Betton			
Detail	<p>the Plan is not encouraging small business accommodation. There is lack of small business units for people who want to start businesses on a small scale or who already are a small business looking to expand other than the enterprise centre. It is difficult for small businesses and people starting. I think this is one of our key factors for growth. Suggestion for this could be old Botcherby Dairy site.</p>			

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20535 Comment Policy: n/a

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail Overview Comments

It would be helpful in assessing economy related policies to have quantifiable and evidenced information regarding the actual number and type of businesses that have displayed a firm wish to inwardly invest in Carlisle, at any time during the early to mid plan period. The release of such broadly based and anonymised data could not threaten commercial interests or be in breach of confidentiality policy.

The Economic Review of Carlisle – January 2013 clearly illustrates the perceived significant barriers to business performance and efficiency. The local road network being the most frequently mentioned, by approximately 43% of businesses in Carlisle (prior to CNDR opening); compared with only 12% that cited air linkages.

In view of the plans aims, especially its aspiration to develop Carlisle South, a southern link between the CNDR and J42 of the M6 should, therefore, be the overriding priority. The LP should clearly identify a suitable route for such a link and also protect it from potentially conflicting proposals.

With regard to Ministry of Defence land at Longtown paragraph 4.11 of the draft LP may perhaps be optimistic in its assessment of the sites early potential for development. Valued at £27.979m, in the 2007 National Asset Register, the site has been in use for almost 100 years for the manufacture and storage of munitions. After such a length of time a comprehensive Land Quality Assessment may reveal significant levels of contamination that could require well in excess of the estimated £20m - £25m clean up costs reported in January 2007.

Paragraph 3.70 of the draft LP provides a sweeping statement that Carlisle serves a large hinterland with little competition. However; this claim is difficult to support when Glasgow is just over an hour away; Newcastle only an hour or so from Carlisle, the Metro Centre under an hour and a half away, while Penrith, only a short 20 minute drive away, provides an attractive location for both shopping and inward investment. The LP's alleged lack of competition is made even more difficult to sustain when the City Council's partner, Carlisle Leisure, regularly leaches the local economy by advertising:

"The Sands Centre events team are excited to announce a new and affordable way to see some of the biggest touring musicals and shows in the country. Travel with us on our luxury coach for a day trip to remember! There'll even be time for shopping too!"

Paragraph 4.2 of the draft LP names The Carlisle Employments Sites Study as being used to inform the draft LP. The Carlisle Employments Sites Study, appearing on the Carlisle City Council website, subtitled 'Implications for M6 Corridor', states the document's main objective as being to:

"Provide a robust evidence base to underpin the preparation of the new Local Plan.

However; this document has a publication date of July 2010; as collecting and collating the original data must have taken some length of time and; as the LP is not scheduled for adoption prior to winter 2015, the document will be at least 6 years old by the time of the LP's adoption, during which time the national and local economic climate will have changed considerably. Risk therefore exists that the document may actually misinform the LP.

It is well understood that The Courts are the arbiters of what constitutes a material consideration, all the fundamental factors involved in land-use planning being included. Recent high court judgements have made it very clear that developments that may appear marginally acceptable must be supported by detailed and sustainable arguments.

Yet the draft LP makes no apparent reference to the existence, or otherwise, of a Carlisle Airport Masterplan to fully inform policy making within the context of the LP.

The Masterplan must accurately record substantiated data regarding any proposed reliance on subsidies, and must be completed and published as a matter of priority.

20027 Support Policy: n/a

50

202 Kate Willard Stobart Group

Detail - We welcome the continued inclusion of Carlisle Airport in section 4 of the Local Plan, 'Economy'.

- We welcome the continued inclusion of the introduction to this section '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.' We understand that the City Council and the widest range of broader stakeholders see Carlisle Airport as a critical element of the physical infrastructure needed to deliver sustainable economic growth for the City and the County.

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STAGE 2 REPRESENTATIONS

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Stage 2 Chapter 05

20368 Objection Policy: 16

121 Mike Fox Brampton Economic Partnership

Detail Same as original submission 0562
 The principal consideration for Brampton is future land use definitions, essentially housing. The proposed increase in housing does not appear to be matched by any increase in employment opportunities or industrial site development.
 Population growth carries with it demands for housing, which are addressed in the Plan, yet these may be over optimistic, if the population is not retained due to lack of employment opportunities or growth in population is miscalculated.

20014 Objection Policy: 16

176 Philip C Smith (Commercials) Ltd A004

Detail In the context of the submissions made on 30th August & 13 November 2013 (copies attached) it is considered that the site identified on the plans which are attached ought to be allocated for residential development. [Land to the South of Park Road, Durranhill]

20022 Objection Policy: 16

039 Client of Taylor & Hardy Ref: MEH/J/C13/115 - Jackson Trust A004

Detail In the context of the submissions made on 30th August & 13th November 2013 it is considered that the site subject to this objection ought to be allocated for residential development. [Land at Dalston]

20018 Objection Policy: 16

040 Client of Taylor & Hardy Ref: MEH/J/C12/030 - Mr Hewitt & C A004

Detail In the context of the submissions made on 30th August & 12th November 2013 (copies attached) and the amended plan (Fig No.04 Revision B, Dated 5th March 2014 which is attached) it is considered that the site subject to this objection ought to be allocated for residential development. [Land off Cummersdale Road, Cummersdale]

20122 Objection Policy: 16

217 Mrs Fiona Parkin A004

Detail Land to the South of Wetheral Road, Scotby
 In the context of the submissions made on 22nd August 2013 [copies attached] it is considered that that all/part of the site subject to this objection ought to be allocated for residential development.

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20375 Objection Policy: 16

046 Messrs Osgood A009

Detail

My client objects to the exclusion of their land, which is located to the east of Junction 42, as a proposed employment allocation (L.P.A. Reference No. 046). My previous representation identified all of the land that my clients own, which covers 105 hectares. Whilst all of their land is available for development it is not suggested that all of their land is allocated for employment use.

I have attached a copy of the previous representation, which is still relevant.

My Client would also like to make the following comments in respect of the Stage 2 Preferred Options Consultation.

The Council's assessment of my Client's land concluded that:

"The Carlisle South Masterplan will identify employment land to the south of Carlisle which relates well to J42, the land in question will be given further consideration at that time. Policy 1 will be amended to recognise this fact."

Emerging Policy 2 (Spatial Strategy) identifies that it is the Local Plan's aspiration to "Develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor including the area around J42..."

The Council's response to our previous representation is clear that this issue will be considered as part of the Carlisle South Masterplan.

My Client does not object to the principle of the Carlisle South Masterplan; however, emerging Policy S3 (Broad Location for Growth: Carlisle South) is clear that "the urban extension is phased to be delivered from 2025 onwards".

The supporting text to emerging Policy S2 highlights that the "Carlisle Employments Sites Study" and work on the "Local Economic Assessment and Economic Potential" identifies that "One of the key issues has been the quality and choice of employment locations for companies to invest." (Paragraph 3.12).

Paragraph 4.5 of emerging Policy 1 (Employment Land Allocations) explains that the Carlisle Economic Partnership Economic Review of Carlisle (January 2013) "identifies infrastructure as one of its key priorities within which enhancing and developing key employment sites at Carlisle motorway junctions is highlighted as a key action (my emphasis)."

The Council's timescale to deliver the southern extension is such the provision of any new employment land to the south of Carlisle will not be achieved until the very end of the Plan period.

To delay the delivery of new employment land to the south of the City will prejudice the Local Plan's objective to:

1. Redress the imbalance of employment land located to the north of the City (Paragraph 4.5);
2. Attract high value jobs in a location which utilises the M6 corridor (Policies 1 and S2); and
3. Provide choice of employment locations for companies to invest (Paragraph 3.2).

The only other new employment allocations include land at Kingmoor Park and land to the south of Morton.

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20288 Objection Policy: 16

232 Mr Jonathan Coulthard Cowens Ltd A018

Detail

The complex at Eller's Mill currently provides office and employment space in a traditional building. The site is properly regarded as previously developed which the NPPF seeks to encourage the use of.

The site has the potential to provide a mixture of uses including employment, possible residential conversions and new residential development in a location close to the village centre with its facilities accessible by foot. National Planning policy encourages mixed uses.

Copies of a plan showing 2 potential areas of land were provided at the Preferred Options Consultation phase together with a schematic plan showing how development could take place (Ref 111) .

It is apparent that the site is shown as being at Flood Risk on the EA map.

In reality the site has never been known to flood. It is protected by 2 sluice gates. It is separated from the River Caldw by a raised bank. The events of January 2005 and June 2012 when the river reached record heights left the site and adjoining land unaffected.

Dalston is clearly a significant settlement with a range of services and facilities.

The quantum of development proposed to be allocated whilst significant at 121 units has already been through the planning system and is likely to be built out in the early years of the Plan. Further allocations are needed to cover the whole of the plan period.

I consider that the development of the suggested site (OC51) for residential purposes:

- complies with the thrust of the policy objectives contained within the National Planning Policy Framework;
- is unlikely to raise any significant highway related issues;
- is physically well related to the built up area;
- could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties; and
- would have limited visual impact upon the wider landscape being well related to existing buildings and landscape material.

Whilst it is noted that UU say the WWTW is at capacity this should not preclude development over the whole of the plan period. Indeed further allocations are likely to act as a spur for further investment in infrastructure. Such a plan led approach appears to be the justification for providing future infrastructure as part of the LPA's approach (See Policy S3).

Taking into account the above points the allocation of the land for housing in the Local Plan 2015-2030 would be wholly appropriate and give both flexibility and choice.

The site should be allocated for residential purposes under Policy 16.

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20144 Objection Policy: 16

221 John Riley A009

Detail My client objects to the exclusion of their land, which is located within the village of Monkhill, as a proposed housing allocation. The extent of the site is identified, in red, on the attached site location plan.

Outline planning permission for the erection of 7 dwellings is scheduled to be granted following completion of a s106 to secure the provision of 2 affordable units (Application 13/0728).

The site covers 0.69 hectares and is capable of accommodating in excess of 10 units without adversely affecting the living conditions of neighbouring residents or prejudicing highway safety. The site is contained on 3 sides by residential dwellings and the visual impact of the development would be minimal. It is consider that the allocation of my clients land for residential development would:

1. boost the supply of housing in the rural area;
2. will help support services in the neighbouring villages, such as Burgh By Sands, Kirkandrews and Beaumont;
3. will help support Burgh By Sands Primary School, which is operating at half of its available capacity;
4. will increase the provision of affordable housing in the Rural Carlisle West Housing Market Area; and
5. would be in accordance with the planning consent which will be issued in the near future following the completion of a s106 agreement.

The allocation of our client's land, which is identified in red on the attached plan, as a housing allocation.

20085 Comment Policy: 16

209 Mr Peter Lamb A025

Detail This policy is broadly reasonable but in light of the National Planning Policy Framework, 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.

The policy states that the plan will 'seek to achieve 70% of all new housing development in the urban area of Carlisle, and 30% in the rural area;'. It would be more appropriate to express this in terms of the total numbers sought in the rural and urban areas (3,000 and 7,000 dwellings respectively), and as minimum figures, rather than as a ratio of the total. This would ensure that an over-delivery in the urban area does not later become a pretext for resisting housing in the rural area, for example.

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20190 Objection Policy: 16

113 Mr & Mrs Wilkinson A009

Detail

My client objects to the exclusion of their land, which is located at the eastern extent of Thurstonfield, as a proposed housing allocation (L.P.A. Site Reference No. 113). The Council's assessment of my client's land concluded that their land was unsuitable for housing development on the basis that:

"The eastern portion of the site is an open field, with a mature oak tree on the road frontage with the B5307. This part of the site does not integrate with the rest of the village, and has open countryside on three sides. It is acknowledged that whilst Thurstonfield has no services of its own, it is adjacent to Kirkbampton which has a primary school, and is also close to a number of other villages including Burgh by Sands, Moorhouse and Great Orton. However, the prominent location of this site on the edge of the village, the landscape impact, and the recent permission for 3 houses at Hill Farm, with further phases to follow, lead to the conclusion that this site should not be allocated for further housing development."

My client's site, which covers 0.62 hectares, directly abuts the eastern boundary of Thurstonfield. It is considered that the Council's assessment that "the site does not integrate with the rest of the village" is flawed.

Thurstonfield is a village with significantly limited, if any, opportunities for new infill development. As such, any new development will have to occur on the edge of the settlement.

Whilst the site is located on the edge of the village it does not mean that the development cannot be well integrated to the existing settlement. At the detailed design stage measures could be incorporated to ensure footpath links with the village. In that context, it should be noted that an existing footpath exists immediately adjacent to the south east corner of the site.

The Council has identified potential opportunities for future development at Hill Farm, Thurstonfield. There is no certainty that future applications will be submitted or if these applications will be acceptable. As such, the Council cannot rely on the supposition that further development will occur at Hill Farm.

The Stage 2 Preferred Options document is also flawed in referring to the development of the former Hill Farm as brown field land. The NPPF expressly excludes the former agricultural buildings as previously developed land.

In contrast, part of my client's site is previously developed. Paragraph 111 of the NPPF is clear that "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land)". The reuse of brownfield land is also a Core Principle of the NPPF.

Whilst the allocation of my client's land would result in the development of some greenfield land the visual impact of the scheme will be limited.

Any perceived visual impact associated with allocating the site for residential development needs to be considered in the context of the emerging Local Plan objective to provide 3,201 new homes in the rural area over the Plan period. The Policy identifies that the "need to be met from Allocations" is 1,878, whereas the cumulative number of houses proposed by the rural allocations is 1,428, which is 450 dwelling less than the target that the Plan aspires to achieve.

This shortfall raises the question regarding the soundness of the Plan, as the Plan does not appear to achieve its own identified targets for the provision of housing on rural allocations. As such, the plan is not "effective" in that the Plan cannot achieve its own targets and, therefore, its housing strategy is not deliverable over the plan period.

The Carlisle City Council Housing Need and Demand Study November 2011 (HNDS), which forms part of the Council's Local Plan evidence base, identified a need in the Rural West area for 11 affordable units per annum.

Excluding the proposed allocation in Dalston, which already has planning consent, only three allocations are proposed in the area defined by the HNDS as the Rural West area. These other three allocations, which are located at Moorhouse (10 units), Burgh by Sands (10 units) and Cummersdale (14 units), would provide 34 units in total over the Plan period.

The Council's emerging Policy 19, which relates to the provision of affordable housing, identifies new thresholds above which affordable housing will be required. Within Zone A, which includes Dalston and Cummersdale, applications for 5 or more dwellings require an affordable housing contribution of 30%. Within Zone B, which includes Moorhouse and Burgh By Sands, only proposals for 10 or more dwellings would be required to make an affordable housing contribution of 25%.

Based on the emerging affordable housing policy, these three allocations would provide 9 affordable units over a 15 year period.

The extant consent at Dalston for 121 dwellings provides 20 affordable units.

The cumulative planned affordable housing provision for the Rural West area equates to 29 units over the 15 year plan period compare with the annual need of 43 units identified in the HNDS, a requirement of 165 affordable units over the Plan period. The Local Plan falls considerably short of the affordable housing requirement identified

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in its own evidence base.

In respect of rural schools, the emerging Local Plan identifies that Burgh By Sands Primary School is operating at below half of its available capacity. It is understood, based on figures provided by Cumbria County Council, that the “numbers on role” is declining at Kirkbampton Primary School and that by 2017 the school will be operating at less than 75% of its available capacity.

The only means to decisively address the shortfall in the rural allocations housing target; the shortfall in the required level of affordable housing and to sustain the primary schools of Burgh By Sands and Kirkbampton is to allocate additional housing sites in the rural area to the west of Carlisle.

It is considered that the allocation of our client’s site provides an opportunity to address these fundamental shortcomings of the emerging Local Plan.

The allocation of my client’s land is the only planned means to deliver affordable housing in Thurstonfield.

Any perceived visual harm created by the development of the site can be mitigated through a sensitive design and is outweighed by the significant benefits that the allocation will achieve in terms of maintaining the vitality of rural communities and the delivery of affordable housing; matters which are given significant weight in policy terms.

Request: The allocation of our client’s land, which is identified in red on the attached plan, as a housing allocation.

20179 Comment Policy: 16

225 JR & JA Workman Aoo8

Detail Support the policy as a matter of land use principle given the need to provide for housing choice and growth.

Support (page 96) – explicit support for the inclusion of the land north of Moorside Drive/Valley Drive (CARL4) as a housing allocation.

16(4) - object to the omission for greenfield sites in sustainable locations to be considered alongside brownfield.

Object – the alternative housing allocation CA60 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 to provide certainty. 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.

Suggest: 16(4) – include greenfield and brownfield sites. Inclusion of site CA60 as a deliverable extension to housing allocation CARL4.

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20210 Objection Policy: 16

047 McKnight & Son Builders A009

Detail

My client objects to the exclusion of their land, which is located to the north east of California Road, as an extension to the proposed housing allocation CARL2. The Council's assessment of my client's land concluded that their land was unsuitable for housing development on the basis that: "This site is physically and visibly separated from the urban area of Carlisle, and protrudes out into the open countryside. Due to the location and shape of this site, there is very limited potential to integrate this site with the existing urban form of this part of the City. Other preferable sites are available." Our previous submission (copy attached) identified my client's land as two separate parcels, which were referenced as Site 1 and Site 2. Our letter was clear that Site 2 was available to be developed if the Council was considering a larger, strategic allocation, to the north of the city. For the purpose of this current representation, my client would like the Council to discount Site 2 from its appraisal and to focus on the suitability of Site 1 as a potential housing allocation. Since the publication of the Stage 1 Preferred Options Document the Council has recommended CARL2, as a potential housing allocation. My client's site, which covers 2.4 hectares, directly abuts CARL2. In light of the site's relationship to CARL2 it cannot reasonably be concluded that "This site is physically and visibly separated from the urban area of Carlisle, and protrudes out into the open countryside." The visual impact of developing Site 1 in conjunction with proposed allocations CARL1 And CARL2 would have limited harm on the rural landscape and it is considered that the site would be well integrated with the proposed urban form that is envisaged for the northern extent of the city. The Council's document titled "Housing Site Selection Process" identifies why allocations CARL1 and CARL2 have been selected following the publication of the Stage 1 Preferred Options Document. It is clear that CARL1 and CARL2 provide a good opportunity to provide housing to the north of the city. The Housing Site Selection Process document identifies that "Consideration should also be given to the development (CARL1 and CARL2) providing alternative access arrangements to the James Rennie School in order to help resolve school traffic related problems." James Rennie School has an existing vehicular access that leads onto California Road. The inclusion of Site 1 as part of a larger allocation provides an opportunity to provide an alternative access to the school without resulting in any unnecessary disturbance, which would otherwise occur in order to form an alternative access. A revised site location plan is attached which clearly demonstrates that my client owns the access to Site 1. This access is wide enough for two vehicles to pass and could be constructed to adoptable standards. It could provide a pedestrian and vehicular link from the CARL1 and CARL2 to California Road. The Housing Site Selection Process document recommends that CARL1 and CARL2 would require a signalised junction with the A7/C1022. In respect of recent planning applications relating to development on California Road (notably 2013/0104), the Highway Authority has identified safety issues regarding the junction of California Road and Kingstown Road, which, in the Highway Authority's view, "lies in the midst of an important signalised traffic junction". In addition to providing an alternative access to James Rennie School, the inclusion of my clients land would provide a safe, alternate, means for the residents of California Road to access Kingstown Road. The inclusion of our client's land would also provide improved links to the public footpath network, which would improve pedestrian links with California Road and provide a safer environment to encourage walking. It would also provide links to the existing footpath network that leads to Houghton. Such provision accords with the objectives of emerging Policy 64 (Public Rights of Way) and Policy S5 (Green Infrastructure). On the basis of the above, it is considered that the Council's decision to discount my client's land as an extension to proposed housing allocation CARL2 is not justified and that there are significant planning merits in including our client's land as part of allocations CARL1 and CARL2. My client and I would be happy to discuss this matter further should this be considered beneficial.

Request: The inclusion of our client's land, which is identified in red on the attached plan, as an extension to allocation CARL2.

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20191 Objection Policy: 16

226 Lynda Dixon A009

Detail

My client objects to the exclusion of their land, which is located to the west of 37-65 Scotby Road, Scotby, as a proposed housing allocation. The site was identified in the Stage 1 Preferred Options Consultation as the preferred housing site in Scotby. The site has now excluded from the Stage 2 Preferred Options document in its entirety, however, no specific assessment of the site is included within the supporting documentation.

The Council's assessment of its now preferred site at Scotby (SCOT1 - Land east of Scotby Road) makes reference to the former preferred site. It states that the land to the east of Scotby Road "has been found to have access constraints which are unlikely to be overcome".

My client has advised that this is not the case and that two options are available to purpose separate dwellings in order to create a vehicular access. Due to the commercial sensitivity surrounding these options it is not possible to publically divulge this information. My client is, however, prepared for this information to be shared confidentially with the Council.

In respect of the Council's preferred housing site (SCOT1) it is considered that this site is visually prominent from the A69 and that my client's site provides a more appropriate location for new housing development, due to its visual containment.

Due to the position of the, now, preferred site in relation to the A69 it is questionable as to whether or not this is an appropriate location for new residential development due to the impact that noise would have upon the living conditions of future residents. The preferred site is also located 1.2 kilometres from Scotby Primary School; 1.1 kilometres from the village's play area and 1.24 kilometres from the village shop.

My client's site is located considerably closer to the existing facilities and is, therefore, considered to be more sustainably located. The principle of developing my client's site for residential purposes has also been established through the recent Outline planning application to use part of the site for residential purposes (Application 13/0905).

Request: The reintroduction of our client's land as a housing allocation.

20202 Comment Policy: 16

049 Mr D Nash

Detail

It is pleasing to see that land has been allocated for housing, that very clearly indicates to developers that speculative development on other sites will be unwelcomed, however I am concerned that there is no defined statement that housing should be considered on Brownfield sites before "green fields" are developed. I note for example that the Victoria Viaduct is scheduled for industrial purposes but there is no clear supporting dialogue that demonstrates that need, we should consider redefining that site into one for housing. I recognise the argument that it is cheaper for developers to build on Green field sites first, noting that they face high land clearance costs which impact on their margins, however this should be discouraged.

I note that this council, not unlike others, requests businesses to support and sponsor, council led activities to enable it to run leisure and social activities, it is to be remembered that sponsorship impacts on the profit of firms. I suggest that we have the balance wrong as this, long term impacts, certainly on developers, who prefer green field sites, less sponsorship equates to more profit and demolishes the argument about unaffordability.

Linked to this is that the plan does not comment on the road infrastructure that the increases in development bring, it sidelines this by reference to the County Council, any final paper should contain the County Councils comment.

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20192 Site Proposal Policy: 16

051 Story Homes Ltd A010

Detail Proposal to allocate land at Beaumont Road, Carlisle

Site Location

- The Site is located to the east of Carlisle City Centre and is currently used as a paddock
- The Site is well related to Blackwell Road which is a main arterial route through the City and offers links to both the M6 via Junction 43 and the City Centre
- Local retail is nearby, the Site is surrounded to two sides by existing residential development
- Access would be gained from the existing access on Beaumont Road
- The land is designated under the previous Carlisle District Local Plan 2001 - 16 as Urban Fringe

Supporting Reasons for Inclusion of Land

- The Site was previously designated as having no flooding issues, this has recently been amended as the new Plan progresses, however, the Site has been considered by a number of engineers who believe that the Site can be brought forward and the risk of flood mitigated. Subject to the proposals being acceptable, the Site represents an area of land which can be brought forward quickly with no extensive pre- construction programme, the access road is already available to the entrance therefore construction of the units could commence in a timely fashion
- The Site is well related to existing residential uses
- The Site is small and well contained, there are limited impacts in terms of visual impact, the Site is well contained by the screen of trees and hedgerow to Wire Mire Beck and the escarpment to the rear of the Site
- The development of the Site offers the opportunity to tidy up this area which is currently home to a number of sheds etc in association with the paddock use
- The Site offers the Council the opportunity to offer a smaller housing site rather than depending on larger housing allocations, this also offers then opportunity to attract a buyer who wants to live in a smaller housing development as part of an already settled community

Conclusions

- The Site provides for the bringing forward of a smaller area of land with limited impacts on visual amenity or impacts on the existing adjacent residents
- The Site has a ready access to it and could be brought forward with the minimum of site preparation to allow for the timely provision of housing on a smaller scale to provide for a different kind of house buyer than those attracted by larger new developments
- The Site has been recently designated as a Flood Zone however, this has been reviewed and provision can be made for the storage of any potential flood water on site whilst providing a sufficient level of protection for a residential use

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20379 Objection Policy: 16

005 Paul Barton Clerk to Dalston Parish Council

Detail Concern over the high level of housing requirement per annum. At 665 houses per annum, this is a far higher build rate than Carlisle has ever had or managed and is highly likely to be unsustainable. The current Housing completion rate is 216 houses per annum, this figure is more reflective of current market demand within the district. Economic policies such as low interest rates and Help to Buy are currently supporting the new build housing market, it is likely that these policies will be withdrawn overtime casting further doubt on the sustainability of such a high Housing supply target figure. A housing supply figure of 450 homes per Annum, in line with the current Regional Spatial strategy is far more appropriate target. At the very least the District Council should adopt a flexible policy that does not bind it to an unattainable level of house Building.

A large backlog of extant permissions is a clear signal to new developers not presently in the local new build housing market that there is not sufficient demand to justify them entering it. The likely outcome of this is that a few existing developers who are in control of the extant permissions will in effect be given control of the housing supply by the District Council in the short, medium and possibly long term depending on the level of oversupply of permissions. This may reduce housing supply in the district as build rates reflect the individual strategies and risk profiles of a small number of existing developers rather than the aspirations of the District Council or market demand, whilst also restricting competition and choice.

An oversupply of new homes may undermine the existing home market and local economic drivers by increasing negative equity rates. Stagnant or falling house prices reduce the incentive to invest and upgrade the existing housing stock. This may mean an increase in empty derelict properties with all the associated problems this brings. Careful monitoring of the number of empty properties and house prices are essential, an increase in empty properties and falling/stagnant prices are leading indicators of an oversupply of houses, and should be of serious concern to the District Council.

Long term empty properties should be treated as extant planning permissions when the District Council produces its housing supply Monitoring report.

20011 Objection Policy: 16

199 Simtor Ltd A004

Detail In the context of the submissions made on 30th August & 13 November 2013 (copies attached) it is considered that the site identified on the plans that are attached ought to be allocated for residential development. [previous site WE03 land adj Hallmoor Court, Wetheral]

20168 Comment Policy: 16

034 Lucy Adamski A008

Detail Support the policy as a matter of land use principle given the need to provide for housing choice and growth. Support (page 98) – explicit support for the inclusion of the land at Warwick Bridge (WARW1) as a housing allocation. 16(4) - object to the omission for greenfield sites in sustainable locations to be considered alongside brownfield. 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.

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20252 Objection Policy: 16

033 Matthew Good Home Builders Federation

Detail

As discussed in our comments on Policy S2 [Ref No 20250] the requirement should indicate that at least 665 new dwellings per annum will be delivered. This figure may need to be increased to deal with the significant backlog in affordable dwellings.

The policy remains unclear whether 665 represents net or gross annual completions. The housing requirement is based upon an assessment of the number of net additional households that will form over the plan period. If the figure does not take account of net losses to the total housing stock over the plan period (demolitions, dilapidations, reversion of converted houses back to single dwellings, etc) then the housing requirement as expressed will be inadequate and will not address the objectively assessed need that will form over the plan period.

The figures presented within the table contained in Policy 16 remain confusing and are not adequately explained. This should be addressed to aid transparency for residents and developers alike.

It is noted that the Council has included under-delivery against the former RSS requirement of 450 dwellings per annum since 2008 which equates to 893 dwellings. This backlog has been added to the overall plan requirement. This approach is generally supported but in conformity with the NPPG this under-delivery needs to be made good early in the plan period. It is noted prior to 2008 the Council were, according to the AMR, generally meeting the former RSS requirement.

The delivery of the overall housing requirement is heavily reliant upon existing planning permissions and permissions the authority is likely to issue being developed. The combined total of these two sources accounts for 4,163 dwellings, which represents over 36% of the overall plan requirement. The Council has only provided a discount of 100 units from this source to account for any none delivery. This means that over 97.5% of all existing permission and potential future permissions are required to be built out to ensure the plan meets its requirements. This is considered an unrealistic expectation which is likely to lead to a shortfall in the overall supply of housing. It is recommended the Council provide a greater buffer to account for none or under-delivery from these sites.

The Council is also heavily reliant upon windfalls anticipating 1,575 completions on such sites, equating to 100 per annum over the plan period with 50 per annum in the first 18 months to 2015. Once again this is a significant proportion of the overall requirement equating to nearly 14% of the plan total. NPPF paragraph 48 indicates windfall allowances can be made providing there is compelling evidence such sites consistently come forward and will continue to do so. Whilst the HBF does not dispute the past supply there is a lack of a robust evidence base to suggest that such high levels of completions can be sustained throughout the plan period. This needs to be addressed or the reliance on windfalls reduced.

The combined total of windfalls and planning permissions / permissions likely to be issued accounts for nearly half of the overall plan requirement. This is considered to be unrealistic and may jeopardise the delivery of the plan. It is also likely to impact upon the demonstration of a five year supply of housing land. The HBF therefore recommends that a cautious approach is adopted to the use of a windfall allowance and planning permissions. This will require further allocations to be provided through the plan to ensure that the overall housing requirement can be delivered. This may include earlier phasing of the south Carlisle broad location for growth.

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20721	Objection	Policy:	16	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1005 to which amendments were made. New Background information submitted. Suggested Change: The policy should be clarified as calculations of existing supply appear confusing.</p> <p>The proposed annual requirement of 665 is slightly 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>The Local Plan should consider the implementation of on a phased upward trajectory for its annual housing requirement, increasing it over the plan period to coincide with the delivery of individual housing sites (e.g. Rising from 450 to 500 to 550 to 600 to 650 and so on) to achieve the average annualised dwelling requirement.</p> <p>The Local Plan should provide a clearer basis for the windfall allowance proposed within the Local Plan.</p> <p>The City Council need to ensure sufficient housing land is identified to meet the requirements of the rural areas over the plan period.</p> <p>The site specific advice in appendix B should also be carefully considered.</p>			
20019	Objection	Policy:	16	
030	Client of Taylor & Hardy	Ref: MEH/J/C11/039 - Mr Walker		A004
Detail	<p>In the context of the submissions made on 30th August & 12th November 2013 (copies attached) it is considered that all or part of the site subject to this objection ought to be allocated for residential development. [Land at Holme Close, Scotby]</p>			
20017	Objection	Policy:	16	
028	Client of Taylor & Hardy	Ref: MEH/J/C11/090 - Mr & Mrs Wils		A004
Detail	<p>In the context of the submissions made on 30th August & 12th November 2013 (copies attached) it is considered that all or part of the site subject to this objection ought to be allocated for residential development. [Land North of Old Church Lane, Brampton]</p>			
20589	Comment	Policy:	16	
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Would it make sense to create new villages close to roads with regular bus services? Alternative sites which the council considers suitable.</p> <ul style="list-style-type: none"> (i) Warwick on Eden – triangle of land adjacent to Buffs Croft/ Grahams Croft. Access available. (ii) Aglionby – fields to left and right of the access to the village from the A69. (iii) Cotehill- suggest a ribbon development from High Cotehill to Low Cotehill and behind the church. A need has been established for low cost housing in particular for the elderly. (iv) A further site in the village of Cotehill – former school would be suitable for small scale development 			

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20089	Site Proposal	Policy:	16	
209	Mr Peter Lamb			A025
Detail	Land NE of Townhead Cottage, Townhead, Hayton, Brampton, CA8 9JQ supporting submission details attached.			
20121	Objection	Policy:	16	
036	Client of Taylor & Hardy	Ref: MEH/JJ/C11/060 - Mr & Mrs Bea		A004
Detail	Land at Durdar Farm, Durdar, Carlisle In the context of the submissions made on 18th November 2013 and 30th August 2013 [copies attached] it is considered that all/part of the site identified in the SHLAA as DU03 ought to be allocated for residential development.			
20099	Comment	Policy:	16	
185	Cllr William Graham	City Councillor for Hayton Ward		
Detail	<p>I am writing with regard to some concerns that I have. In the early 1960's Corby Hill, Little Corby and Warwick Bridge were 3 distinct villages. There was a field between Little Corby & Warwick Bridge, 2 fields between Warwick Bridge & Corby Hill and 2 fields between Corby Hill & Little Corby.</p> <p>In the early 1960's there were 88 houses in Little Corby & Corby Hill and now there are 408. This is an increase of 320 houses. There is not only an increase in houses but they built the estate Hurley Road into the countryside pushing 127 houses further into the countryside.</p> <p>On the west side of the A69 there were 309 built with only 2 facilities, a public house and a butchers shop.</p> <p>On the east side of the A69 only 11 houses were built with 11 facilities, a Methodist Chapel, a surgery, a post office, a spar, a garage,, a hairdressers, a tea room, a co-op, 2 churches, a school and a community centre.</p> <p>I would suggest that any further development should be built on the east side of the A69 therefore making the village more balanced.</p> <p>If there has to be more houses built in this area, why not build them on the east side of the A69 behind the garage and up towards the Mill. Citadel Estates have already got planning permission for 18 homes behind the Co-op and up to Low buildings adjacent to the stream Cairn Beck. I feel this would create more balanced villages.</p>			
20020	Comment	Policy:	16	
201	Frank Mattinson			
Detail	0.71 HA Site put forward for housing potential [SE of Warwick Bridge Parcel ID 9073, adj Longthwaite Farm]			
20031	Objection	Policy:	16	
204	Mr & Mrs Lawson			A004
Detail	In the context of the submissions made on 21st August 2013 and 14th November 2013 (copies attached) and the Authority's decision to approve Application 13/0762 subject to a legal agreement, it is considered that the site identified on the plans which are attached ought to be allocated for residential development.			

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20078 Site Proposal Policy: 16

206 Messrs H & M Hodgson

A023

Detail Land to the South of Amberfield
 We would support the inclusion of this site within the Housing Land Allocations for the Local Plan because:

- It is a site supported by the Burgh by Sands Rural Masterplanning process (copy attached to email)
- It has an existing access provided at Amberfield
- It is suitable for a mix of housing

Our client wishes for these sites (land at Amberfield and land to the rear of North End) to be included within the Local Plan allocated for housing. I confirm that both these sites are available for immediate development.

20079 Site Proposal Policy: 16

206 Messrs H & M Hodgson

A023

Detail Land to the Rear of North End
 we would support the inclusion of this site within the Housing Land Allocations for the Local Plan because:

- It will help consolidate the village
- There are a number of access point which, if used, will improve permeability of the village
- It is suitable for a mix of housing

Our client wishes for these sites (land at Amberfield and land to the rear of North End) to be included within the Local Plan allocated for housing. I confirm that both these sites are available for immediate development.

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20209 Objection Policy: 16

038 Messrs Martin A009

Detail Land adjacent to the western side of Moorhouse
My client objects to the exclusion of their land, which is located at the western extent of Moorhouse, as a proposed housing allocation (L.P.A. Reference No. 038).

The Council's assessment of my client's land concluded that their land was unsuitable for housing development on the basis that:

"Both sites lie in flat open countryside which is visually prominent when approaching from both the B5307, and the unclassified road from Burgh by Sands. The site is physically and visibly separate from the form of the village, and with the exception of a roadside and field boundary hedge, could not be said to be well contained within existing landscape features. A preferable site is available within the centre of Moorhouse. Site 2 is immediately adjacent to the listed buildings 11 and 12 Moorhouse Courtyards."

Our previous submission (copy attached) identified my client's land as two separate parcels, which were referenced as Site 1 and Site 2.

For the purpose of this current representation, my client would like the Council to discount Site 2 from its appraisal and to focus on the suitability of Site 1 as a potential housing allocation.

My client's site, which covers 0.87 hectares, directly abuts Moorhouse and it cannot reasonably be concluded that "physically and visibly separate from the form of the village".

By definition of the existence of a roadside hedge and field boundary the site is "well contained within existing landscape features".

The site is of sufficient size to provide landscaping at its western extent of the site, which could address the Council's perception that the site is not well contained by existing landscape features.

In respect of the "form" of the development this is a matter that could be addressed at the detailed design stage; however, the layout could be comparable to the courtyard development located on the opposite side of the road. The development could be designed to incorporate "a mix of dwelling types, sizes and tenures" in accordance with criterion 3 of emerging Policy 16.

The perceived visual impact of allocating the site for residential development needs to be considered in the context of the emerging Local Plan objective to provide 3,201 new homes in the rural area over the Plan period. The Policy identifies that the "need to be met from Allocations" is 1,878, whereas the cumulative number of houses proposed by the rural allocations is 1,428, which is 450 dwelling less than the target that the Plan aspires to achieve.

This shortfall raises the question regarding the soundness of the Plan, as the Plan does not appear to achieve its own identified targets for the provision of housing on rural allocations. As such, the plan is not "effective" in that the Plan cannot achieve its own housing strategy and is, therefore, not deliverable over the plan period.

The Carlisle City Council Housing Need and Demand Study November 2011 (HNDS), which forms part of the Council's Local Plan evidence base, identified a need in the Rural West area for 11 affordable units per annum.

Excluding the proposed allocation in Dalston, which already has planning consent, only three allocations are proposed in the area defined by the HNDS as the Rural West

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area. These other three allocations, which are located at Moorhouse (10 units), Burgh by Sands (10 units) and Cummersdale (14 units), would provide 34 units in total over the Plan period.

The Council's emerging Policy 19, which relates to the provision of affordable housing, identifies new thresholds above which affordable housing will be required. Within Zone A, which includes Dalston and Cummersdale, applications for 5 or more dwellings require an affordable housing contribution of 30%. Within Zone B, which includes Moorhouse and Burgh By Sands, only proposals for 10 or more dwellings would be required to make an affordable housing contribution of 25%.

Based on the emerging affordable housing policy, these three allocations would provide 9 affordable units over a 15 year period.

The extant consent at Dalston for 121 dwellings provides 20 affordable units.

The cumulative planned affordable housing provision for the Rural West area equates to 29 units over the 15 year plan period compare with the annual need of 11 units identified in the HNDS, a requirement of 165 affordable units over the Plan period. The Local Plan falls considerably short of the affordable housing requirement identified in its own evidence base.

In respect of rural schools, the emerging Local Plan identifies that Burgh By Sands Primary School is operating at below half of its available capacity. It is understood, based on figures provided by Cumbria County Council, that the "numbers on role" is declining at Kirkbampton Primary School and that by 2017 the school will be operating at less than 75% of its available capacity.

The only means to decisively address the shortfall in the rural allocations housing target; the shortfall in the required level of affordable housing and to sustain the primary schools of Burgh By Sands and Kirkbampton is to allocate additional housing sites in the rural area to the west of Carlisle.

It is considered that the allocation of our client's site provides an opportunity to address these fundamental shortcomings of the emerging Local Plan. My client's site is not proposed as an alternative site to the recommended allocation in Moorhouse, but as an additional housing site. The allocation of both sites "provides a realistic choice of achieving the planned supply and to ensure choice and competition in the market for land" (Paragraph 47 of the NPPF).

Any perceived visual harm created by the development of the site can be mitigated through a sensitive design and is outweighed by the significant benefits that the allocation will achieve in terms of maintaining the vitality of rural communities; a matter that is given significant weight in policy terms.

Request: The allocation of our client's land, which is identified as Site 1 on the attached plan, as a housing allocation.

20153 Objection Policy: 16

223 Taylor Wimpey UK Limited A026

Detail Policy 16 seeks to deliver 665 dwelling per annum over the plan period. Again, Taylor Wimpey UK Limited objects to the delivery of 665 dpa until the Council provides more up to date evidence on objectively assessed housing needs. Policy 16 indicates that the need to be met by allocations should comprise a total of 5,905 dwellings. It also lists a number of potential sites and their delivery. Taylor Wimpey objects to Policy 16 on the basis that it fails to identify land at Deer Park within the total allocated sites in Carlisle Urban Area.

Vison for Deer Park has been submitted with the representation.

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20197 Site Proposal Policy: 16

051 Story Homes Ltd A010

Detail PROPOSAL TO ALLOCATE LAND AT HOUGHTON, CARLISLE

Site Location

- The Site is currently farmland to the east of Houghton
- The Site is well related to the village and to the wider facilities on offer within Carlisle City, also to Junction 44 of the M6 and the A69
- The Site has good links to the strategic employment site of Kingmoor Park
- Access can be gained from Houghton Road

Supporting Reasons for Inclusion of Land

- The Site is noted within the Alternative Options to the Preferred Housing Allocations, it Site offers the Council the opportunity to provide meaningful housing numbers with good access to the facilities within Carlisle Urban but in a rural setting, it also provides a good alternative to the reliance of high numbers being delivered in Carlisle should these not come forward as it provides for a different market
- The Site offers little visual or amenity value to Houghton. It is situated towards the physical barrier of the M6 but allows for an area of strategic planting to be employed, softening the approach to the village which is currently defined by the rear of houses
- The Site is sustainable with the strategic employment location of Kingmoor Park nearby, houses in this location could offer the opportunity for homeowners to travel to work without placing extra loads on the roads within the City Centre
- There are no designations which would prevent the Site coming forward
- The Site offers rural living with the advantage of close links to the Urban Centre

Conclusions

- The Site forms an appropriately sized extension to Houghton which, whilst a village, enjoys close proximity to Carlisle City, increasing opportunities to access jobs, leisure and retail sustainably and without complete reliance on the private car
- The Site provides an opportunity to realise housing numbers close to Carlisle but not in Carlisle itself, offering a wider choice to new home owners
- The Site is genuinely capable of development and there are no known constraints which would prevent its coming forward and delivering the numbers needed to support housing

20120 Site Proposal Policy: 16

057 Client of Taylor & Hardy Ref: MEH/J/C13/057 - Armeria (UK) A004

Detail Land at Lonning Foot, Rockcliffe

In the context of the submissions made on 10th September and 18th November 2013 [copies attached] it is considered that the site identified on the plan which is attached to the submission ought to be allocated for residential development.

Additional information relating to highways aspects of tehe residential developemnt on the proposed site submitted 04/04/14 from WYG Transport via agent

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20381 Objection Policy: 16

238 Mr & Mrs Tyler

Detail Disregarded Site CUWo4 - Land East of Peter Gate

With reference to the above and the site assessment we would be pleased if Carlisle City Council could re-consider bearing in mind the following comments :-

1. The main concern of the report is the "significant issue relating to this site is the congested nature of the road at peak times for school drop off and pick up" - The proposed site could incorporate a number of car parking places designated for school use to alleviate some or all of the congestion.
2. Building of a new school in a separate location within the village of Cumwhinton (assuming this happens within the 2015 - 2030 timescale) would remove the congested road problem - we would then consider the site would be reassessed .
3. The proposed site lies directly to the east of the houses fronting Peter Gate. The site is adjacent to the houses and there is no land gap between the two.

The adjacent fields to the south cannot or would be difficult to build upon due to local "British Gypsum" mine workings and therefore the defined southern boundary edge of Cumwhinton would be the proposed site.

20374 Site Proposal Policy: 16

237 Parker (Landowner)

A023

Detail Land to the west of the Grove, Scotby

Reasons for supporting this site- the site is essentially located within the centre of Scotby and has access opposite the new Story development immediately to the north. Development here will counter the linear existing form of Scotby, thus creating a more compact village. The site is approx 4 HA which together with structural landscaping could provide approx 100 dwellings which would significantly contribute to the housing delivery in Carlisle. The site does not fall within a flood zone nor have any other known constraints. The site assessment by CABE suggests a suitable site subject to visibility assessment to the north & east. Any concerns of visibility to that direction could be overcome through structural [planting and the existing embanked railway line.

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

20293 Objection Policy: 16

064 Messrs Osgood Aoog

Detail My client objects to the exclusion of their land, which is centrally located in the village of Wreay, as a proposed housing allocation (L.P.A. Reference No. 064). The Council's assessment of my client's land concluded that their land was unsuitable for housing development on the basis that:
 "The proposed site extends to some 3 hectares and is attractive, open parkland type landscape fringed by mature trees. There are open views to the Grade II * listed St Mary's Church to the south, and the Grade II * listed Sexton's Cottage to the north. The landscape impact of the development of this site, together with the impact on the listed buildings, is considered unacceptable. In addition, the site is wholly out of scale with the rest of the village."

Whilst the Council's assessment of the site refers describes the site as an "attractive, open parkland type landscape" it is working agricultural land, which has the potential to be used for a variety of agricultural purposes. The site's perceived attractiveness at the time of the Council's assessment should not influence whether or not the site should be developed.

Our previous submission, on behalf of our client, was clear that whilst the full extent of our client's ownership was identified, it was not proposed that all of the site should be developed. More importantly, it was suggested that the extent of land available would enable the site to be developed in a way that was sensitive to the setting of the listed buildings, but also the loosely arranged character of the village.

The availability of land, which can be served by various points of access, will enable this site to be developed in sensitive way that avoids the need for an "estate style" housing scheme. It is considered that this is one of the fundamental benefits that my Client's site offers over the proposed allocation in Wreay, which could appear as a small estate tagged onto the side of the village, wholly unrelated to the adjacent properties. Such a proposal would clearly be harmful to the setting of this historic village. If the Council were minded to support the principle of allocating some of my Client's land for residential development my client has indicated a willingness for the southern extent of their land, which abuts the Grade II* listed St. Mary's Church to be designated as a village green/community space. This would improve pedestrian connectivity between the houses on the east of the village and the school on the west. It would also provide an important community facility that would otherwise not be delivered and would assist in safeguarding the setting of St. Mary's Church in perpetuity.

Request: The allocation of some our client's land as a housing allocation, together with the formation of a village green/community area.

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

20389 Site Proposal Policy: 16

243 Mr R Hutchinson A027

Detail land at Corby Hill - marked 4 on the Warwick Bridge, Corby Hill & Little Corby Rural Masterplanning
 Land submitted to be allocated in conjunction with the Allocation WARW1 as part of a combined strategic allocation which offers the Council a significant opportunity to deliver the objectives and aspirations of the emerging Local Plan over the whole plan period
 It is considered the combined allocations:
 - would significantly enhance the vitality & vibrancy of the rural community by delivering a greater number of homes in a highly sustainable location
 - is of a scale proportionate to the size and character of Little Corby & Warwick Bridge
 - forms a natural extension to the existing built of the settlement with very limited landscape or visual impact
 - benefits from and will also support the wide range of services available in the Warwick Bridge/Corby Hill area which includes a school, shops, public transport, public houses and community facilities
 - encourages the use of public transport, walking and cycling routes available in the area
 - promotes healthy communities by creating connectivity with green infrastructure network
 - makes use of existing access opportunities through Hurley Road without significant infrastructure improvements to the existing residential area
 - offer a significant contribution to the availability of affordable housing in the rural area

The rationale for this view is set out in the accompanying letter.

20034 Objection Policy: 16

094 Cllr Betton

Detail We should be and are not doing enough to promote building more on brown field sites as there are many in Carlisle and more encouragement of the use of these brownfield sites rather than green field sites which are always necessary for local peoples enjoyment.
 Referring back to Brown field there is a perfect opportunity for development on the lower viaduct at Caldew Riverside and beyond which is one example amongst a host of others.

There is also opportunity to encourage and develop old redundant buildings for housing accommodation, one example is the old Citadel. We can exert more of an effort and should to encourage this as there are many other redundant buildings we could use for housing development.

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

20700 Comment Policy: 16

095 Sabaa Ajaz United Utilities

Detail Wastewater Comments

United Utilities requests that landowners and applicants engage with United Utilities at an early stage with details of surface water and foul water drainage proposals in advance of the submission of an application for new development on both allocated and windfall sites. United Utilities expresses a preference to minimise the reliance on windfall sites in developments plans. We consider a plan led approach which allocates sites to be the most appropriate avenue to inform our strategic asset planning process as it provides us with greater certainty over the quantum and location of development which is most likely to come forward to meet the needs of a borough. In the settlement of Wetheral, United Utilities notes the proposed allocation of two housing development sites which are:

- WETH1 Wetheral South (indicative yield of 50 dwellings); and
- WETH2 Land west of Steele's Bank, South of Ashgate Lane (indicative yield of 50 dwellings).

United Utilities makes the following comments / requests in relation to the above referenced sites:

1. As discussed with officers, please confirm site boundaries for WETH1 (Wetheral South) where you have estimated a reduction in the number of dwelling units compared with the number of dwellings which were estimated as deliverable at the preferred options stage 1 consultation. The estimated dwelling yield at this site has reduced from 98 dwellings to 50 dwellings;
2. greater understanding of why low density is proposed on both sites;
3. United Utilities requests that the Council considers including the proposed low density of 50 dwellings for WETH1 and WETH2 as an explicit policy requirement. This provides United Utilities with a greater indication of the quantum of development expected to be delivered in this village location. United Utilities strongly emphasises the surface water hierarchy and the importance of surface water being directed to alternatives to the existing sewer network;
4. details of proposed surface water management which will enable United Utilities to better understand the impact of development on its infrastructure; and
5. anticipated timescales for commencement of development and the likely build rate so United Utilities can better understand the impact on its infrastructure.

The above information will allow United Utilities to understand in greater detail the impact of new development on infrastructure, any infrastructure improvements that may be needed and any potential need to coordinate such improvements with the delivery of development.

United Utilities recommends that all development proposals are required to investigate the surface water hierarchy to minimise the impact of surface water on wastewater infrastructure network as this results in reduced capacity, which in some circumstances can lead to flooding and an impact on the environment. In order to protect existing customers and the environment, it is suggested that landowners / applicants promoting land for development adopt sustainable drainage methods or consider discharging surface water to a watercourse at an attenuated rate including an allowance for climate change. United Utilities welcomes early engagement with landowners and developers to discuss proposed drainage details further.

Water Supply Comments

With regards to clean water, United Utilities notes the sites identified for development. Modelling investigations will be required to ascertain the extent of capacity available in Morton as and when development schemes progress, specifically for sites referenced CARL6 and CARL7. United Utilities offers a pre-development enquiry service which is available online for clean water and wastewater: <http://www.unitedutilities.com/builders-developers.aspx>. We recommend that developers consult our Water Developer Services colleagues early to understand any water supply implications for the development, in particular, in respect of sites CARL6 and CARL7.

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

20207 Objection Policy: 16

103 Kingmoor Park Properties A017

Detail

HEATHLANDS INDUSTRIAL ESTATE, HARKER ROAD ENDS

HOW Planning has been instructed by KPPL to submit a representation in relation to the above. The representations have been prepared in order to demonstrate the suitability of land at Heathlands Industrial Estate, Harker Road Ends to accommodate residential development. The site extends to 10.22 Ha and is capable of providing approximately 300 residential units.

The site has not been included as a residential allocation within the Preferred Options version of the Local Plan but there are very clear and compelling reasons why it should be.

The site is currently partially used for employment purposes however the buildings on site are historic and extremely expensive to maintain. The rental income from occupiers is very limited, as are the number of jobs supported.

The site is been assessed by the Council as part of its Employment Land Review (ELR). The Review (which incorporates this site alongside Harker and Rockcliffe as 'Kingmoor Park – Northern Sites') gives it a rating of 37% overall which ranks it 48th of 54 employment sites included. It concludes that the site should be retained as an employment use while still in operation but in the long term a flexible policy should be proposed for the site to allow alternative uses to be considered.

The ELR is clear therefore that employment uses are not sustainable in the long term but report stops short of suggesting any alternative use.

It is noted that the Council is extremely reliant upon Greenfield land to deliver its residential housing requirement over the plan period with very few brownfield sites identified. Spatial Policy S2 is clear that the Council intends to make best use of previously developed land for new development. In accordance with this policy it is considered that the most appropriate use of the land at Heathlands would be for residential purposes.

The Council's proposed allocation of Harker Industrial Estate for residential use is welcomed. There are many parallels between that site and this, and KPPL considers that the merits of allocating the land for housing are strong. It is clear that the future of the site for employment purposes is uncertain at best, and it would be a positive approach to the preparation of the new Local Plan if the Council was to allocation this land for housing to help meet an identified need.

The sustainability credentials of the site have been greatly enhanced through the housing development located almost immediately to the south at Crindledyke, which will offer new services and facilities. It is considered that should the Council consider it necessary a bus service could be extended to the site as the roads which service the current employment site are certainly adequate to serve such a purpose.

The NPPF is clear that sites which are no longer suitable for employment use should be released for alternative uses as part of Local Plan reviews where appropriate. Given it is clear that the site has a limited future in its current guise, it is recommended that the Council should take a positive and proactive step of allocating the land for housing in order that it can make a significant contribution towards its forward housing supply.

Summary

KPPL wish to promote the use of Healthlands Industrial Estate for residential use as part of the Preferred Options consultation on the emerging Local Plan.

The land is currently of very limited value to the local economy, employing a very limited number of people and generating a return to the owners which is insufficient to maintain it in the long term.

It scores very poorly in the Council's own ELR, which recommends that it would be appropriate to consider allocating the site for an alternative use.

There is an ample amount of quality employment land nearby which is more than sufficient to meet current and future demand, whilst the Council is extremely short of brownfield land for future housing development.

The site is certainly sustainable, particularly given the proximity of the new housing development at Crindledyke which will provide a number of new services and facilities very close to the site.

The Council is encouraged to take the proactive step of allocating the site for residential development, which would be much more suitable than the existing use.

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20325 Comment Policy: 16

062 Church Commissioners for England A013

Detail

It is vital that the Local Plan housing strategy meets the housing needs for the district for both the City of Carlisle and its more rural areas. The housing target should be exactly that; a target, not a capped figure. This will ensure that the policy is in accordance with the NPPF and the need to boost significantly housing development throughout the district.

However, in association with criterion 2) of Policy 16, the Policy 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.

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.

Notwithstanding the above, we support the inclusion of the text "seek to achieve 70% of all new housing developments in the urban area..." on the understanding that these development aspirations are targets, not ceilings.

With regard to housing types, although it is important to plan for a wide range of housing mix throughout the district to ensure that all needs are catered for, it can be unviable to dictate housing mix on smaller development sites and potentially lead to a site becoming non deliverable. Therefore, large scale developments being promoted within the next plan period should utilise the evidence provided by the SHMA, ensuring a mix of housing is being provided, - although should not be dictated by it - whilst allowing small housing sites to come forward independently as these sites can easily become unviable if too many onerous requirements and planning obligations are placed up on them.

In addition, it is vital that the Council stipulate in their Local Plan that the final housing numbers for the district do not include the provision for institutional housing (e.g. nursing homes, student accommodation etc). This should be an additional figure to the housing need for the Borough.

20200 Site Proposal Policy: 16

051 Story Homes Ltd A010

Detail PROPOSAL TO ALLOCATE LAND AT BLACKWELL, CARLISLE

Site Location

- The Site is currently farmland to the South of Carlisle City Centre
- The Site is well related to transport links both into Carlisle City Centre and also to Junction 42 of the M6
- The site is bound to the north by a recently consented and under construction housing development and the to west by existing residential uses. Agricultural land bounds the remainder
- Access is to be gained from Durdar Road and Scalegate Road
- The Site would form part of the wider proposals for the development of South Carlisle

Supporting Reasons for Inclusion of the Land

- The Site is noted as an Alternative Option within the Preferred Options document. The Preferred Options document notes in Policy S3 - Broad Location for Growth: Carlisle South, it is considered that the Policy should have some standing in the housing policies also and that the land at Blackwell would provide a sensible extension of the housing development currently undergoing construction. This extension could feasibly be carried out as a first phase to Carlisle South or as a standalone phase.
- The Site is sustainable with good links to Carlisle City Centre and the employment provided there. The City Centre also provides for the secondary schools which service the south and east of Carlisle.
- There are no nature designations or ground conditions which would preclude the use of the Site for housing
- Public transport is available from either Durdar Road or Scalegate Road
- The scheme currently under development has been designed to enable green links and pleasant walking routes to service the wider site providing linkages to Hammonds Pond for leisure and primary schools within the urban area

Conclusions

- The Site forms a logical extension of the Carlisle Urban area and would form part of the Carlisle South expansion, it is considered that Policy S3 should be repeated or referred to in the Housing Policies section
- The Site is well related to existing housing and leisure opportunities at Hammonds Pond, in addition it is on a public transport route to Carlisle City Centre
- The Site is genuinely capable of development and there are no known constraints which would prevent it coming forward and supporting the delivery of the required completions for Carlisle City.

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20309 Objection Policy: 16

103 Kingmoor Park Properties A017

Detail land to the West of Lords Way, Kingmoor Business Park

HOW Planning is instructed on behalf of Kingmoor Park Properties Limited (KPPL) to prepare representations in relation to the Preferred Options consultation. These representations support the allocation of land west of Lords Way identified on the enclosed plan for residential development. The site extends to approximately 2 ha and has the potential to accommodate in the region of 60 residential units.

The site is at the western edge of Kingmoor Park and has been marketed for 15 years. Whilst there has been good demand for other parcels of land elsewhere on the business park this particular parcel has not generated significant interest and remains vacant. As such, alternative uses for the site have been investigated by KPPL in light of current and future conditions and the site is now considered to be most suitable for residential development, based on the information presented in this letter.

The site is highly sustainable for residential development, with excellent public transport links into the regional economic centre of Carlisle. The proximity to a significant source of employment opportunities at both Kingmoor Park and Carlisle itself will also help to reduce dependency on the private vehicle for commuting for those living and working in the area. The sustainability of the site will be enhanced further with the delivery of the Crindledyke scheme, with the potential to create footpath and cycle links between the two sites and beyond.

It is noted that the Council is extremely reliant upon Greenfield land to deliver its residential housing requirement over the plan period with very few brownfield sites identified. Spatial Policy S2 is clear that the Council intends to make best use of previously developed land for new development. In accordance with this policy it is considered that the most appropriate use of the site would be for residential redevelopment.

If it were to be developed for residential use, the site could be accessed from a dedicated residential only access from the west and would not rely upon access through the employment areas to the east. This would ensure that the site would be marketable to housebuilders and future residents as well as being acceptable to the Council's highways officers, helping to ensure its deliverability within the plan period.

In terms of the relationship with the Crindledyke site, the close proximity of housing to the west means that the site would be more difficult to bring forward for employment than is currently the case. This is because of the limitations on what type of employment uses would be suitable in the context of amenity and nuisance for the adjacent homes. As stated above, this site has been marketed for 15 years without any such constraints and thus it can be assumed that the new adjacent uses will further limit the number of potential occupants. The residential development of the site is therefore more compatible with the adjacent land use at Crindledyke and would make productive use of what is currently an underused parcel of available and developable land.

The NPPF is clear that sites which are no longer suitable for employment use should be released for alternative uses as part of Local Plan reviews where appropriate. Given it is clear that the site has a limited future in its current guise, it is recommended that the Council should take a positive and proactive step of allocating the land for housing in order that it can make a significant contribution towards its forward housing supply. The relationship with the adjacent employment uses within Kingmoor Park can be easily managed through the maintenance of existing and future planting to ensure it is suitably separated from neighbouring employment premises and interfaces with the adjacent residential uses. Furthermore, we note that the existing employment uses adjacent to the site are of a benign nature and generate little noise or other nuisance that would constrain the site for residential use.

Discussions have been held with housebuilders and it is the intention of the owner to submit an application in the short term. It is entirely appropriate therefore for the site to be identified as coming forward within the Plan period.

In summary, this site represents an excellent opportunity for residential development that will relate well to the forthcoming residential development at Crindledyke on the adjacent land and would not be constrained by its proximity to existing employment uses. As such, we kindly request that Carlisle City Council include this land as a preferred option for residential development.

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20199 Site Proposal Policy: 16

051 Story Homes Ltd A010

Detail PROPOSAL TO ALLOCATE LAND AT CUMWHINTON, CARLISLE

Site Location

- The Site is currently farm land to the south of Cumwhinton School
- The Site is well related to the educational facilities within the village and other existing housing
- Cumwhinton is a sustainable village with a school, public transport links and village shop
- Access can be gained from Peter Gate

Supporting Reasons for Inclusion of Land

- The Site offers the opportunity to allow for some community gain through the provision of an opportunity to gain off road parking for the school, which currently suffers from a parking issue affecting much of Peter Gate
- Housing in this location would enable children to easily walk to school rather than having to be taken by car
- The site does not offer much in terms of visual amenity to the village. It would be seen against the backdrop of houses which have been granted planning permission at The Nook which is an adjacent site
- The Site would offer a small scale housing site which could be quickly delivered and would not require any major infrastructure preparation
- Area of strategic planting would soften the appearance of any new development
- There are no designations which would preclude the site coming forward
- Smaller sites such as these, enable the housing market to deliver a range of house types and development types
- Cumwhinton is a sustainable village which benefits from links to Carlisle and to Junction 42 of the M6

Conclusions

- The Site forms a contained extension to the village of Cumwhinton which has a range of facilities within it and good access to Carlisle and the wider motorway network
- The Site is located immediately adjacent to the village school and offers the opportunity for walking to school and also community benefits in providing space for the school to alleviate the parking issues associated with it
- The Site offers a small, readily available opportunity to realise housing, positively contributing to the delivery of the needed housing numbers in the area
- The Site is genuinely capable of development, there are no known constraints which would preclude it coming forward

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20198 Site Proposal Policy: 16

051 Story Homes Ltd A010

Detail

PROPOSAL TO ALLOCATE LAND AT GREENHILL ROAD, BRAMPTON

Site Location

- The Site is currently farmland to the south east of Brampton town centre
- The Site is well related to transport links with close proximity to the A69 roundabout offering access to Carlisle, the north east and the M6 network
- The Site would compliment the proposed allocations referenced BRAM2 and BRAM3
- The Site is within walking distance of the town's main employment opportunity at Townfoot Industrial Estate
- Access would be gained from Elmfield Road and could offer access into BRAM2

Supporting Reasons for Inclusion of Land

- The Site is noted within the Alternative Options of the housing allocations for Brampton
- The Site provides the Council with the opportunity to build upon BRAM2 and BRAM3 and provide housing with the opportunity to realise strategic open space, improved highway

links onto Elmfield Road and the opportunity for a more organic and visually improved entrance to the town which is currently provided by a hard edge of development

- The provision of substantial housing provision in Brampton will enable a greater housing choice in Carlisle District. Housing in this location would be able to provide rural benefits being close to the countryside, leisure opportunities along the nearby Hadrian's Wall and the Talkin Tarn country park all of which are nearby and support healthy lifestyle choices. In addition, it provides housing in a relatively small community providing for retention of young people within the area
- The Site is sustainable with nearby employment, retail and the town has both primary and secondary education facilities
- The Site can be adequately accessed from Elmfield Road, there are no designations or other infrastructure issues which would preclude it coming forward and providing a significant contribution to the rural housing required in the town

Conclusions

- The Site forms a logical opportunity to marry with BRAM2 providing a site which can be better laid out to the betterment of the town
- The Site is well located in relation to employment opportunities, retail and leisure and the town benefits from both primary and secondary education facilities
- The Site is genuinely capable of development and there are no known constraints which would prevent its coming forward and contributing to the new homes needed to sustain the rural town

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

20301 Objection Policy: 16

234 S Nicholson A008

Detail Support the policy as a matter of land use principle given the need to provide for housing choice and growth.
 16(4) - object to the omission for greenfield sites in sustainable locations to be considered alongside brownfield.
 Object to the part brownfield land at Newbiggin Road, Durdar (which currently detracts from the amenity of the locality), not being allocated for a mix of housing and rural diversification development provided for by policy 13.
 In terms of the merits of housing on the site, the council's response to SHLAA site reference DU03 (land at Durdar Farm) acknowledges that Durdar lies close to both Carlisle and Dalston and therefore the argument can be made that it would be a sustainable location.

 Request: 16(4) – include greenfield and brownfield sites. Allocate the land at Newbiggin Road, Durdar, for housing and rural diversification development, with the latter being supported by policy 13 and its justification text.

20338 Site Proposal Policy: 16

236 Mr & Mrs Blackwood

Detail Following our conversation with the Duty Planning Officer on Friday 4th April 2014 at the Civic Centre Carlisle we were advised to put in writing a potential land development opportunity that we would like you to consider, and welcome your advise and guidance on, so that it may be included in the Carlisle District Local Plan 2015-2030.

- The piece of land known as Yellow Quarry Wood has an approximate land area of 8.25 acres [map enclosed]
- It is situated on the west side of the M6, close to junction 42, skirting the southern side of the City of Carlisle
- It has excellent vehicle access to the A6/London Road
- All mains water, telephone and electric services run a long the side of the field

It's position can be identified on the map attached bordered by a bold line.

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20648	Objection	Policy:	16	94	
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 any of the sites will need to demonstrate that they conserve those elements that contribute to the significance of any heritage assets and their setting. 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. 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. 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. It appears that the supplementary document 'Housing Site Selection Process' does not contain the methodology used in assessing these sites so English Heritage are unable to comment on the process used in determining the suitability of these sites for development and identifying heritage assets that they may affect. It is evident that the identification of heritage assets are missing from some of the sites allocations. Further details of these are outlined in individual site comments .</p>				

20527 E2	Support	Policy:	16		BR14
188	Mrs Alison Riddell			Clerk to Brampton Parish Council	
Detail	Brampton Parish Council support development of this site rather than BRAM1.				

20526 E2	Objection	Policy:	16		BRAM1
188	Mrs Alison Riddell			Clerk to Brampton Parish Council	
Detail	<p>As stated previously in Stage 1 consultation and through SHLAA consultation the Parish Council OBJECTS to this land being used for the building of 200 houses. It is too dense for the area. There is great opposition to development of this particular site from local residents. At a recent meeting of Brampton Medical Practice, they stated that they have NEVER suggested or agreed to a surgery/health centre at this site. They are bewildered that this is incorporated in your comments to this site. As far as the Carlisle Housing Need and Demand Study goes - yes the Parish Council are aware that there is a need for further housing but this could be spread over other sites included within the Local Plan and Alternative Options under Preferred Housing Allocations such as BR14</p>				

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees>Contact	Organisation		Agent
20193	Comment	Policy:	16	BRAM1
051		Story Homes Ltd		A010
Detail	<p>Site Location</p> <ul style="list-style-type: none"> • The Site is currently farmland to the west of Brampton town centre • The Site is well related to the main employment area in the town at the Townfoot Industrial Estate with residential development to the east • The Site is well related to transport links, in close proximity to the junctions of the A69 offering access to Carlisle, the M6 and the north east of England • Access is to be gained from Carlisle Road and Elmfield <p>Supporting Reasons for Inclusion of Land</p> <ul style="list-style-type: none"> • The Site is noted as a preferred housing site within the Preferred Options Carlisle Local Plan with an approximate yield of 200 units • The Site provides the Council with an opportunity to provide a well related housing development within a town which is well served by employment opportunities, leisure, retail and education and the development would provide much needed homes in the area outside of Carlisle Urban and provide for a well planned development offering open space and a walkable neighbourhood • The Site is sustainable with employment opportunities within walking distance, it is well related to Brampton Town Centre and other facilities such as schools and retail • There are no designations which would preclude the use of the Site for housing • The Site offers the opportunity to provide an improved edge to this area of Brampton, providing a more organic and landscaped feel and improving the visual amenity when entering the town from the A69 • The Site will provide the opportunity to enable land to come forward for the provision of a new medical facility which will improve the offer within Brampton <p>Conclusions</p> <ul style="list-style-type: none"> • The site forms a logical extension to the town of Brampton offering the opportunity to provide betterment to the visual entrance of the town from the A69 by providing a well landscaped, organic form rather than the current view of regular housing lines with rear gardens • The Site is well related to employment with the Townfoot Industrial Estate within walking distance, public transport is available from Carlisle Road and there are opportunities to access the main transport network to the east and west without having to drive through Brampton town centre • The Site would deliver the opportunity to support the development of a modern medical facility within Brampton offering the wider community benefits • The Site is genuinely capable of development and there are no known constraints which would prevent its coming forward and delivering the 200 new homes which the current Preferred Option Plan requires 			
20001	Support	Policy:	16	BRAM4
198		Messrs Chance		A004
Detail	<p>In the context of the submissions made on 30th August & 13 November 2013 it is noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.</p>			

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20082	Objection	Policy:	16	BURG1
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208 Mr Robert Grayson

Detail

I am a regular visitor to my mother's home in North End Burgh-by-Sands and wish to object to this preferred option on a number of grounds:

1. Surface water flooding

The field and road immediately to the north of the Highfield residential property already suffers from flooding, any development on BURG 1 is likely to exacerbate this problem.

2. Road safety

The country lane is not wide enough adjacent to Highfield to let vehicles pass each other and an increase in traffic to and from 10 households will exacerbate this problem. Moreover the sharp angle of entry to the site from the lane, at the bottom of a slope on the lane, is hazardous.

3. Area of Outstanding Natural Beauty

Preferring a site within an AONB with the stated need for it "being developed in a sensitive manner, using the highest design standards" is likely to push prices beyond the reach of community "families and young couples" and so defeat the community's wishes. 10 units on BURG 1 will spoil rather than "conserve the landscape and scenic beauty... of the area".

4. Pressure on sewage services: Sewage pipes from North End have collapsed in the past 12 months. Additional sewage may weaken an already pressurised system.

5. Loss of light to existing properties in North End

There is a risk that properties such as 3, North End will suffer loss of light from the development of BURG 1.

6. Lack of consultation

It is inadequate that the first that North End residents adjacent to BURG 1 hear about proposals is at Preferred Option (Stage 2) and that only when a prospective home buyer learns of it via a related search. Where was any consultation about this site at an earlier stage?

It would make more sense to build outside of the AONB, without the accompanying costly design constraints, to make the development more affordable and meet the community's wishes.

Young families might be keener to be closer to the local primary school and so an extension to the Amberfield development would be more appropriate.

I understand there is also a site at Buck Bottom Farm that could be developed.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20392	Objection	Policy:	16	BURG1
245		Mr Tom Blaylock		
Detail	<p>1. Negative impact on visual amenity. The proposed site falls on the walk down to Edwards Monument the development of the proposed area would minimise the view of any person wishing to make the walk.</p> <p>2. AONB The proposed site falls within the AONB, other sites within Burgh by Sands are available (to the west), these do not fall within the AONB and would allow the area to be kept unspoilt.</p> <p>3. Drainage The drains around my house and others in the cul de sac often back up, we have had to use drainage rods on a number of occasions to stop this . Further housing could exacerbate the problem.</p> <p>4. Access The road leading to the proposed site is narrow and with vehicles outside existing premises often means it is only one car wide.</p> <p>Request: Site moved to an area outside AONB</p>			
20466 E1	Objection	Policy:	16	BURG1
258		Mr & Mrs Brian & Pamela Bishop		
Detail	<p>This site is a raised site from Sandsfield Lane, which would also mean the destruction of a fit to use building/ accommodation.</p>			

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

20147	Objection	Policy:	16	BURG1
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222	Mr Tim Grayson			
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Detail	The home of my elderly mother is situated in North End, Burgh-by-Sands, adjacent to the BURG 1 site. I wish to object to this preferred option on a number of grounds:			
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1. Area of Outstanding Natural Beauty

Referencing Policy 61, I would note the following points:

(a) The development would have a significant adverse impact on the special qualities of the AONB (note points 3 and 4 below)

(b) If considered a major development, I do not believe that exceptional circumstances have been established, nor the public interest arguments satisfied as set out in Policy 61, which would permit development of the BURG 1 site.

At least one alternative site exists within the village – for example, next to the Amberfield development – which is not in an AONB, and which would be closer to the local school and playground. 10 units on BURG 1 will spoil rather than “conserve the landscape and scenic beauty... of the area”.

2. Provision of housing for families and young couples

The summary states there is a community wish for additional houses within the village to cater for “families and young couples”. Having spoken to a number of local residents, I am unsure that this is actually the case and would suggest that evidence is provided to substantiate that statement. Assuming that the development aims to provide such housing, it is difficult to reconcile the stated need for the AONB “being developed in a sensitive manner, using the highest design standards” with the provision of affordable homes. Indeed, the cost of such a development is likely to push prices beyond the reach of “families and young couples” and so defeat the alleged community wish.

If we are to believe that provision of housing for families and young couples is a key aim of a new development, again, it would make more sense to select a site closer to the local school and playground, such as adjacent to the Amberfield development.

3. Surface water flooding

The field and road immediately to the north of the Highfield residential property already suffers from flooding. Any development on BURG 1 is likely to exacerbate this problem.

4. Road safety

The country lane leading to the BURG 1 is not wide enough adjacent to Highfield to let vehicles pass each other and an increase in traffic to and from 10 households will exacerbate this problem. Moreover the sharp angle of entry to the site from the lane, at the bottom of a slope on the lane, would be hazardous.

5. Pressure on sewage services

Sewage pipes from North End have collapsed in the past 12 months. Additional sewage would weaken an already pressurised system.

6. Loss of light to existing properties in North End

There is a risk that properties such as 3, North End will suffer loss of light from the development of BURG 1.

7. Lack of consultation

It is inadequate that the first that North End residents adjacent to BURG 1 hear about proposals is at Preferred Option (Stage 2) and that only when a prospective home buyer learns of it via a related search. Was there any consultation about this site at an earlier stage? A lack of transparency in the process is sub-optimal, as it could call into question the integrity of the process itself.

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

Further to points 1 and 2 above:

It would make more sense to build outside of the AONB, without the accompanying costly design constraints, to make the development more affordable and meet the community's alleged wishes.

Young families will be keener to be closer to the local primary school and so an extension to the Amberfield development would be more appropriate. I understand there is also a site at Buck Bottom Farm that could be developed.

20119 Objection Policy: 16 BURG1

216 Mrs Jean Grayson

Detail

HIGHWAYS ISSUES - The council published 2 photos taken in North End, Burgh, pointing out the narrowness of the road. No 2 vehicles can pass without difficulty.
 FLOOD ZONE - The field beside the site regularly floods from land drainage. Tarmac BURG1 on top of that, will increase the water. At no time during the year can a pedestrian walk along North End, Burgh, without wellingtons.

SITE - Recently the council turned down the building of a bungalow next to BURG1 because of the difficulty in seeing up and down the road. IF we are needing more houses in Burgh village, why are houses not selling in the village? Why destroy a well maintained and well built house as Highfield is?

BUILDING - If houses are to be built 'to the highest standard' they will not be affordable for 1st time buyers or young families.

SEWAGE- within the last 12 months the inner pipe in Panorama cul-de-sac for sewerage has collapsed and a new inner pipe put in place. Old sewerage pipes are all over the village. We do have a problem in Burgh with sewerage. Fortnightly a lorry comes to Burgh to remove the overflowing sewage/ 10 more houses - how much more sewage.

20386 Objection Policy: 16 BURG1

242 Mr John Kershaw

Detail

Firstly may I express my extreme disappointment that no person in North End were informed by either the City Council or the Parish Council to inform the residents of the proposed development (the facts were only available via our neighbours who are selling the property and came to light when searches were made).

The Parish Council comments that new development should respect the AONB landscape and on this site it would be extremely detrimental,

The access road from the main crossroads in the village can be a traffic hazard due to the following points:

- 1) People parking on the road constricts any already limited road width;
- 2) The roads used by various farm vehicles from tractors, heavy milk tankers and feed wagons serving several farms in the vicinity and often causes major problems and would be exacerbated by approx 50 poss more passings minimum a day.

At present the local waste treatment plant is barely able to manage the present population (indeed it requires frequent pumping out to work efficiently).

The road also floods in winter to the north of the existing property. The proposed site has always been utilised for agricultural purposes (as recently as last autumn).

There is on the proposed site a sound family bungalow and would reduce choice by demolition.

I have lived in North End for considerable time and use the field to cross via our gate in the house for walking in the AONB and will take legal opinion with regard to right of access for the future.

Suggest: There is at the present time for sale a site known previously as Buckbottom Farm on the main road in the village which is an eyesore and many outbuildings in a state of disrepair (it is advertised as ready for re-development) and would be an ideal site for new housing - close to the village school and all the village amenities.

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

20205	Objection	Policy:	16	BURG1
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227	Mr Michael Edwards			
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Detail

It was a complete surprise to learn that the bungalow Highfield and agricultural land to the rear had been offered up for housing development. The key point is that the demolition of Highfield together with the erection of 10 houses would be a clear example of where low density development on the fringe of the village would be materially detrimental to the character and appearance of this part of the village. This is contrary to Policies which require new development to respect local distinctiveness and landscape character and to respond to local context. North End is a quiet rural lane leading off the main village street with a developed frontage on both sides for about 500 metres. Highfield is a bungalow at the end of the developed area built on an elevated site and set back about 15 metres from the road. To the front is a roadside hedge which continues to the north and then becomes a field boundary. The overall pattern of development in Burgh is eclectic but our argument is that in this particular part of Burgh the pattern is clear. Whilst there are two cul de sac developments already off North some may argue that this proposal would merely mirror these cul de sacs. This fails to appreciate the location of the proposed site.

It offers a transitional zone from the centre of the village to open countryside beyond helped by the presence of mature gardens and hedges. We would like to see this character retained rather than have an abrupt change from countryside to dense townscape. North End is a narrow lane with limited street lighting and an absence of pavements; it is regularly used by local people for walking and to exercise dogs; it also provides access to the Edward I monument on Burgh marsh and its low density character acts as transition between the open countryside and the coast to the north and the heart of the village to the south and forms part of the Hadrian's Wall Cycle Way.

An appreciation of the peace and tranquillity of Burgh and its village character / size/ appearance were all referred to in the Community Led Plan published in October 2013. It is difficult for a non-planning person to put down on paper what the meaning of local distinctiveness and landscape character but in his book "Waking Through Eden" in a chapter on The Solway Firth, the author, Neil Hanson describes walking up North End after a visit to the Edward I monument he explains "At the top of the hill as I entered the village of Burgh by Sands I passed a monument to English power and might on the threshold of the twenty first century – a bungalow. Eden has spent a thousand years and more at the eye of great events; perhaps has earned its quiet retirement at the margins of English Life. After centuries of bloodshed and destruction in Eden, who would not prefer bungalow bliss in this earthly paradise"? That bungalow was Highfield.

Carlisle City Council were faced with the similar decision in 2011 with application (10/0736) when despite photographs and videos they needed a site visit to appreciate the character of the area – they came to a unanimous decision that that particular proposal would have a detrimental impact on the character of the area. This view was echoed in an Appeal Ref APP/E0915/A/11/2162046 where the Inspector recognised "the benefits of an additional small dwelling within the village. However these considerations do not outweigh the harm I have identified in relation to the impact on the village character and appearance".

For all these reasons we ask that this Policy/Site Application BURG1 be rejected.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20108	Objection	Policy: 16		CA50
006	Messrs G & CE Edminson			A023
Detail	<p>This site should be included within the Housing Land Allocations rather than an alternative for the Local Plan because: There are two potential access points to this site (shown roughly on the attached plan), both of which could reach J44. These accesses would not lead to a rat-running potential from the Storey Homes site because the distances would be greater going through this site to J44. It would on the other hand improve permeability for both sites. The school issue mentioned in the Council document has been overcome, by ensuring that this site would meet its own school requirements or increase the size of a neighbouring school. It is understood that Cumbria Highways is preparing a traffic Impact Assessment based on a model which includes all the possible SHLAA sites. Until this modelling exercise is complete, the prima facie evidence, of two potential accesses to J44, would suggest that this site would perform much better than other sites with only one access to J44 in terms of traffic impact.</p> <p>Our client wishes for this site to be included in the Local Plan allocated for housing, and that we consider that the Plan is unsound without its inclusion. I confirm that this site is available for immediate development.</p>			
20266	Objection	Policy: 16	293	CA68
230		Edwin Thompson		A018
Detail	<p>The site known as Deer Park CA68 (page 293) should be allocated for residential purposes. The site is identified as being appropriate for either residential or employment purposes in the current Development Plan ie the Carlisle District Local Plan 2001-2016.</p> <p>The Inspector who dealt with objections to the Revised Redeposit Local Plan in April 2008 considered that the site was a sustainable location and supported the allocation.</p> <p>The site is discussed in the Strategic Housing Land Availability Assessment for the Belah Ward where it was considered to be deliverable.</p> <p>The Local Plan says that "... there has been no interest shown in developing the site apart from an informal enquiry in 2010 which has not been followed up. The landowner has not engaged in the Local Plan consultation process to promote the inclusion of the site for housing. As such it cannot be considered available for development."</p> <p>The reference to there being no interest in developing the site is wrong. Detailed discussions were undertaken by a National housing building company in 2007 who intended to submit a detailed planning application. It was only the changed National economic circumstances that led to that interest not being following through.</p> <p>The site is being actively marketed by Chartered Surveyors on behalf of the owners (please see accompanying particulars). There is active interest from National housing building companies.</p> <p>There is every expectation that the SHLAA's conclusion, that the site is deliverable, is correct.</p> <p>The objection could be resolved by allocating the site for housing under the terms of Policy 16.</p>			

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

20195	Comment	Policy:	16	CARL1
051				A010

Detail

Site Location

- The Site is currently farmland to the north of Carlisle City Centre
- The Site is well related to transport links, in close proximity to the M6, Junction 44 and the Kingstown Road/Scotland Road to Carlisle City Centre
- Existing retail and employment development to the west, residential partially to the west and to the south of the site
- Access to be gained from Kingstown Road
- Land is designated under the previous Carlisle District Local Plan 2001-16 as Urban Fringe

Supporting Reasons for Inclusion of Land

- The Site is noted as a preferred housing site within the Preferred Options Carlisle Local Plan with an approximate yield of 217 units
- The Site provides the Council with the opportunity to provide a well related housing development to the urban area of Carlisle and help to realise the proposed target of 665 completions per year in the urban area
- The Site is sustainable with nearby employment, retail and schools all within walking distance, regular public transport is available along Kingstown Road
- There are no nature designations which would preclude the Site coming forward
- Areas of planting and a well designed scheme offer the opportunity to provide an attractive and welcoming entrance to the City from the M6

Conclusions

- The Site forms a logical extension of Carlisle Urban area towards the physical barrier of the M6 whilst retaining a sufficient area of separation to ensure noise etc is not a issue
- The Site is well related to employment, retail opportunities, public transport and education
- The Site is genuinely capable of development and there are no known constraints which would prevent its coming forward and delivering the numbers needed to support housing in Carlisle

20400 Eo	Objection	Policy:	16	CARL10
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166/41 Mrs Yvonne Maynard

Detail

1. Volumes of traffic on Windsor Way and the exit onto Kingstown Rd is not for additional housing. Numerous houses that back onto Windsor Way (Abbotsford Drive/Jaysmith Close) have insufficient parking so park at their rear on Windsor Way making the road single lane traffic often on the wrong side of the road, the updated plan implies the addition of a bus route - this will prove dangerous and the junction out onto Kingstown Rd is too sharp for buses/large vehicles
2. Additional housing will require extra schools as Stanwix and Kingmoor are already full. If this was to go ahead why was Belah school demolished? You would need to rebuild a new school else where - in making the decision to remove Belah school you must have reports on reduced traffic etc why reinstate this?
3. Drainage - the updated plan concentrates of the gosling beck and issues at the Pennington drive end at the back of Morrisons - has anyone looked at the beck when there has been high rainfall at the back of our property 28 Wolsty Close? The beck rises to fence level - what guarantee do you propose to put in place to ensure no further water ingress onto our property if additional housing is built?
4. Clay in field - the whole fields have poor drainage due to the clay content *****You have built bypass - use it and regenerate the areas near this to provide better transport links an leave the centre as it is with small green belt areas and wildlife

Do not build on this site

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

20440 E1	Objection	Policy:	16	CARL10
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253 Mrs Louise Holmes

Detail

This land lies behind our house. It is currently farmed. The proposals do not give me confidence that the following have been considered in detail:

1. access and transport
2. safety of children playing with increased traffic
3. schooling
4. drainage. The land is extremely wet. Has our council not learned lessons from recent floods down south? We need farm land to absorb water. Our gardens are already taking water from the fields
5. roman road - we are led to believe a roman road runs close by. Has this been considered fully?
6. green sites, trees, hedgerows. These should remain. Indeed our land border is a hedgerow as the fence lies within our garden. hedgerows offer a great wind break, as recently discovered during periods of high wind
7. need to use up Brownfield sites first
8. generally, who is moving to Carlisle in such huge numbers? The city centre is in decline and there appears to be very little reason for such net inflow to the city WE HAVE HEARD FROM THE TENANT FARMER THAT THE LAND IN QUESTION HAS ALREADY BEEN SOLD TO THE DEVELOPER. IF SO THIS MAKES A MOCKERY OF THE CONSULTATION.

You need to build on brownfield sites rather than having the city radiating out with messy brownfield areas in the middle. There are insufficient facilities in Carlisle now for the people who do live here so why do you think people would want to move to the area? We have very few restaurants, poor shopping so people go elsewhere such as Newcastle and Glasgow as our town centre is rapidly shrinking and few other leisure facilities of a good standard such as theatre, cinema, swimming pool. Who is going to employ all of these new people as there are residents now who can't get jobs.

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

20435 Eo Objection Policy: 16 CARL10

134/6 Mr Nigel Holmes

Detail This land lies behind our house. It is currently farmed. The proposals do not give me confidence that the following have been considered in detail:

1. access and transport
2. safety of children playing with increased traffic
3. schooling
4. drainage. The land is extremely wet. Has our council not learned lessons from recent floods down south? We need farm land to absorb water. Our gardens are already taking water from the fields
5. roman road - we are led to believe a roman road runs close by. Has this been considered fully?
6. green sites, trees, hedgerows. These should remain. Indeed our land border is a hedgerow as the fence lies within our garden. Hedgerows offer a great wind break, as recently discovered during periods of high wind
7. need to use up Brownfield sites first
8. generally, who is moving to Carlisle in such huge numbers? The city centre is in decline and there appears to be very little reason for such net inflow to the city

Suggest: build on brownfield and build as and when demand is there not merely in anticipation of such demand; provide the infrastructure then the people come. The consultation reminds me of "cart before the horse" mentality

copy of letter sent to Persimmon dated 27 April 2014 attached to representation.

20290 Objection Policy: 16 CARL10

233 Mr Keith Ormiston A009

Detail My client objects to the exclusion of their land, which is located adjacent to Shortdale Cottage, Tarraby, as an extension to the proposed housing allocation CARL10. My client's land, which is identified in red on the attached plan, is available to be developed and forms a logical amendment/extension to the aforementioned allocation. There are no specific landscape features that would preclude its inclusion as part of the proposed housing allocation.

Request: The inclusion of our client's land as an extension to housing allocation CARL10.

20033 Objection Policy: 16 CARL14

094 Cllr Betton

Detail Regarding Beverly rise green fields preferred development, not many people will know the green fields behind their houses are a preferred option for new build development. Further concern with Beverly Rise is disruption to constituents, privacy and distance of proposed new housing to the near busy M6 and planning regulations around that area. The only shops available in the area are at Central Avenue and residents tell me they would prefer shops closer to home, many of these residents are elderly people. It would be good to see encouragement of shops nearer to this half of the area as yet there are none mentioned, this would be beneficial if expansion happened!.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20026	Support	Policy: 16		CARL15
021		Harrison Northern Ltd		A004
Detail	In the context of the submissions made on 28th August & 18th November 2013 (copies attached) it is to be noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future. [Land off Tree Road, Chertsey Mount, Carlisle]			
20025	Support	Policy: 16		CARL18
021		Harrison Northern Ltd		A004
Detail	In the context of the submissions made on 22nd August & 18th November 2013 (copies attached) it is to be noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future. [Land to the rear of Hilltop Hotel, London Road, Carlisle]			
20576	Objection	Policy: 16		CARL19
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	This is in Wetheral Parish not Botcherby. Concerns with access from the Durranhill road, suggest a roundabout at the Rosehill junction which leads to the estate with spurs off as potential development from the new Persimmon estate?			
20032	Objection	Policy: 16		CARL19
094	Cllr Betton			
Detail	The Green field Land off Durranhill Road Botcherby is an inappropriate location for new build. There are health and safety problems regarding the highway. The one existing path along Durranhill Rd to Montgomery Way is of inadequate size and can not accommodate mothers with prams or disabled people buggies. The highway is a narrow country lane, not intended for heavy traffic, it is too small, a bus and a car can not pass safely and pavements are mounted by heavier vehicles risking safety of pedestrians. There is also a problem with speeding vehicles connected to the first phase development of Barley Edge which I expressed last year when the planning application was approved. Encouraging of more homes to this area will make problems worse than they are now, particularly as existing problems mentioned and more are not being addressed. The biggest concern is road accidents here.			

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

20314	Objection	Policy:	16	CARL5
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235				Carleton Farm Development Action
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Detail

Carleton Farm Development Action Group welcomes the opportunity to comment on the Carlisle District Local Plan 2015-2030 (Preferred Options Stage 2). The Action Group is made up of residents from Farbrow Road, High Green Croft and Carleton Village.

We wish to OBJECT to the proposed Site Allocation CARL 5: Land between Carleton Road and Cumwhinton Road, Harraby; for the following reasons (references are to Policies set out in the current adopted Carlisle District Local Plan 2001-2016):

Housing Supply and Viability: It is understood that there is no direct need for this proposed Site Allocation given that the 5 year supply target has been met. According to the Carlisle and District Local Plan 2001-2016, surplus land on the former Garlands Hospital site has been redeveloped for housing in recent years, but that some land remains surplus to requirements.

Housing Location: The Site Allocation Land is not listed in Policy H16 as a residential allocation for the urban/rural area of Carlisle District. The proposed site is situated behind an existing housing development and any proposal is likely to lead to significant loss of residential amenity to surrounding properties and would be in conflict with Policy H9.

Housing development on this site would lead to the loss of the identity of Carleton Village. The land of the proposed Site Allocation currently acts as an effective delineation feature marking the boundary of Carleton Village from the Carlisle Urban District area. The village identity would be lost as the two areas merge, divided only by Sewells Lonning. This could act as a catalyst for further housing development proposals in the limited Greenfield sites which would remain.

Housing Density: We wish to highlight that the Indicative Yield of housing (No.204) is considered inappropriate when compared to proposals for residential development in similar rural areas and is in conflict with the recommendations set out in Policy H3.

Design and Appearance: In conflict with Policies H1, CP5, CP6 and LE1, housing development on this site is likely to:

- intrude into open countryside;
- adversely affect the residential amenity of neighbouring property and be visually intrusive;
- lead to the loss of amenity open space.

Recreational Space: A housing proposal on a site of this size and the likely number of 204 units would need to make provision for children's play and recreation areas. In accordance with Policy LC4, new family housing developments of 40 or more dwellings will be required to include outdoor playgrounds and informal play space. Furthermore developments of 5 hectares or over, should provide 0.1 hectares of sports ground development per hectare.

Flooding and Drainage: The area of the proposed Site Allocation is known to develop localised flooding at the junction of Cumwhinton Road and Sewells Lonning. Housing development on this site would only worsen the situation and increase surface water run off depending on the nature of drainage proposals.

Pollution: Housing on this proposed site will introduce additional traffic within the area and inevitably lead to a deterioration in air quality and an increase in noise levels. Policy CP13 makes reference to not permitting development where development would generate significant levels of pollution, which cannot be satisfactorily mitigated within the development proposal. Street lighting would inevitably be required for housing on this site and likely lead to light pollution for nearby properties.

Transport and Accessibility: The mini-roundabout located at the junction of Cumwhinton Road and the Garlands Road is known to be a location of regular vehicle collisions. Housing development on the proposed site would increase traffic flows in this area. The current layout of the miniroundabout at the junction of Cumwhinton Road and the Garlands Road may not be suitable to meet the increased capacity of increased daily vehicle movements associated with housing development on this proposed Site Allocation.

Environmental Impact Assessment: We request that any housing development on this proposed Site is Screened to determine whether it is considered to be EIA development in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Following European Court Judgement (Goodman and another v Lewisham London Borough Council [TLR 21/2/03]), housing development now forms part of EIA Schedule 2 development, Section 10(b) Infrastructure Projects and housing development proposals should be Screened, as appropriate.

Planning applications for housing development should not be considered in isolation, if in reality it is properly regarded as 'an integral part of a more substantial development', i.e., the submission of multiple planning applications and appropriate cumulative impacts are considered. The objective of the EIA Regulations could be defeated if Developers submit multiple applications for 'piecemeal' development (reference European Case-Law, R v Swale BC exp RSPB (1991) and Circular 2/99 para 46,

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

Mr Justice Brown). This proposed Site Allocation is effectively three separate fields and a developer could submit applications in a 'piecemeal' fashion, potentially defeating the objective of the EIA Regulations.

Statement of Community Involvement: A housing development on this site of 10 or more units would be considered 'Major Development' in accordance with The Town and Country Planning (Development Management Procedure) (England) Order 2010 .We believe that a Statement of Community Involvement should be submitted with any planning application for development on this site. We understand this is not a mandatory requirement and considered best practice, however consultation with the local community is essential given the potential impacts of a housing development upon the local residents.

Request: Removal of Site Allocation CARL 5: Land between Carleton Road and Cumwhinton Road, Harraby.

20002	Support	Policy:	16	CARL6
198				A004
Detail	In the context of the submissions made on 30th august & 13 November 2013 it is noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.			
20598	Comment	Policy:	16	CARL6
196	Mrs S Tarrant			Clerk to Cummersdale Parish Coun
Detail	169 Homes			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20194	Comment	Policy:	16	CARL6
051		Story Homes Ltd		A010
Detail	<p>Site Location</p> <ul style="list-style-type: none"> • The Site is currently farmland to the west of Carlisle City Centre • The Site is well related to transport links in close proximity to the Wigton Road junction of the CNDR offering access to Junction 44 of the M6 and to West Cumbria • There are sites with planning consent for employment and a local food store within walking distance of the site • The adjacent site is currently undergoing development as a residential site by Persimmon Homes • Access is to be gained from Wigton Road <p>Supporting Reasons for Inclusion of Land</p> <ul style="list-style-type: none"> • The site is noted as a preferred housing site within the Preferred Options Carlisle Local Plan • The Site provides the Council with the opportunity to continue to build upon the Morton expansion, a planned expansion of Carlisle adjacent to existing housing and nearby secondary and primary schools • The Site will positively contribute towards to proposed target of 465 completions per year in the urban area • The Site provides the opportunity to enable a better designed edge and entrance to the City • The foot/cycleway along the CNDR is easily accessed from this site providing a real alternative to the private car for a cycle opportunity to the strategic employment site at Kingmoor Park • There are no designations which would preclude the land coming forward <p>Conclusions</p> <ul style="list-style-type: none"> • The Site forms a logical continuance of the housing to be released as part of the Morton Masterplan forming an extension of the Carlisle Urban Area to the physical barrier created by the CNDR • The Site is well related to employment, retail opportunities, public transport and education • The Site is genuinely capable of development and there are no known constraints which would prevent its coming forward and the delivering the numbers needed to support housing in Carlisle 			
20326	Comment	Policy:	16	CARL6
062		Church Commissioners for England		A013
Detail	<p>This site has an indicative yield of 169 units and there is no delivery timescale mentioned within the document or the accompanying 'Housing Site Selection Process' document.</p>			

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20196	Comment	Policy: 16		CARL7
051		Story Homes Ltd		A010

Detail

Site Location

- The Site is currently farmland to the west of Carlisle City Centre
- The Site is well related to transport links to the wider area via the CNDR, giving access to the M6 and the west of Cumbria, and Orton Road providing access to Carlisle City Centre
- There is existing residential development to the north-east of the site
- The Site is within walking distance of the proposed neighbourhood retail store and employment site at the Morton Development
- Access is to be gained from Orton Road
- Land is designated under the previous Carlisle District Local plan 2001-16 as Urban Fringe

Supporting Reasons for Inclusion of Land

- The Site is noted as a preferred housing site within the Preferred Options Carlisle Local Plan Review with as part of a larger allocation
- The Site is sustainable either as part of a larger allocation or by itself as a stand alone development
- The Site provides the Council with the opportunity to provide a well related housing development to the urban area of Carlisle with a positive impact on the delivery of the proposed target of 465 urban completions per year
- The site is well related to existing residential areas with local shops and schools in addition to providing quick access into the surrounding countryside offering leisure opportunities
- There are no designations which would preclude the Site coming forward

Conclusions

- The Site forms a logical extension to the City of Carlisle towards the physical barrier of the overhead power lines and the CNDR
- The Site is well related to employment, local retail, public transport, community (at the nearby St Edmund's Church) and education facilities
- The Site is genuinely capable of development and there are no known constraints which would prevent its coming forward and contributing to the delivery of the numbers needed to meet the Housing Need in Carlisle

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20327 Comment Policy: 16 CARL7

062 Church Commissioners for England A013

Detail

This site has an indicative yield of 509 units and the 'Housing Site Selection Process' document states that "the landowner has indicated that a realistic timescale for development will be years 6-10 of the Local Plan period". As such, it is assumed that the likely delivery of this site will fall within the period 2020- 2025. The comments from the Highways Authority are also noted in respect of the requirement for two access roads being required from Orton Road, as well as a main distributor road to serve the future housing estate and general improvements to Orton Road itself.

These two sites are both located in close proximity to the Commissioners' site on the southern edge of Carlisle. While the Commissioners are broadly supportive of development in the south of Carlisle, it is vital that this area is not overdeveloped as this could threaten the deliverability of sites in this location that already benefit from an existing implemented planning permission. As such, it is vital that development of the scale proposed in this location is phased in an appropriate manner in order to ensure that the various sites come forward to the market in a planned manner, rather than all at once.

In respect of the South Morton site itself, while development commenced in October 2013, the housing element of the site (namely 825 houses) has yet to be brought forward, due to the current economic climate. As such, the marketability of the quantum of residential development proposed across the plan period in Carlisle South should be given further consideration, particularly in respect to the National Planning Policy Framework (NPPF, March 2012) which states at paragraph 158 that – "Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals". As such, we consider that the potential marketability, which is central to the deliverability of any site, should be given further consideration in respect of the proposed developments set out on the southern edge of Carlisle.

In addition to the future housing development at South Morton, there are a number of other elements of the South Morton Masterplan that are yet to come forward, namely:

- Circa 40,000 sq. M. Of employment land (as per Policy 1 of this plan); and,
- Development of a foodstore of approximately 8175 sq. M., with potential to introduce a wider range of comparison retail and service uses as part of the Morton District Centre (as per Policy 8 of this plan).

Traffic impact in respect of the South Morton site was considered as part of applications 12/0692 and 13/0207, in particular with respect to the potential need for a roundabout at the Dalston Road/Peter Lane junction that was requested by Cummersdale Parish Council. As part of these applications, it was confirmed that a roundabout at this junction was considered previously when processing their original outline application and not deemed to be necessary. In addition, it was confirmed that this issue could not be revisited as part of future reserved matters applications for the South Morton site.

However, the residential developments proposed within the next plan period will inevitably result in an increase in traffic levels on the southern edge of the City. Through the submission of various reserved matters applications in respect of the South Morton site over the last 12 months, we are aware of the views of local residents (as referenced in the previous paragraph) that traffic levels have increased in the Cummersdale area since the CNDR has come into operation. As such, the careful phasing of these sites should be considered in order that the relevant infrastructure is in place to cope with the anticipated increase in traffic levels across the plan period.

20599 Comment Policy: 16 CARL7

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail 509 homes- this development should not be built without the infrastructure and new primary and secondary education establishments in this locality.

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Consultee Ref No	Consultees.Contact	Organisation		Agent
20036	Objection	Policy: 16		CARL7
205	Mrs Kathleen Messenger			
Detail	I'm objecting to this plan. I live in 9 Bungalow and am going to be blocked and overlooked by these houses if they decide to build town houses or houses. This field behind me is usually sown with barley and it used to be silaged 2 or 3 times a year. Also it could possibly devalue my property of I did decide to sell.			
20016	Support	Policy: 16		CARL8
026	Client of Taylor & Hardy		Ref: MEH/JJ/C12/129 - Border Travel	A004
Detail	In the context of the submissions made on 30th August & 12th November 2013 (copies attached) it is to be noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.			
20601	Support	Policy: 16		CUD03
196	Mrs S Tarrant		Clerk to Cummersdale Parish Coun	
Detail	Agree with the comment made.			
20602	Support	Policy: 16		CUD04
196	Mrs S Tarrant		Clerk to Cummersdale Parish Coun	
Detail	Agree with the comment made- that the scale of the development indicated would be an unacceptable intrusion on to the country side.			
20600	Support	Policy: 16		CUMM1
196	Mrs S Tarrant		Clerk to Cummersdale Parish Coun	
Detail	14 homes- support the small scale development but must be in keeping with the village.			
20015	Support	Policy: 16		CUMM1
200	Mr David Story			A004
Detail	In the context of the submissions made on 18 November 2013 (copy attached) it is noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.			
20013	Support	Policy: 16		CUMW1
025	Client of Taylor & Hardy		Ref: MEH/JJ/C13/052 - Messrs Graha	A004
Detail	In the context of the submissions made on 30th August & 12 November 2013 (copies attached) it is noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.			

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20577	Objection	Policy:	16	CUMW1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Concerns regarding surface drainage, flowing across the B6263 to overloaded gullies. An attenuation tank would be required. Consideration to be given to "ribbon" development on the opposite side of the B6263 to balance the housing. The chapel could be demolished to improve the access to the site			

20612	Objection	Policy:	16	CUMW2
272	Mrs Wendy Daley			
Detail	<p>Building houses on this piece of land will cause increased flooding of houses currently in the village and will flood the new houses being built. I object to the piece of land at Cumwhinton on the B6263 marked Hall/ War Meml being allocated as land for residential development, and also to the fact that the map of Cumwhinton does not show areas of surface water flooding. The houses in this area are under threat of flooding every time there is heavy rain. Myself and neighbours struggle to keep water out of our houses during heavy downpours as the current Highways drainage system gets quickly inundated and the water floods down the road and over verges, and then up household drains. This happens at least once a year. We have had to call the fire brigade out at least five times in the time I have been living here (7 years). In 2002 work was carried out by the City Council to alleviated some of this problem by boring holes into the field wall to allow flood water to be able to flow off the road into this very area of land that has been allocated for residential development! The drains in this area of allocated land also bubble up and create a stream though the whole of the field. Building houses here with the current state of the Highways drainage system appears very foolhardy, it would increase the problem of flooding for current houses and problems for the new houses being built.</p> <p>The Highways drainage system needs to surveyed for the village and brought up to date to cope properly with new housing developments and any new development on this land must have strict planning conditions to ensure that the flooding problems are not exacerbated for the current houses that are in the area.</p> <p>For reference we have also have a copy of report written by the City Council in 2002/03 on the problems written by Alistair McLellan and entitled Cumwhinton Summer 2002 Flooding Report which was prepared in November 2002 and updated in February 2003. We have also been in contact with Helen Renyard Drainage and Surface Water Officer for the County Council on this.</p>			

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Consultee Ref No	Consultees>Contact	Organisation		Agent
20126	Support	Policy: 16		CUMW2
218	Executors of Mrs M Coulson			A013
Detail	<p>We fully support the identification of site CUMW 2 (Land north of the B6263 at St John's Hall) for the future allocation for development of up to 20 residential units. Cumwhinton is an attractive rural village located approximately 3.5km south east of Carlisle and 2km from the larger village of Wetheral. The settlement is considered wholly capable of accommodating future growth that will support existing services in the village and other neighbouring settlements and rural communities. Existing services and facilities within the village include a primary school, village hall, post office, church and public house. The settlement has good public transport services and is located on the B6263, which connects the village with Carlisle and junction 42 of the M6 motorway, located approximately 1km west.</p> <p>The site is located in the heart of the village and high quality new development will continue the existing frontage along the B6263. It is well contained in the centre of the village by existing residential development to the south, east and west. It is considered that residential development of the site will help to 'boost significantly the supply of housing' within the area in a sustainable location, in addition to supporting existing services and facilities within the village (which includes a primary school, public house, village hall, small post office and shop and regular bus service to Carlisle) and neighbouring settlements.</p> <p>Furthermore, paragraph 55 of the NPPF seeks to promote housing development in rural areas where it will enhance and maintain the vitality of rural communities. It goes on to give an example of how one village may support and sustain the services in a village nearby. Situated in close proximity to the villages of Wetheral, Great Coreby and Cotehill, development in Cumwhinton will support the services in all these settlements in addition to relieving housing pressures in Carlisle.</p>			
20578	Objection	Policy: 16		CUMW2
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Concerns regarding drainage, members would prefer to see a smaller housing development on this site with additional houses being built on other available land e.g. land adjacent to Holme Meadow.</p>			
20579	Comment	Policy: 16		CUMW3
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Already approved</p>			

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20273	Objection	Policy: 16		HARK1
106			North Associates	A018

Detail

The allocation of site HARK1 Kingmoor Park Harker Estate for some 300 units is objected to. The merits of the Harker site were considered by the Inspector who held a Public Local Inquiry into objections to the Revised Redeposit Local Plan 2001-2106. In his report of April 2008 he said "... Harker is, without doubt, located in open countryside away from any sustainable settlement and is not sufficiently large to form a new sustainable settlement in its own right. If there was not an existing use and buildings on the site it would not be considered a suitable location for development. It has relatively poor access to the main road network, to public transport, and to local services such as schools and shops. It is, in my view, prominently located in the landscape with little natural screening to the south and west. The suggestion that replacing the existing buildings with a development of between 100-200 houses would improve the visual quality of the landscape was not a convincing argument."

Furthermore, at para. 5.162 the Inspector said:

"Attempts to locate the site within the settlement of Harker were not convincing. There is little of substance to the settlement in any event, and the main cluster of dwellings lies on the eastern side of the A7 at Harker Park. In all other directions, including towards the site itself, the development is best described in Mr. Fawcett's words as 'discontinuous'. The reality is that there is little there apart from a few isolated houses, and it is accepted that the location would be a strange one to promote for housing if there were no existing buildings. Although PPS3 no longer advocates the 'sequential approach' to site selection, it is difficult to see a development with upwards of 100 houses as being compliant with advice that it should be well integrated with and complement the local area. Nor do I see it following advice that the location for housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services (PP3 para.38)."

The Inspector's criticism of the development of this site for residential purposes apply to the present day circumstances as well. The reality is that the site is in an unsustainable location. Significantly that was the Council's position at the Preferred Consultation stage.

The NPPF is clear, that in order "... To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities." In this case there is no real community to enhance or maintain. Indeed, there is an opportunity cost dimension in the sense that locating 300 houses close to other settlements (e.g. Longtown or Dalston) would facilitate the enhancement and maintenance of services within those settlements.

The site known as HARK1 should be deleted from the housing allocations in Policy 16. It should be replaced by a Primary Employment Land designation (Policy 2),

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20208	Support	Policy: 16		HARK1
103			Kingmoor Park Properties	A017

Detail

The representations fully support the proposed allocation of land at Harker Industrial Estate, Lower Harker (Hark1) as identified in Policy 16 – Housing Strategy and Delivery. The site extends to 10.7 ha and has the potential to accommodate in the region of 300 residential units.

Background

KPPL has supported the principle of redeveloping the site for housing for a number of years, faced with the ongoing decline of the condition of the buildings and the excellent availability of far superior employment sites nearby which are more than capable of meeting forecast demand. The majority of buildings at Harker are no longer fit for purpose, with many sealed off for health and safety reasons and there has been a gradual decline in the number of occupiers in recent years. This decline is extremely likely to continue given the high cost of maintenance and the low returns generated. The site contributes virtually nothing to the economy of Carlisle and employs only a limited number of people. Essentially the status quo cannot continue.

As detailed above and in the Council’s own Employment Land Review (ELR) it is clear that there are limited future employment prospects for this particular site and as such the residential allocation is welcomed; indeed the site was ranked 48th of 54 in the ELR in terms of quality and was recommended to best be used for an alternative use.

An Excellent Redevelopment Opportunity

KPPL has previously submitted comprehensive representations in the form of a Development Statement which demonstrates how the site can be delivered for up to 300 residential units, incorporating areas of public open space and landscaping.

A series of technical studies have been undertaken in order to establish the ability to redevelop the site for residential purposes, these have included:

- Ecology;
- Flood risk;
- Access and Transportation;
- Landscaping; and
- Ground investigation

It is clear from the results of these investigations that the site is demonstrably deliverable for residential development and that there are no insurmountable reasons development cannot come forward in the short term. An illustrative masterplan has already been prepared to reflect the findings of the above assessments. In accordance with the NPPF the site is suitable, available, achievable and viable.

Discussions have been held with several national housebuilders which has generated interest and it is the intention of the owner to submit an application in the short term. It is entirely appropriate therefore for the site to be identified as coming forward within years 0-10 of the Plan period.

Policies

Policy 16 – Housing Strategy and Delivery

The identification of Site Hark1 at Harker Estate, Low Harker for residential development under Policy 16 is fully supported by KPPL. As detailed above the site has poor employment prospects going forward and would be better suited for residential development.

Policy 19 – Affordable Housing

KPPL supports the allowance for a viability assessment to be submitted to justify lower levels of affordable housing in instances where the delivery of the full policy requirement would make the scheme unviable.

Policy 36 – Planning Obligations

In a similar vein to the Affordable Housing policy, it is important that contributions are not excessive. The NPPF is clear that the developer should expect a reasonable return and viability must not be compromised. The allowance within the policy which confirms the need for viability and reasonableness tests to be used is therefore supported.

Summary

The proposed allocation of land at Harker Industrial Estate is welcomed by the site owners, KPPL. The site is no longer suitable for employment uses, a view supported by

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the Council's own ELR, and as such it is entirely appropriate and in keeping with the NPPF for the land to be released for an alternative use. A number of comprehensive technical studies have been undertaken in order to understand if the site can be redeveloped for residential use. These results demonstrate equivocally that it can be. The land is one of only a handful of previously developed sites proposed for a residential allocation, and will make a valuable contribution to Carlisle's future supply of housing. House builders have expressed a firm interest in the site and there is every likelihood that it will be delivered promptly; indeed an outline application is currently being prepared following pre-application discussions with officers.

20269	Objection	Policy: 16	274	HO03
231				North Associates & Cumbria Constabulary

Detail Hadrian's Camp comprises a substantial area of previously developed land partly vacant and partly occupied by the Cumbria Constabulary Transport Depot. The site is properly regarded as previously developed which the NPPF seeks to encourage the use of. The site's planning history shows the suitability of the location for housing purposes including the most recent application which the Council have approved. The site has the potential to provide a mixture of uses including employment, leisure, residential and possibly educational development in a location close to the village centre of Houghton with its facilities accessible by foot and on a strategic location close to the Hadrian's Wall trail and within easy reach of the City centre and all its facilities. National Planning policy encourages mixed uses. Houghton is clearly a significant settlement with a range of services and facilities. The intention to provide no further allocations is misguided. Further allocations are needed. The parcel of land identified in the Local Plan as HO03 (page 274) should be included in the Local Plan as a mixed use opportunity site in order to maximise its potential. It is noteworthy that the SHLAA (same reference HO03) regards the site as deliverable. There is interest in the site from local Housebuilding firms.

- The development of the suggested site for residential and other purposes:
- complies with the thrust of the policy objectives contained within the National Planning Policy Framework;
 - is unlikely to raise any significant highway related issues;
 - is physically well related to the built up area;
 - could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties; and
 - will have limited visual impact upon the wider landscape being well contained by existing buildings and landscape material.

Taking into account the above points the allocation of the land for housing in the Local Plan 2015-2030 would be wholly appropriate and give flexibility. Whilst it is noted that the site is covered by a Local County Wildlife Designation the survey work underpinning that designation took place a long time ago. The recent planning permission shows that appropriate mitigation can be successful in facilitating development whilst maintaining the appropriate protection of biodiversity interest.

The site should be identified as appropriate for a mixture of uses including residential under the terms of policy 3 or alternatively allocated for residential under the terms of policy 16.

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20544	Objection	Policy: 16		LINS1
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>The Parish Council is concerned that this 1.28ha site is included in the LP. The site was identified in the Strategic Housing Land Availability Assessment (SHLAA) as Site Ref: OC30 North Stile Farm and, although scheduled as deliverable, was not considered developable the SHLAA commenting that it was: "Not yet established whether Linstock will be allowed growth in the Local Plan. Future policy may rule this site out. Scale of acceptable development in village will be limited."</p> <p>Although Linstock has a green and a Women's Institute Hall there are no local services such as school, shop/post office, church, pub or regular bus service; meaning that the site cannot possibly be considered as a sustainable location; it also lacks direct access from the highway, being enclosed by privately owned land.</p> <p>For these reasons the Parish Council opposes the inclusion of the site at, as one allocated for housing, and requests that it be withdrawn.</p>			
20272	Objection	Policy: 16		LO 02
106		North Associates		A018
Detail	<p>My Clients have an agreement to act for the owners of land adjoining Briar Bank, Longtown which is identified in the Local Plan as site LO02 being one of 3 alternative sites to the only allocation in Longtown site LO01. It is pertinent to note that the site was one of 2 alternative sites at the time of the Preferred Options Consultation and that the allocated site at that time was 136 units now reduced.</p> <p>Carlisle, Longtown and Brampton are clearly seen in the current Local Plan as the Key Service Centres in the District and thus the most sustainable locations for new development.</p> <p>In comparison to Brampton's allocations which total 433 units the approach in Longtown of only identifying one site at 106 units appears to be unnecessarily restrictive. It is noteworthy that Dalston has more units as does Harker.</p> <p>My Clients confirm that the site is available to be developed and would like to see this land brought forward for housing development. It is noted that the Council's SHLAA recognises that the site is deliverable.</p> <p>I consider that the development of the land for residential purposes:</p> <ul style="list-style-type: none"> • complies with the thrust of the policy objectives contained within the National Planning Policy Framework ; • does not raise any significant highway related issues; • is physically well related to the built up area. Noted by CABE assessment as having potential for expansion; • could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties; and • would have limited visual impact upon the wider landscape being well contained by existing landscape material. <p>Taking into account the above points the allocation of the land for housing in the Local Plan 2015-2030 would be wholly appropriate and give flexibility and choice.</p> <p>The Local Plan should be modified by allocating the site for residential purposes under Policy 16.</p>			
20277	Support	Policy: 16		MOOR1
108	Mr A McCumiskey			A018
Detail	<p>I can confirm that the owners of Site MOoR,1 east of Monkhill Road, Moorhouse, support the allocation of their site in the Local Plan and can confirm that they are willing to take steps to bring the site forward. In that context they understand that there are no infrastructure issues and, accordingly, that the site is properly regarded as deliverable.</p>			

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Consultee Ref No	Consultees.Contact	Organisation		Agent
20387	Objection	Policy:	16	OC07
085	SJ Brough & RR Brough			
Detail	<p>We are owners of the site which was in the first public consultation the preferred site for Dalston. This has now been downgraded in favour of a site which is already under development in Dalston, therefore we consider that this should not be included in the 2015 - 2030 as it is already under development, the development starting several weeks ago and Story Homes are advertising that the properties will be available from Spring 2014.</p> <p>Dalston is a developing village and therefore to state that further growth over the next 15 years is not required, we feel is not acceptable. The village has several services including 2 schools, doctors,, dentists, a full range of shops and other services. The public transport links for the village are excellent with both regular bus routes and railway station.</p> <p>Therefore the village is ideally placed for future development towards the end of the proposed plan period once the current development is fully complete.</p> <p>In comparison to other villages within the plan such as Wreay, Scotby, Cumwhinton, Moorhouse and Linstock all of which have housing allocations Dalston is by far a more superior option for future sustainable development. The above villages do not have a secondary school or doctors surgery and most only have a small local shop.</p> <p>The issue of sewage capacity is also raised as a negative for the site. It has already been suggested by the Parish Council that the site should not exceed 15 houses.</p> <p>Therefore for a small scale development, an onsite sewage treatment plant such as a Klargester Envirosafe 42H plant which is suitable for up to 110 people could be used.</p> <p>A stream passes through the field in which the site is situated and therefore a suitable and sustainable sewage treatment plant can be installed and outlet discharge can easily be achieved.</p> <p>We urge you to reconsider the designation of this site, Dalston is a healthy and vibrant village and will over the next 15 years need further housing to grow and prosper. The site lies slightly outside the village centre with excellent road access, development of this site would not have a detrimental bottle neck effect on traffic as seen by some previous developments in Dalston.</p> <p>We would welcome a meeting on site to discuss the matter further.</p>			

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20201	Comment	Policy:	16	RICK1
051				A010

Detail

Site Location

- The Site is located to the east of Rickerby around a group of existing farm buildings
- Rickerby is located within walking distance of Carlisle Urban Area whilst offering a different housing market with a rural feel
- The Site is well related to public transport which can be accessed from Brampton Road, the Site is also well related to healthy living opportunities at Rickerby Park, Bitts Park and The Sands Centre
- The Site can be accessed via the Carlisle-Linstock Road

Supporting Reasons for the Inclusion of Land

- The Site is noted as a preferred housing site within the Preferred Options Carlisle Local Plan Review
- The Site offers the opportunity to realise housing which benefits from good connections to the urban area and the employment, retail, education and leisure facilities therein whilst providing for a market which prefers a more rural aspect
- The Site offers the opportunity to promote the retention of the barns which are on site and are currently unused. They offer a positive visual impact to the immediate environment and are part of the historic feel of Rickerby and their retention would be worthwhile wherever possible
- The Site is within Flood Zone 1
- The Site can provide higher quality housing to retain more people within Carlisle District.

Conclusions

- The Site offers rural living which benefits from urban facilities due to the relationship of Rickerby to Carlisle
- There are no known constraints which would preclude the Site coming forward for development and it's size means that it would quickly provide new properties without the need for extensive new infrastructure

20545	Objection	Policy:	16	RICK1
195	Andrea McCallum			Clerk to Stanwix Rural Parish Council

Detail

The Parish Council is concerned that this site should appear, without prior notice or consultation, in this 2nd draft LP when it was absent from both the 1st draft LP and the Strategic Housing Land Availability Assessment (SHLAA).
The Parish Council believes that development of this greenfield site, within the Rickerby Conservation Area (designated 1994), is contradictory of policies contained within the existing LP and the emerging LP and; that it would result in significant harm to an open space that contributes positively to the character of the conservation area and; the harm would outweigh any possible public benefits that might be alleged to accrue from development of the site.

For these reasons the Parish Council opposes the inclusion of the site at Tower Farm Rickerby, as one allocated for housing, and requests that it be withdrawn.

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Consultee Ref No	Consultees.Contact	Organisation		Agent
20388	Objection	Policy: 16		ROo6
057	Client of Taylor & Hardy	Ref: MEH/J/C13/057 - Armeria (UK)		Aoo4
Detail	land adjacent to the Rockcliffe Memorial Hall and rear of Telephone Exchange, Rockcliffe Site resubmitted as a whole and in sections Site A - Land adjacent to the Rockcliffe Memorial Hall Sites A & B - Land adjacent to the Rockcliffe Memorial Hall Site C - Land rear of Telephone Exchange, Rockcliffe			
20109	Support	Policy: 16		SCOT1
213		Henry Lonsdale Trust		A023
Detail	Our client supports the inclusion of Scot1 in the Local Plan allocated for housing and we confirm that it is available for immediate development.			
20206	Support	Policy: 16		SCOT1
213		Henry Lonsdale Trust		A023
Detail	Map enclosed showing covering SCOT 1 and land to the south [formerly part of SCO o8] and includes alterative site SC11. The site is in the same ownership as SCOT1 and would have access from SCOT 1 and from Hillhead to the south. The access from SCOT1 would be suitable with good visibility splays to accommodate development in this site as well as the development at SCOT 1. the site lies on the same general contour as SCOT 1 and can be well screened from traffic on the A69, the site being a further approx 2 HA will deliver approx a further 60 dwellings which together with SCOT 1 would provide roughly 100 potential dwellings which would contribute to the overall housing delivery in Carlisle. The CABE comments for Scotby suggest that this general formerly SCo8 has potential subject to 'careful containment', this refers to structural landscaping which would contain the site from external views. At present the well established hedgerows will from the basis of new structural planning which is already in place. The site is outside any known flood risk areas or be subject to any other constraints.			
20580	Support	Policy: 16		SCOT1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Members support this site. With potential to extend into the alternative site proposed; land at the end of Hill Road.			
20010	Support	Policy: 16		SCOT2
199		Simtor Ltd		Aoo4
Detail	In the context of the Approval of LPA Ref No 12/0790 it is noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20581	Comment	Policy:	16	SCOT2
193	Sue Tarrant			Clerk to Wetheral Parish Council
Detail	Already approved			
20501 E2	Objection	Policy:	16	TH04 & 05
065		Messrs Parker, Brown, Owens and		A014
Detail	SA Site TH02 could provide additional housing to satisfy the acknowledged need for expansion of the village of Thurstonfield. The SA states that Sites TH04 and TH05 could provide some additional housing, but this would still leave a shortfall. Site TH02 is available and deliverable and its development would not cause significant harm to the landscape character.			
20117	Objection	Policy:	16	WARW1
145/17	Mr Gordon Hunter			
Detail	<p>Question of Concern?</p> <p>Why are Northern Associates Ltd; approaching owners of properties backing on to the proposed development site, offering to buy the property well above market prices so they can build pedestrian access into the development? Does this infer that the council has already decided this is a 'done deal'?</p> <p>The information below was submitted to the council August 2013:</p> <p>The following are my concerns with respect to the building of dwelling in the field adjacent to Hurley Road.</p> <p>I have lived at 33 Hurley Road for 31 years, which backs onto the field where the proposed dwellings are to be constructed. Near the middle of the field the land falls from the North to the South with a low point adjacent to my boundary, when there is heavy rain the land holds water which stops my land draining, leading to localised flooding in my garden.</p> <p>When I purchased the house it was stated the adjacent field was a protected green belt, which reflected in the price and construction of the building would have an effect on the market value of my property</p> <p>The bridge over the river Irthing which connects Newby East to Little Corby has a weight restriction which is already being abused and the construction would attract more heavy traffic and naturally increase the traffic once the construction is complete.</p> <p>The field is a haven for bats, toads etc the construction would greatly affect their habitat</p> <p>The road leading from Little Corby to the gate entrance at the field has a number of blind bends and high bank dykes this is not suitable for pedestrians in particular young children and mothers with prams etc .</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees>Contact	Organisation		Agent
20510 E2	Objection	Policy:	16	WARW1
266	Mr Derrick Atkin			
Detail	<p>The village as it is now with regard to population is large enough, parking to access the village amenities I.E. Post office, Coop etc is stretched to breaking point a lot of the time. I am led to believe that some 80 houses are being proposed for this site, roads in and around the area will not support the extra traffic flow that construction of a housing estate will generate particulalaly in and around Hurley Rd where the road surface is worn out and access off the Newby Rd on the crest of a blind hill would create an ideal situation for more RTAs as it is used as a regular rat run morning and night with little regard to the speed limit in force for a minor road. Furthermore residents have enjoyed uninterrupted views over the fields to the North and would like them preserved, I myself can see across to Langholm from my house at this moment in time and I dont want to lose that to a housing developement which I believe to be inappropriate for this area.</p> <p>Request: Removal of this site as a developement area find some where else more appropriate</p>			
20382	Objection	Policy:	16	WARW1
239	Mr & Mrs I Fyfe			
Detail	<p>Could you please observe the good wildlife in the area which you are looking at for a new building area in the village. We have in this area: Pheasant, partridge, fox, badger & deer which the county should accept and protect.</p> <p>Where are the intended attachments to water flow, gas pipes, electricity lines and entrance roads to the proposed houses, Hurley Road is not a good road surface, has plenty of property on the road anyway and lots of children using the road to get to and from school.</p> <p>Could you please discuss the above points at your meeting and let the results be known to the local residents.</p>			
20100	Objection	Policy:	16	WARW1
211	W Watson			
Detail	<p>I am writing to you to object to the plan the council have to get builders to build on a Greenfield site just outside the village of Little Corby. I am concerned about vehicle access out onto a busy back road and speeding traffic. I would also like to know about the council consultation measures they have with the people of Little Corby about the above said project.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees>Contact	Organisation		Agent
20483 E1	Comment	Policy:	16	WETH1
262	Mrs Elisabeth Price	On behalf of Mr.and Mrs. C.L.Price		
Detail	<p>A thought occurred to me reference what would make villagers embrace the idea of 100 houses in Wetheral (50 each side of the road.) One answer would be a purpose built retirement village for 50 people on the site leading down to the river. I envisage clusters off 1 bedroom or 2 bedroom bungalows for people over retirement age. The council could have a competition amongst interested builders to build the most innovative buildings. These could be built round small courtyards facing out to make the most of the view. There would be a small piazza with a general shop, a hairdresser, walk in clinic etc. A man made small lake or pond. The villagers would be in walking distance of the new Community Centre. A retirement village would free up houses in the village where 3 and 4 bedroom houses are lived in by one person, thus bringing new life into the village</p> <p>I am concerned mainly with Wetheral which is designated as a consevation village. I would like to think that any development to the village was not done on a "build them cheap pack them up" scenario,There is an opportunity here for planners to suggest to builders that they are building for the future and that their buildings should reflect the surroundings of the village which despite many venacular styles is visually harmonious</p>			
20009	Support	Policy:	16	WETH1
199		Simtor Ltd		A004
Detail	<p>In the context of the submissions made on 30th August & 13 November 2013 (copies attached) it is noted that my clients are pleased that this allocation has been made and it is confirmed that the site will be brought forward for residential development in the near future.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
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20222	Objection	Policy: 16		WETH1
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077	Mr Alan Hubbard	National Trust		
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Detail (It is firstly noted that there is a discrepancy between Policy 16 and the detailed information for site WETH1 (on page 287) in respect of the site area. Policy 16 refers to it as being 3.49 hectares; whereas on page 287 it is stated to be 2.17 hectares (our quick assessment suggests that the area identified on the Policy Map for Wetheral is in fact around 2.5 hectares).)

In principle National Trust maintains its objection to the allocation of this site as set out in detail in its submissions dated 15th September 2013. Whilst information is now available regarding existing facilities in Wetheral it is noted that there is no primary school.

As stated at para 3.35 of the consultation document the NPPF says that "key facilities such as primary schools and local shops should be located within walking distance of most properties". Accordingly it is not considered that Wetheral is a suitable location for the provision of an additional 100 homes. Provision is to be made elsewhere through the Local Plan to cater for unmet Primary School needs, but not in Wetheral. The Trust would therefore question its sustainability credentials as a suitable location for 100 new houses in total.

Given the constraints imposed by existing mature planting and the proximity of designated heritage assets – in particular the adjoining Conservation Area and views to and from it – it is considered that the proposed allocation is a) far from ideal, and b) less suitable than the 'new' site that has come forward since the previous consultation (Site WETH2).

(If the site is retained remove the discrepancy regarding the site area of site WETH1 so that it is the same in Policy 16 and in respect of WETH1 (page 287).)

It is considered that there should be no additional housing provided in Wetheral.

If there is to be additional housing it should be limited to 50 units on site WETH2.

If, notwithstanding the above considerations, WETH1 is allocated for development then consideration needs to be given to:

- the form of that development;
- the protection of existing important planting;
- new structural landscape provision;
- the detailed impacts upon the Conservation Area and its setting; and
- the detailed impacts upon Wetheral Priory and its setting.

Such matters and how they are to be addressed, e.g. Through a Development Brief, should be more clearly set out in the Local Plan.

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20511 E2 Objection Policy: 16 WETH1

267 Mr Peter Andrews

Detail
 Objections to building of 50 houses south of Wetheral, on west side of Cumwhinton Road, opposite the newly constructed village hall 1. The proposed site is Grade A agricultural land which should be retained for food production. There are brown field sites in other areas of Carlisle. 2. With a development on the opposite side of Cumwhinton Road, there could be up to 200 extra cars turning on to the B6263 which is already busy. Cars from these developments going to Carlisle are likely to use Primrose Hill and Scotby Road, which are already congested with parked cars due to lack of drives and garages for existing houses. 3. There is already pressure on school places in Scotby and 2 new developments are under construction in that village, so where are the school places for children from the proposed 100 extra houses? 4. Are current utility supplies - electricity, sewerage, gas, water - adequate to provide for extra housing? The south end of the village is prone to electricity cuts. 5. No indication that provision will be made for housing suitable for first-time buyers, which is essential if younger people are to be able to stay in the village, as many want to do.

Request: Not using the site at all, but building just on the Glebe development, which has been previously agreed, although never implemented, and within that development making sure that there is some new housing that is affordable for first-time buyers, so that young people brought up in Wetheral can remain here and provide continuity of the strong community life that exists in the village at present.

20425 E0 Objection Policy: 16 WETH1

251 Mr Alistair Martin

Detail
 We feel that the future proposed development sites in Wetheral are not sustainable because, lack of primary schools in Wetheral, there aren't any! an surrounding areas schools are all full to bursting. With the construction of the village hall already causing traffic problems, B6263, we can only see more problems and future accidents looming due to increased traffic exiting from the proposed sites. The proposed plan is far too large for a village as small as Wetheral. We do not object to a small development already planned for the land to the east of B6263. The land west of B6263 is deemed high quality agricultural land. Government (NPPF 112) Why develop two green field sites when one would be sufficient.

Remove Wetheral 2 altogether from the future plans and develop a new housing scheme in a village such as Blackford which has a school and good road links to the city.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20242	Objection	Policy:	16	WETH1
228	Mr Norman Brown			
Detail	<p>I have read a substantial part of the document in an effort to see the bigger picture, and something that stands out to me throughout the report is the liberal use of the phrase 'considered a sustainable location' in the instances of many villages.</p> <p>When you read further, the evidence used to support the phrase is the fact that the village may already support a shop, a pub or a church. I find this a remarkable way to measure sustainability within a 21st century society!</p> <p>Why? In the case of first two, shops and pubs they have been disappearing as viable businesses here in the UK quicker than the dinosaur did!</p> <p>The latest CGA-CAMRA Pub Tracker, covering the period of April-December 2013, shows that the number of pub closures in the UK has risen from 26 to 28 per week. With regard to shops the latest figure I can obtain being 400 closures of rural shops in 2011.</p> <p>With such commercial enterprises being in private hands and with the evidence clearly suggesting they are suffering to a greater degree than the overall economic downturn, the question I have to ask of the authors of this study is why then are they considered as good evidence for a sustainable community?</p> <p>Surely there are better parameters to use such as: road capacity, the number of alternative routes for access and egress, connections to other main roads, parking available, through route consideration, convenience for commuting, and likelihood of flooding, priority for gritting during winter, schools, surgeries, clinics, and even broad band connection!</p> <p>Surely any combination of the above would deserve greater prominence in such a report than a local pub or shop, and if they were, I would be more convinced by the statements made in the document!!</p> <p>Request:</p> <ol style="list-style-type: none"> 1. Limit the number of houses being proposed in both WETH1 & WETH2 unless it is matched with a proportionate spend on infrastructure projects in order to serve the community adequately. 2. In recent years, following sustained rain the village has found itself cut off due to flooding on all 3 roads connecting the village. One of the areas prone to flooding is the B6263 between Wetheral and Cumwinton, and yet there is no mention of this or any evaluation in the document of the consequences of building 100 houses at the South end of the village. Surely given the loss of land and the large volume of concrete and tarmac to be substituted, then this problem will only be exasperated? 3. Look again at WETH2, which is a substantial development on prime agricultural land, determine if there are alternative locations which would accommodate the proposed number of dwellings but have less of an impact on the natural habitat. 4. Re appraise the criteria used throughout the document used to define 'sustainable location' 5. Think laterally! Consider a completely New Village somewhere, taking into account my main comments in answer to question 5. 			
20582	Support	Policy:	16	WETH1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Members support this site and suggest 60 homes.</p> <p>The sewerage works require upgrading and provision of primary education in the village as all other primary schools close by are close or at capacity. The 106 agreement should be towards the building of a new school in the village. The number of households would increase to approximately 800. See Parish over view below</p>			

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20478 E1	Objection	Policy:	16	WETH1 & 2
261	Mr Graham Watt	Wheatsheaf Inn, Wetheral		
Detail	NO SCHOOL IN WETHERAL if anyone was to actually think this through you would see what a problem this would be. Look at size of village and size its going to then look at other villages and see how full their schools are			
20494 E2	Objection	Policy:	16	WETH1 & 2
264	Mrs Elizabeth Hill-Gorst	SAVE WETHERAL VILLAGE GROU		
Detail	Ref Site Weth 1 and Weth 2 - This is a prime example wanting to build on prime farm land. There are already existing (in progress) developments for nearly 100 houses in Scotby and the surrounds . We believe significant infrastructure work would be required (e.g. primarily drainage/sewerage, road improvement, utilities etc) that this anticipated density could have a massive negative impact on the area both visually, structurally and physically. These sites are also relatively close to the named habitat area of the River Eden and could have some of the named impacts e.g water and land pollution, wildlife, etc as listed in the Habitat Appraisal. We would seriously ask that this be reconsidered. Our first preference would be a reduction in density of indicative yield that is listed. Suggestion is that if development should occur that it is restricted to Site Weth 1 and that a retirement community build might be more acceptable to the village and could provide a useful and sustaianable service to the Carlisle area which is short of this type of resource. The adjacent site is already being developed with a new community centre which would be ideal to provide some services to such a community.			
20244	Objection	Policy:	16	WETH1 & 2
229	Kevin James			
Detail	<p>I wish to register my opposition to the proposals to build a number of houses in the village of Wetheral. There are a number of concerns.</p> <p>Road access is currently incapable of handling the volume of traffic,safely between the A69 and Junction 42 of the M6. School placements couldn't cope with the influx of families with 2.2 children or more. There is no consideration given to the increase in air pollution arising from the increase in traffic. The disruption to natural habitat and wildlife has not been measured or considered. The problem with available parking spaces in and around the area of the new Village Hall and the playing fields has not been considered.</p>			

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20243	Objection	Policy:	16	WETH2
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228 Mr Norman Brown

Detail

I have read a substantial part of the document in an effort to see the bigger picture, and something that stands out to me throughout the report is the liberal use of the phrase 'considered a sustainable location' in the instances of many villages.

When you read further, the evidence used to support the phrase is the fact that the village may already support a shop, a pub or a church. I find this a remarkable way to measure sustainability within a 21st century society!

Why? In the case of first two, shops and pubs they have been disappearing as viable businesses here in the UK quicker than the dinosaur did!

The latest CGA-CAMRA Pub Tracker, covering the period of April-December 2013, shows that the number of pub closures in the UK has risen from 26 to 28 per week.

With regard to shops the latest figure I can obtain being 400 closures of rural shops in 2011.

With such commercial enterprises being in private hands and with the evidence clearly suggesting they are suffering to a greater degree than the overall economic downturn, the question I have to ask of the authors of this study is why then are they considered as good evidence for a sustainable community?

Surely there are better parameters to use such as: road capacity, the number of alternative routes for access and egress, connections to other main roads, parking available, through route consideration, convenience for commuting, and likelihood of flooding, priority for gritting during winter, schools, surgeries, clinics, and even broad band connection!

Surely any combination of the above would deserve greater prominence in such a report than a local pub or shop, and if they were, I would be more convinced by the statements made in the document!!

Request:

1. Limit the number of houses being proposed in both WETH1 & WETH2 unless it is matched with a proportionate spend on infrastructure projects in order to serve the community adequately.
2. In recent years, following sustained rain the village has found itself cut off due to flooding on all 3 roads connecting the village. One of the areas prone to flooding is the B6263 between Wetheral and Cumwinton, and yet there is no mention of this or any evaluation in the document of the consequences of building 100 houses at the South end of the village. Surely given the loss of land and the large volume of concrete and tarmac to be substituted, then this problem will only be exasperated?
3. Look again at WETH2, which is a substantial development on prime agricultural land, determine if there are alternative locations which would accommodate the proposed number of dwellings but have less of an impact on the natural habitat.
4. Re appraise the criteria used throughout the document used to define 'sustainable location'
5. Think laterally! Consider a completely New Village somewhere, taking into account my main comments in answer to question 5.

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20468 E1 Objection Policy: 16 WETH2

259 Mr Stephen Bowe

Detail Fundamentally, there is no Primary School in the village and developing further houses in the village seems to contradict the Council's principle of good access to this type of school. The schools in the local vicinity are all full and further development plans in local villages will only lead to more children requiring places. Currently all children in the village have to travel on "B" classification roads to travel to school. Further housing will lead to more travel on and already busy minor classification road. Development of this site will impact the particularly pleasant view of the village when travelling North on the B6263. Arguments have been supported that other sites shouldn't be developed because of the visual impact of the village (both in Wetheral & elsewhere). Therefore there seems to be an inconsistency of approach. The site is a well-used agricultural field and has proven versatility by being used for a variety of uses. I would also be concerned about the on-going viability of Abbey Farm if the usable land was reduced. using this site seems to contradict the Government's view of protecting the best and most versatile agricultural land. The development plans for Wetheral concentrate in one particular area of the village (Weth 1 & 2). This is will lead to significant additional traffic in a concentrated area particularly at peak times. Additionally, the new Community Centre is currently being constructed in the same area with an unknown number of vehicles attending this facility. Parking is already an issue in this area when the Playing Fields are in use (cars park on the grass verges etc). No obvious opportunity to construct a pavement on the B6263 on the Weth 2 side of the road. Constructing approx. 100 houses in Wetheral is an over-development of the village.

Remove Weth 2 from the preferred option in the Plan. Instead concentrate development where school places exist or school development plans are already in place to increase the availability of school places. Additional factors for development should be where travel requirements are kept to a minimum and where road networks exist with an "A" road classification. Significant investment has been made to the West of the City with the construction of the by-pass etc. Business development would naturally be attracted to this side of the City and housing development should compliment this by being constructed locally on the West & North sides of the City.

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20405 Eo Objection Policy: 16 WETH2

247 Mrs Samantha McAlister

Detail We don't feel that the proposed development sites in Wetheral are sustainable for the following reasons:
 There is no Primary School in Wetheral, the largest village in the area, and no land allocated for such. The council's development plan states that good access to a Primary School is a key requirement (5.18) while the NPPF (72) states there should be 'sufficient choice of school places available to meet needs of existing and new communities.' All our local schools are full and further developments are taking place in the surrounding villages. With an emphasis on reducing Carbon emissions surely this should be a priority.
 Nearly all the other villages that have been earmarked for development have a Primary School, none of which have as many houses as Wetheral proposed. The exception being Dalston which has both a Primary and Secondary School.
 Cars park on both sides of the B6263 outside the existing properties causing traffic flow problems now. With the construction of the village hall along this stretch of road this problem is likely to be exacerbated. Adding exits from housing estates on two sides of the road will cause even more problems.
 The proposed development is too large in proportion to the village. Wetheral does not have the infrastructure in place to enable such a large development to take place. Wetheral is a particularly attractive village with a small tourist trade: it is precisely these communities that David Cameron talked about when saying "Our reforms will make it easier for communities to say we're not going to have the big plonking housing estate landing next to the village, but we would like 10, 20, 30 extra houses and would like them built in this way." We are not adverse to a small development on the previously earmarked land to the East of the B6263.
 The Government have re-affirmed the importance of protecting the best and most versatile agricultural land (NPPF paragraph 112). The land to the West of the B6263 is deemed to be of a high quality.
 A development to the West of the B6263 would have a detrimental visual impact as you enter the village from the South. With reference to the Rural proofing report, the area of landscape that frames the edge of the village would be destroyed. Weth 8 has been removed from the options, one reason being 'there are large houses in large plots, with open fields to the rear. The development of this site would unacceptably alter the character of this area.' Exactly the same can be said for this development behind Ashgate Lane.
 Why develop two green field sites, destroying natural habitats and impinging on the wildlife when there is sufficient room on one site to build the required number of houses?
 Request: Remove Weth 2 from the preferred options. Develop new village locations where there are schools without a village for example Stoneraise and Blackford. Both these areas have good road links in to the City of Carlisle.

20415 Eo Objection Policy: 16 WETH2

249 Mr John Murray Anderson

Detail There is no Primary School in the village and no land allocated for one, the local schools are full and to expand the village by another large development should not be considered without a school being built.
 A much smaller development of bungalows for the ageing population and for people to downsize to.

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20450 E1 Objection Policy: 16 WETH2

255 Mr & Mrs McIntosh

Detail Firstly we would like to question the requirement of 100 houses in Wetheral to meet the local needs. There would appear to be a justifiable case to argue that there would be more appropriate locations to accommodate at least part of that allocation, in particular in more sustainable locations ie. those with better access to a primary school. It is also noted that Wetheral has been the subject of several housing developments in the last few years with more applications pending which assist in meeting local needs. Secondly there is no mention of the proposed site in the SHLAA raising issues as to whether this site has been assessed. If it had, the following issues should have been addressed: The beck running along the Western parameter of the field floods onto the unclassified road, if drainage from the site can't be constrained there is an increased risk of flooding. Other constraints would be the power line which crosses this site and access onto the B6263 which will be exacerbated by development on both sides of the road. The land is classed as high quality agricultural land and should be preserved/protected. (NPPF paragraph 112). When entering the village from the South the area of landscape that frames the edge of the village would be destroyed (ref: Rural Proofing Report) blocking the view of the chapel, a heritage asset. The open aspect and views of the Lake District National Park would be lost to the properties boarding the site, considerations that have been taken into account when turning down proposals for other sites. (Plains Road, Wetheral, Scotby, Wreay, Warwick Bridge).

Remove Weth 2 from the preferred options. Develop new village locations where there are schools without a village for example Stoneraise and Blackford. Both these areas have good road links in to the City of Carlisle. Explore other sites around Rockcliffe.

20455 E1 Objection Policy: 16 WETH2

256 Allen Hodgson Wise

Detail There is no primary school in Wetheral the largest village in the area, and no land allocated for one. The councils development plan states, "that good access to a primary school is a key requirement" (5.18) while the NPPF 72) state there should be "sufficient CHOICE of school places available to meet needs of existing communities". Nearly al the other villages that have been earmarked for development have a primary school, none of which have as many houses as the Wetheral proposal. The proposed development is to large in proportion to the village. Wetheral does not have the infrastructure to support such a large development. Cars already parking on the B6263 outside existing properties cause traffic flow problems now. This will only be exacerbated by adding exits from housing estates on two sides of this road.

Remove Weth 2 from the preferred options. Develop new village locations where there are schools within a village.

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20461 E1 Objection Policy: 16 WETH2

257 Mrs Marjorie Jane Wise

Detail

1)Wetheral has no Primary school and has no land allocated for one, the council's development plan states that good access to a Primary school is a key requirement (5.18) (NPPF 72) state there should be " sufficient CHOICE of school places available to meet the needs of existing and new communities" ALL OUR LOCAL SCHOOL ARE FULL.

2) Most of the other villages that are to be developed have primary schools, with the exception of Dalston which has Primary and secondary schools

3) The B6263 outside the existing housing causes traffic flow problems now, The construction of the new Community centre on this road and adding further exits from the proposed housing will exacerbate the problem, add children on cycles to this congestion and you now have a possible dangerous piece of very busy road.

4)The development is far too large for Wetheral village, which does not have the infrastructure to support such a development

5)The development of this site would unacceptably alter the character of this special, beautiful, rural Village

1) Remove Weth 2 from preferred options.

2)The proposed development needs to b reduced in size.

3) Wetheral needs a Primary school

4)Reduce traffic flow through the centre of the village

5) All the roads into the village are in desperate need for repair, the heavy duty and volume of the wagons and lorries delivering building supplies will without doubt cause further deterioration of the already badly damaged roads, to repair them will be very expensive

20383 Objection Policy: 16 WETH2

240 Mr & Mrs Johnston

Detail

The development to the west of the B6263 would have a detrimental impact as you enter the village. It would not give a balanced entrance as to any development from the other side of the road is screened from view.

We look onto open countryside towards the lake district national park and this is a rural community.

There are people wanting to farm who are looking for good quality agricultural land. By developing this site we would loose high quality land loose also employment of farms and farm labourers.

The country as a whole needs to keep up with farm producing, we need farms to feed the people of our country so by taking land from our village's this land is too good for any building. Fresh field, lamb playing in the fields, children growing up in smaller village. Please do not take this away with brick and cement.

Wetheral has been identified as being a sustainable village, however if development continues to take place the facilities it does have will not be adequate.

There are other villages in the area that have schools that struggle to fill them and by the lack of housing in these areas have lost village shops, post office etc. So if more development in places e.g. Heads Nook. Castle Carrock, Blackford. It is necessary to develop these villages to ensure it would be sustainable in the future.

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20473 E17 Objection Policy: 16 WETH2

260 Mr Garry Leadbetter

Detail The addition of 98 extra houses split between Wetheral South and the land west of Steele's Bank will potentially result in 200 + extra children in the village which has no Primary School facilities of its own. This will need to be addressed prior to any further development and any chosen developers required to pay for the construction of a new Primary School for the village. I believe United Utilities have already identified major Water Treatment and Sewage capacity problems that need to be attended to before any development takes place, and that this will take many years to put right. No new development should be considered before this problem is tackled. The proposed development will result in 100 + extra cars using an already restricted and increasingly dangerous overcrowded road through the village centre.

Scale back the number of new houses being considered for Weth.1 and consider retaining Weth 2 as a prime greenfield agricultural site.

20618 Objection Policy: 16 WETH2

274 Mr Paul Greenwood

Detail There is no Primary School in Wetheral, the largest village in the area, and no land allocated for such. The council's development plan states that good access to a Primary School is a key requirement (5.18) while the NPPF (72) states there should be 'sufficient choice of school places available to meet needs of existing and new communities.' All our local schools are full and further developments are taking place in the surrounding villages. With an emphasis on reducing Carbon emissions surely this should be a priority.

Nearly all the other villages that have been earmarked for development have a Primary School, none of which have as many houses as Wetheral proposed. The exception being Dalston which has both a Primary and Secondary School.

Cars park on both sides of the B6263 outside the existing properties causing traffic flow problems now. With the construction of the village hall along this stretch of road this problem is likely to be exacerbated. Adding exits from housing estates on two sides of the road will cause even more problems.

The proposed development is too large in proportion to the village. Wetheral does not have the infrastructure in place to enable such a large development to take place. Wetheral is a particularly attractive village with a small tourist trade: it is precisely these communities that David Cameron talked about when saying "Our reforms will make it easier for communities to say we're not going to have the big plonking housing estate landing next to the village, but we would like 10, 20, 30 extra houses and would like them built in this way..." We are not adverse to a small development on the previously earmarked land to the East of the B6263.

The Government have re-affirmed the importance of protecting the best and most versatile agricultural land (NPPF paragraph 112). The land to the West of the B6263 is deemed to be of a high quality.

A development to the West of the B6263 would have a detrimental visual impact as you enter the village from the South. With reference to the Rural proofing report, the area of landscape that frames the edge of the village would be destroyed. Weth 8 has been removed from the options, one reason being 'there are large houses in large plots, with open fields to the rear. The development of this site would unacceptably alter the character of this area.' Exactly the same can be said for this development behind Ashgate Lane.

Why develop two green field sites, destroying natural habitats and impinging on the wildlife when there is sufficient room on one site to build the required number of houses?

Remove Weth 2 from the preferred options.

Develop new village locations where there are schools without a village for example Stoneraise and Blackford. Both these areas have good road links in to the City of Carlisle.

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Consultee Ref No	Consultees>Contact	Organisation		Agent

20420 Eo Objection Policy: 16 WETH2

250 Mr David Fordy

Detail

1. Wetheral is the second largest village in the area, but has no schools of any kind. (Dalston which is the largest has both a primary and secondary school) The council's development plan states that this has to be a key requirement. There are not enough places available for our existing needs, or indeed choices. So why consider further development in an area that can't meet the necessary requirements.
2. Nearly all the villages that have been listed with the exception of Dalston, have a primary school. None of them except Dalston has as many houses.
3. The B6263 which runs through Wetheral is already overused. It is the main link road from the A6 to A69. To have two entrances from two proposed new development sites plus a new Leisure centre onto a road that already has a parking problem due to the houses and businesses that have no option but to park there.
4. Wetheral could not cope with any large development, due to the size of the village.
5. Would it not suffice to reduce the existing site which has been earmarked to 50, which would conform to David Cameron's vision on rural communities.
6. The land to the west of the B6263 is high quality land, which at this moment in time is full of Sheep and Lambs.

Remove Wetheral 2 from preferred options. Why not use country schools that have no villages.

20583 Support Policy: 16 WETH2

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail

Members support this site and suggest 40 homes. The sewerage works require upgrading and provision of primary education in the village as all other primary schools close by are close or at capacity. The 106 should be towards the building of a new school in the village

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

20189 Objection Policy: 16 WETH2

265 Donald Forrester

Detail Wetheral has not had a Primary School since the early 1980's, this was closed in favour of Scotby, At the time residents were assured Scotby School would meet the needs of both communities. It is understood the local Primary Schools (Scotby/ Cumwhinton) are full and are likely to be so for the foreseeable future and this is without any further development in the area.

The secondary catchment school is The Richard Rose Academy, which may face issues with capacity soon. Since the closure of the NTC at Harraby, there is no secondary school in the south 'east' of the City and, given the planned number of properties, circa 960 in the area, it is difficult to envisage there will not be a requirement for a new school.

The addition of around 139 properties in Wetheral, coupled with 44 proposed and 45 currently under construction in Scotby, immeasurable strain will be placed on the education system within the area. How factors which determine future child school places are calculated I have no idea. However, if we said one child per household as a rule of thumb, a requirement for a further 228 school places will exist. In short, not sustainable on educational grounds.

Almost all of the villages outlined in the document have Primary schools with the exception of Dalston which has Primary and Secondary Schools.

Traffic flow and movement: It is envisaged almost all of the traffic generated as a result of additional house building in the south of Wetheral will converge on the City via Cumwhinton village, not the best of places for traffic volume at present.

The B6263 is a 'rat run' from the A69 to the M6 generating fast flowing volumes of traffic at all times through both villages. Building 100 new homes, in addition to flats and other properties already granted permission via the planning process, plus those constructed yet to sell, will generate additional volumes of traffic. On top of which, people visiting the Playing Field and new Village Hall will add traffic to a very busy road.

The movement and volume of traffic in the south 'east' of the City along Cumwhinton and London Road is not sustainable.

A development of such a scale in both size and volume on the entrance to Wetheral will have an detrimental visual impact/effect. It transpires WETH 8 was removed from the Options because "there are large houses in large plots, with open fields to the rear. The development of this site would unacceptably alter the character of this area". The plots of the houses on Ashgate Lane fall directly into the described criteria and as such, should be afforded the same treatment.

Wetheral over the years has had its share of development and has continued to develop on an infill basis. Is there a requirement or need to build and develop green field sites on potentially quality farm land? It is hard to envisage any developer building high quality houses in small numbers not to detract from the visual aspect coming into the village from Cumwhinton.

Changes Sought: It came as a major surprise, nay a shock, to see this portion of land placed into the Carlisle and District Development Plan 2015-2030 Consultation Stage 2. WETH2 was not considered within the Consultation Process during Stage 1 in September 2013 and no objections were raised with regards to the original option. On what basis have the planners decided to include another portion of land, given the clear statement and concise statement that Wetheral had no alternative options.

Withdraw WETH2 as a preferred option for the same reason WETH8 was withdrawn.

Water stands in the field, what effect will pouring of concrete and tarmac have on the surrounding environment?

Other issues of concern :

Education.

Transport/Highways

Development in a rural location of natural beauty on potentially good sound farming land (green field).

Visual impact the entrance to the village.

The development is too large a concept for the leading edge of a dormitory village.

20118	Objection	Policy:	16	WETH2
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215	William Heaviside			
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Detail

I am writing in respect of the agricultural land adjoining the B6263 to the south end of Wetheral village, and opposite the new village hall presently undergoing construction.

This land, owned by the Church commissioners, lies to the rear of Ashgate Lane, where my wife and I have resided for some 28 years.

We have been given to understand that there is a proposal to make this land available for future development and sold on to a developer.

With regard to this matter these are our objections:

it is well known that Wetheral village is considered a sustainable development i.e. doctors, church, hotel, shop, restaurant, playing fields, railway etc. However the village lacks a primary school and there are issues with sewer capacities.

Last summer Carlisle City council issues a Version 1 2015/16 Preferred Options Consultation Document which closed Sep 2013, this land was not included. What has changed in 6 months?

NPPF provides guidance of properties to be built per HA (30). I am given to understand that 50 houses is the number of houses under consideration. The area in question is 1.6HA. This outstrips the NPPF. Additionally a cluster of houses in such large numbers crammed into a small site will detract from the entrance to a dormitory village.

It is understood that CCC the Local Education authority anticipate a significant increase in new starters at Primary Schools, based on recent birth rates. No doubt a major issue given the extent of new development that shall be built within the city over the next 15 years. A new Primary School will be required. Wetheral Primary School closed in 1980.

Most new residential development in the rural area will be focused in sustainable locations. This means villages which have or have good access to a Primary School.

The Primary Schools within a 2 mile radius, Scotby, Cumwhinton, Warwick Bridge are full!

In conclusion I would outline our concerns as follows:

1. Proposal represents over development of a small crowded site in a rural scenic location.
2. this may set a precedent for future development in the vicinity.
3. The land is a 'Greenfield Site' used for agricultural purposes. It is not an 'in fill' site.
4. Properties built on this site will overlook existing properties many of which are single story thus affecting privacy and in some cases light.
5. Any building on the edge of Wetheral sets the tone of the village. The effect of this proposal will detract from what may be considered as Carlisle's Premier Village.
6. Would any development likely to have an adverse affect on sites protected under Birds and Habitats Directives.
7. The B6263 is an extremely busy road and used as a 'rat run' between he A69 and M6. The increased housing and traffic will create potential dangers.

Whilst my wife and I realise that at this stage it is not a Planning Application, we have grave concerns in the eventual development of the land and the problems likely to ensue.

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Consultee Ref No	Consultees.Contact	Organisation		Agent

20488 E2 Objection Policy: 16 WETH2

263 Mr Daniel McViety

Detail We don't feel that the proposed development sites in wetheral are sustainable for the following reasons -

- 1) There is no primary school in wetheral - the largest village in the area and no land allocated for such. The councils development plan states that good access to a primary school is a key requirement (5.18) while the NPPF (72) states there should b 'sufficient choice of school places available to meet the needs of existing and new communities.' All our local schools are full and further developments are taking place in the surrounding villages . Wlth an emphasis on reducing carbon emmissions surely this should be a priority.
- 2) Nearly all the other villages that have been embarked for development have a primary school , none of which have as many as wetheral proposed. The exception being Dalston which has both Primary and Secondary schools.
- 3)Car parks on both sides of the B6263 outside the existing properties causing traffic flow problems now. With the construction of the village hall along this stretch of road this problem is likey to be excerbated, Adding exits from housing estates on two sides of the road will cause even more problems.
- 4) The proposed development is too large in proportion to the village. Wetheral does not have the infrastructure in place to enable such a large development to take place.
- 5)Wetheral is a particularly attractive village with a small tourist trade. It is precisely these communities that David Cameron is talking about when saying 'our reforms will make it easier for communities to say we're not going to have the big plonking housing estate landing next to the village , but we would like 10,20,30 extra houses and would like them built in this way...' We are not adverse to a small development on the previously embarked land to the east of the B6263.
- 6) The government have reaffirmed the importance of protecting the best and most versatile agricultural land (NPPF paragraph 12 The land to the west of the B6263 is deemed to be of high quality.
- 7) A development to the west of B6263 would have detrimental visual impact as you enter thevillage from the south. With reference to the rural proofing report, the area of landscape that frames the edge of the village would be destroyed. Weth 8 has been removed from the options , one reason being 'These are large houses in large plots , with open fields to the rear. The development of this site would unacceptably alter the character of this area.' Exactly the same can be said for this development behind Ashgate lane.
- 8) Why develop two green field sites , destroying natural habitats and impinging on the wildlife when there is sufficient room on one side to build the required number of houses?

Remove Weth 2 from the preferred options. Develop new village locations where there are schools without a village for example stoneraise and Blackford. Both these areas have good road links to the city of Carlisle.

20328 Support Policy: 16 WETH2

062 Church Commissioners for England A013

Detail We fully support the Council's preferred options for addressing housing need and demand in Wetheral. It is considered that site WETH 2 (as identified on page 288 of the consultation document), is a suitable, achievable and deliverable site.

Full supporting comments are included within the representation

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

20292	Objection	Policy:	16	WREA1
046		Messrs Osgood		A009

Detail

I am objecting on behalf of my Clients, Messrs Osgood, to the allocation of the land to the west of Wreay Primary School for residential development in the emerging Local Plan (L.P.A. Reference WREA1).

I wish to reiterate that it is my view that the allocation of the proposed site in Wreay is contrary to the policies identified in the emerging Local Plan for the reasons identified in our previous correspondence dated 11th September 2013 (Our Ref : SG/J/C13/111a). I have attached a copy of our previous objection.

In addition to the previous concerns raised, the allocation of this site for residential development will constrain future opportunities to extend the primary school, which may be necessary at a future date.

There are other primary schools in Carlisle District that are landlocked. This has created problems where those schools are oversubscribed and need to expand; Cumwhinton Primary School is one such example. To actively create a problem for the future, particularly where an alternative housing site exists, is nonsensical. Whilst not necessarily a planning matter, there is also concern that the proposed dwellings may overlook the school which could raise perceived safety issues from parents of children attending the school.

Request: The exclusion of this site as a housing allocation.

20722	Objection	Policy:	17	
194		Michael Barry		Cumbria County Council

Detail

Stage 1 Representation No 1006 to which amendments were made to Criterion 1 & 4. Amended Background information submitted. Suggested Change: Include a new Criteria stating: "the development will not prejudice the delivery of infrastructure or other key sites needed to successfully implement the Local Plan".

Criteria 5 should be amended to read: "in the rural areas there are services including a primary school in the village where the housing is proposed, or there is good access by public transport or foot to one or more other villages with services including a primary school, or to the larger settlements of Carlisle, Brampton and Longtown."

It is suggested that if the Local Plan does not set out a settlement hierarchy, it should look to offer commentary on the role of settlements to help explain the forms of development that may be appropriate at these.

20380	Objection	Policy:	17	
005		Paul Barton		Clerk to Dalston Parish Council

Detail

Policy 17 (3) should be strengthened by including 'with high quality Construction methods and materials'.

Policy 17 should be strengthened by including a policy on the boundary treatments for new housing developments. New boundaries should Enhance the appearance of the development, whilst existing high amenity. Boundary treatments such as indigenouness hedges should be retained. Whenever possible, and not removed without planning permission.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20302	Support	Policy: 17		
234	S Nicholson			A008
Detail	Explicit support on the basis of the policy providing appropriate provision for housing development on non-allocated sites.			
20086	Comment	Policy: 17		
209	Mr Peter Lamb			A025
Detail	<p>We broadly agree with the objectives of Policy 17 which looks to allow housing development within villages across the wider district to fulfil identified needs. The use of a criteria-based policy, rather than a rigid 'development boundary' approach, is welcomed because it enables schemes to be determined on their merits, rather than pre-determining the acceptability of any scheme based on an fixed boundary.</p> <p>We propose the following modification to the policy wording: deletion of "through consultation with the local community" within the paragraph: "Applicants will be expected to demonstrate through consultation with the local community how the proposed development will enhance or maintain the vitality of rural communities. On major development proposals of 10 or more dwellings, consultation should be undertaken with the local community."</p> <p>The reason for this change is that it would also distinguish more clearly between two issues: firstly whether a scheme would indeed enhance vitality (a fairly objective matter), and the local popularity of any scheme (which is far more subjective). The change would also ensure that smaller proposals are not overburdened by the need for public consultation processes at the pre-application stage, when the Local Planning Authority will in any event consult the public on a scheme after it is submitted.</p>			
20180	Support	Policy: 17		
225	JR & JA Workman			A008
Detail	Explicit support on the basis of the policy providing appropriate provision for housing development on non-allocated sites.			
20169	Support	Policy: 17		
034	Lucy Adamski			A008
Detail	Explicit support on the basis of the policy providing appropriate provision for housing development on non-allocated sites.			
20154	Support	Policy: 17		
223		Taylor Wimpey UK Limited		A026
Detail	<p>Taylor Wimpey UK Limited supports the principles of Policy 17 as it permits new housing development on sites other than those allocated within Carlisle, Brampton, Longtown, and villages within the rural area provided that they meet certain criteria. It is considered that the future development of the Deer Park Site would be appropriate under this policy context.</p> <p>Vision for Deer Park was submitted with the Representaion.</p>			

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

20329 Support Policy: 17

062 Church Commissioners for England A013

Detail We support this policy, in principle, in respect of small scale housing sites as it provides the flexibility required to address the housing need and demand throughout the district, including the necessary growth required to meet need and demand in the more rural settlements. However, development on nonallocated sites should not come forward where it threatens the delivery of larger sites with existing permissions or land allocation. Care should therefore be exercised in the application of this policy.
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.
Housing development on non-allocated land will help provide a wider choice of housing for a greater number of communities.

20564 Objection Policy: 17 101 - 102

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail Page 101: There is no evidence that villages work in clusters
Consultation Update: Do not agree_ What about:- Wetheral/Great Corby; Warwick Bridge/Little Corby/Corby Hill; Heads Nook / Warwick Bridge; Cotehill/Cumwhinton
Page 102: Applicants must demonstrate thorough consultation with the local community not "will be expected". There should be an agreed method how this is undertaken. Otherwise developers could do the bare minimum.
There is no mention of extra care housing

20593 Objection Policy: 17 102

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail Applicants must demonstrate thorough consultation with the local community not will be expected. There should be a method that this is undertaken similar to the rural master plan consultation.

20350 Comment Policy: 17 102

154/26/27 Mr Bryan Craig

Detail Point 3: Can we add' high quality construction and boundary treatments in line with the local vernacular'.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20669	Objection	Policy: 17	102	
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. Many of the villages and towns mentioned in the policy contain conservation areas and other heritage assets. Therefore, it will be expected that any development proposals for housing should have regard to this.</p> <p>Therefore, the list of criteria should be amended to include reference to heritage assets.</p> <p>An additional bullet should be introduced to read “the proposal does not affect the significance of heritage assets”</p>			
20330	Support	Policy: 18		
062		Church Commissioners for England	A013	
Detail	<p>Housing density is no longer set out in national planning guidance following the publication of the NPPF. Notwithstanding this, the majority of schemes will probably still base their average density on 30 dwelling per hectare (as set out in the now superseded ‘PPS3 Housing’).</p> <p>Although it is acknowledged that city centre development should have a higher density to the urban edge development, each site should be assessed on its own individual merits to ensure the scheme takes into consideration any site constraints and that the end scheme is deliverable and viable. We therefore support Policy 18 as it is important to ensure that development land is used efficiently whilst preserving the appearance of the built environment.</p>			
20127	Support	Policy: 18		
218	Executors of Mrs M Coulson		A013	
Detail	<p>We welcome the flexibility of the policy which seeks to optimise the use of land to deliver housing development but also allows schemes to respond to local character and context. The Council has indicated that 20 units can be accommodated on site CUMW 2 and at 0.6 ha the site is wholly capable of accommodating this density – approximately 30 dwellings per hectare - prior to any constraints and opportunities testing.</p>			
20170	Support	Policy: 18		
034	Lucy Adamski		A008	
Detail	<p>Explicit support for optimising new housing development densities and thereby avoiding the profligate use of land.</p>			
20087	Support	Policy: 18		
209	Mr Peter Lamb		A025	
Detail	<p>We support the objectives of this policy which offer a flexible approach and ensures that design solutions respond to their site and surroundings, rather than to arbitrary density targets.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20155	Support	Policy: 18		
223		Taylor Wimpey UK Limited		Ao26
Detail	Taylor Wimpey UK Limited supports the policy provision of facilitating higher densities within Carlisle, Brampton, Longtown and the larger village centres that have good access to public transport and a range of local services and facilities. Taylor Wimpey UK Limited considers that it is beneficial to maximise the use of land when delivering sustainable residential developments.			
20303	Support	Policy: 18		
234	S Nicholson			Aoo8
Detail	Explicit support for optimising new housing development densities and thereby avoiding the profligate use of land.			
20181	Support	Policy: 18		
225	JR & JA Workman			Aoo8
Detail	Explicit support for optimising new housing development densities and thereby avoiding the profligate use of land.			
20351	Comment	Policy: 18	5.30	105 & 106
154/26/27	Mr Bryan Craig			
Detail	Why are the density figures removed from one paragraph and not the other? Paragraph 5.30: Can there be a final line on achieving high quality development with adequate outside space to ensure the health and wellbeing of the occupants.			
20565	Objection	Policy: 18	5.30	106
193	Sue Tarrant			Clerk to Wetheral Parish Council
Detail	Stress the importance of reflecting vernacular architecture and avoiding sameness within new developments. The Continent of Europe is a good example. In Britain builders maximize profits through multiplying virtually identical house types			
20247	Objection	Policy: 19		
033	Matthew Good			Home Builders Federation
Detail	The HBF still considers Rep No 0062 - former Policy 22 Affordable Housing still to be valid.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20536	Objection	Policy:	19	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Rep also submitted under Policy 22 [20537] Policy 19 - Affordable Housing The Sixth Report of the House of Commons Environment, Food and Rural Affairs Committee - Session 2013–14 states: “Rural communities pay higher council tax bills per dwelling, receive less government grant and have access to fewer public services than their urban counterparts. The Government needs to recognise that the current system of calculating the local government finance settlement is unfair to rural areas in comparison with their urban counterparts and take action to reduce the disparity. This ‘rural penalty’ is not limited to public services, it is also acute in many areas of infrastructure, not least the provision of high-quality broadband.” Policy 22 should recognise this gross imbalance and require a greater emphasis the provision of affordable housing, or financial commutation, with regard to the rural area. This consideration is especially important in the more remote rural areas, in order to offset a paucity of readily accessible essential services that are taken for granted by the urban population.</p>			
20723	Comment	Policy:	19	
194	Michael Barry	Cumbria County Council		
Detail	<p>It is considered that the policy approach should aid the delivery of necessary affordable homes across Carlisle.</p>			
20594	Comment	Policy:	19	
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	<p>A sum is required – to be allocated to the specific Parish or village specifically, currently the policy is general.</p> <p>Rural communities- small scale development to reflect local styles/ There is also no mention of the housing needs surveys in specific locations or identified local need.</p>			
20171	Comment	Policy:	19	
034	Lucy Adamski			Aoo8
Detail	<p>Welcome the acceptance of the preparation of financial appraisals to assist in the determination of the level of affordable housing contribution that is viable on any given site. Comment – whilst paragraph 5.38 now recognises the principle of development appraisals in respect of viability testing for affordable housing contributions, it is nonetheless still considered wise to adopt a standard tool to avoid potential inconsistencies. Again, therefore, the Three-Dragons model, which is used across Greater London, is one such option. http://www.threedragons.co.uk/index.asp</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20088	Objection	Policy:	19	
209	Mr Peter Lamb			A025
Detail	<p>We do not support the element of this policy which states that within Zone A 'all sites of 5 units and over will be required to provide 30% of the units as affordable housing'. It is not necessarily viable or appropriate in design terms to include affordable provision within every site, as this policy would indicate. We therefore submit the following modification:</p> <p>'where appropriate and viable, provision of affordable housing on sites of 5 units and over should be considered'</p>			
20156	Comment	Policy:	19	
223		Taylor Wimpey UK Limited		A026
Detail	<p>Taylor Wimpey UK Limited accepts the affordable housing requirements of the plan to comprise 25% in Zone A and 30% in Zone B on the basis of the assumption made in the Council's Viability Assessment. However, Taylor Wimpey UK Limited reserves the right to present further information on affordable housing requirements at a later stage in the plan preparation process.</p> <p>Policy 19 states that where intermediate housing is to be provided at a discounted market value, a discount of 30% will be sought and the discounted sale will be required to be in perpetuity. Taylor Wimpey UK Limited question where the evidence for the 30% discount has come from and request that this is provided to ensure that the viability of future residential developments accords with the Framework [para. 173].</p> <p>Taylor Wimpey UK Limited supports the tenure split of affordable housing on social rented and intermediate tenure to be determined at the time and welcomes the flexibility.</p>			
20182	Comment	Policy:	19	
225	JR & JA Workman			A008
Detail	<p>Welcome the acceptance of the preparation of financial appraisals to assist in the determination of the level of affordable housing contribution that is viable on any given site.</p> <p>Comment – whilst paragraph 5.38 now recognises the principle of development appraisals in respect of viability testing for affordable housing contributions, it is nonetheless still considered wise to adopt a standard tool to avoid potential inconsistencies. Again, therefore, the Three-Dragons model, which is used across Greater London, is one such option. Http://www.threedragons.co.uk/index.asp</p>			
20304	Comment	Policy:	19	
234	S Nicholson			A008
Detail	<p>Welcome the acceptance of the preparation of financial appraisals to assist in the determination of the level of affordable housing contribution that is viable on any given site.</p> <p>Comment – whilst paragraph 5.38 now recognises the principle of development appraisals in respect of viability testing for affordable housing contributions, it is nonetheless still considered wise to adopt a standard tool to avoid potential inconsistencies. Again, therefore, the Three-Dragons model, which is used across Greater London, is one such option. http://www.threedragons.co.uk/index.asp</p>			

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

20331 Comment Policy: 19

062 Church Commissioners for England A013

Detail

We do not contest that affordable housing is an important element of the Local Plan and that there is a need which the Council will aim to meet during the Plan period. However, it is vital for a Local Planning Authority to give consideration to the cumulative impact of policies such as design standards, affordable housing, infrastructure requirements (CIL) and sustainability measures, among others.

The Viability Testing Local Plans (June 2012) paper seeks that Local Plans provide a high level assurance that the policies within the plan are set in a way that is compatible with economic viability of the development required within the plan.

Furthermore, the Council should avoid opportunities to impede on the delivery of development and its associated viability. Reference should also be made to the RICS Guidance Note 'Financial Viability in Planning' (August 2012); recommended good practice guide.

Consideration is also necessary in terms of the treatment of threshold land values - the value at which a typical willing landowner is likely to release land for development added to landowner expectations. The NPPF requires Local Planning Authorities to take account of the level of 'competitive return' to a willing landowner and all additional costs. If not addressed there is a risk of a low level of housing land release and an unsound plan which is unable to meet its housing targets over the plan period.

What is clear is that ensuring the viability of housing sites is critical to housing delivery over the plan period. The opportunity to negotiate the numbers of affordable units with the Council, in respect of the viability of sites coming forward, is crucial to take account of site specifics and we support that there is this opportunity included within the Policy. Viability is a critical concern for all sites in the current economic climate. In particular though, viability is often marginal for smaller sites and, set against other requirements of the plan (open space provision, etc) a blanket affordable housing requirement is likely to be an obstruction to delivery on sites of a smaller scale.

This policy should be underpinned by reference to viability testing on a site-bysite basis. The Council need to prevent policy stifling the delivery of housing in the more rural areas and on smaller sites. On this basis, it is considered that the thresholds set out in the consultation document are too onerous, particularly in the more rural settlements (30% on units of 5 or more in Zone A). This should be amended to read 10-20% on 5 or more units; more in line with existing policy.

We do, however, support the removal of the site sizes as a way for the Council to impose affordable housing requirements, which is currently present in existing Local Plan policy (Policy H5).

Detailed comments on viability will be submitted to the Carlisle Viability Consultation, under separate cover.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20128	Objection	Policy:	19	
218	Executors of Mrs M Coulson			A013
Detail	<p>The affordable housing policy must be set within the context of ensuring that sites - which are suitable and available for development - are also deliverable and viable and not subject to unnecessary policy constraints.</p> <p>In accordance with paragraph 173 of the NPPF, it is important that sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The June 2012 Local Housing Delivery Group Paper 'Viability Testing Local Plans' defines viability as:</p> <p>"an individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the landowner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered."</p> <p>The paper seeks that Local Plans provide a high level assurance that the policies within the plan are set in a way that is compatible with economic viability of the development required within the plan. Consideration is also necessary in terms of the treatment of threshold land values – the value at which a typical willing landowner is likely to release land for development added to landowner expectations. The NPPF requires Local Planning Authorities to take account of the level of 'competitive return' to a willing landowner and all additional costs. If not addressed there is a risk of low level housing land release and an unsound plan.</p> <p>Taking this into consideration, it is important that local planning authorities give consideration to the cumulative impact of policy obligations such as location, housing mix, affordable housing, housing density, design standards and sustainability requirements.</p> <p>We therefore strongly object to the Council's approach to seek 30% affordable housing on all schemes of 5 units and over within Zone A. Whilst we acknowledge the need to seek an element of affordable housing on larger residential sites it is essential that smaller sites, which play a key role in meeting housing delivery targets, are encouraged to come forward.</p> <p>Furthermore, it is vital that the policy recognises that the ability of development proposals to contribute towards meeting affordable housing targets depends upon a range of factors including market conditions, size of the development and other associated costs specific to individual sites. It is therefore crucial that a degree of flexibility is incorporated into the policy and we suggest the text is amended to include some recognition of this. With this in mind we also suggest the final agreed figure is set as a 'target' rather than a 'requirement'.</p>			
20566	Objection	Policy:	19	107
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>A sum is required – to be allocated to the Parish or village specifically, currently the policy is general.</p> <p>ALL AFFORDABLE HOUSING BUILT AS A RESULT OF THE 25% ALLOCATION MUST BE WITHIN THE area of the settlement affected</p> <p>There is a shortage of affordable housing especially bungalows for the elderly</p> <p>Rural communities- small scale development to reflect local styles/ There is also no mention of the housing needs surveys in specific locations or identified local need.</p> <p>Most rural communities prefer small scale developments</p> <p>There is a shortage of affordable housing especially bungalows for the elderly</p>			

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20352 Comment Policy: 19 5.36 - 37 108

154/26/27 Mr Bryan Craig

Detail I am not sure of the zones and how were these agreed.

20332 Objection Policy: 20

062 Church Commissioners for England A013

Detail We have previously questioned the viability of retaining the element of the policy which refers to 100% affordable housing sites. In the past, Local Planning Authorities have relied too heavily on affordable housing being delivered on 'exception sites' and this has led to an undersupply as limited rural exception sites have been brought forward. Our experience of this tells us that the value of the site does not often present a competitive return to the landowner, as identified in the NPPF.

As set out in paragraph 5.68 of the consultation document, a reduction in HCA grant funding means that new ways to bring forward affordable housing needs to be explored. We therefore fully support the element of the Policy where it states that a proportion of market housing can be introduced into such schemes to ensure their viability and deliverability. This is also in accordance with the NPPF as paragraph 54 states that "Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs".

However, it is important to note that this will still remain a limited way to provide affordable housing through the Local Plan as landowners will need to make an acceptable return from the sale of their land. Without market value properties, it is assumed that landowners will be reluctant to release land for development for "exception" sites if it does not meet expectations and release some capital. 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.

Furthermore, we do have concerns that, following the removal of development limits in the smaller towns and villages there will be confusion as to what constitutes sustainable market housing development as set out in paragraph 55 of the NPPF and those sites which should be considered suitable for rural exception sites.

20538 Comment Policy: 20

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail The Parish Council welcomes criteria 1-4 of the policy, especially the change of emphasis from local 'people' to local 'need', as being protective but not restrictive of small rural exception sites. However: as this policy addresses 'exceptions' it would be appropriate to incorporate specific reference to The Community Right to Build, as enshrined in the Localism Act 2011.

Inclusion of reference to this right would relate directly to policy S1 of the draft LP which states that Carlisle City Council will always work proactively communities, jointly to find approvable solutions for developments that improve the economic, social and environmental conditions of the area.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20724	Comment	Policy:	20	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1009 and comments were noted. Comment submitted: Policy 20 sets out an appropriate framework against which proposals for rural exception sites can be considered and the approach taken is welcome. In particular, the policy's allowance for a small proportion of open market housing upon "exceptions sites" in order to provide cross subsidy where it can be shown that viability is a key constraint will assist the delivery of exceptions sites, at a time when Government grant support for affordable housing is diminishing.</p>			
20670	Objection	Policy:	20	112
104	Emily Hrycan	English Heritage North West		
Detail	<p>The Plan should refer to the need for new development to relate well to existing development and to develop locally distinctive and high quality areas. This would closely reflect the requirements of the NPPF.</p> <p>A new criterion should be inserted: "The development should have due regard to existing development, enhances the public realm and contributes to delivering locally distinctive and high quality places".</p>			
20567	Objection	Policy:	20	112
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>This is very weak any developer will always use one of the exception criteria. Need to define how close to the nearest settlement.</p>			
20333	Comment	Policy:	21	
062		Church Commissioners for England	A013	
Detail	<p>It is considered that this policy is in accordance with previous (Annex A of PPS7) and current (NPPF) national planning guidance. We therefore support, in principle Policy 21, particularly the flexibility introduced as to what constitutes a rural worker (as set out in paragraph 5.71). We also fully support the amendment to paragraph 5.75 to read "6 months marketing" rather than 8 months, so not to instil such an onerous requirement in respect of the removal of a condition, if a removal of the condition is deemed necessary by the owners. However, it may be considered even more appropriate to remove the requirement for marketing the property altogether.</p>			
20725	Comment	Policy:	21	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1010 and comments were noted. Comment submitted: While giving recognition to the importance of meeting the housing and economic needs of rural communities, both the NPPF and the Cumbria Sub Regional Spatial Strategy are clear that it should be the exception for new housing to be located within open countryside locations. This policy provides a mechanism whereby proposals for rural workers accommodation can be adequately considered and is considered to be broadly acceptable.</p>			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	
20539	Objection	Policy:	21	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>It would be both appropriate and advisable for policy criteria 4 to include a requirement that the proposed house should be of a size, scale and design commensurate with the employment criteria of the agricultural work related to the occupancy, e.g.:</p> <p>4. the house would be appropriate in terms of size, scale and design for its location and with the employment criteria of the relevant agricultural work.</p> <p>In the interest of clarity and for the avoidance of doubt it may be prudent to strengthen paragraph 5.75 to require an 'unequivocal' demonstration that the 2 criteria have been met, e.g.: "...the removal of such an occupancy condition will only be permitted where it can be unequivocally demonstrated that:"</p>			
20353	Objection	Policy:	21	5.72 116
154/26/27	Mr Bryan Craig			
Detail	<p>The 2 year clause should be removed as it is too restrictive and will prevent start- up businesses with a requirement for living on site in rural areas.</p>			
20726	Comment	Policy:	22	
194	Michael Barry	Cumbria County Council		
Detail	<p>The proposed policy approach to the consideration of conversion proposals and replacement dwellings reflects the guidance set out within the NPPF. This seeks greater flexibility to enable the appropriate conversion of rural buildings to alternative uses.</p> <p>While the approach proposed is appropriate, it is also suggested that the policy could also recognise opportunities to use buildings for commercial/live work purposes ahead of residential uses to reflect permitted development rights. This would reflect the traditional role of these buildings and could help facilitate the diversification of the rural economy.</p>			
20537	Objection	Policy:	22	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Rep also submitted under Policy 19 [20536]</p> <p>Policy 19 - Affordable Housing</p> <p>The Sixth Report of the House of Commons Environment, Food and Rural Affairs Committee - Session 2013–14 states:</p> <p>"Rural communities pay higher council tax bills per dwelling, receive less government grant and have access to fewer public services than their urban counterparts. The Government needs to recognise that the current system of calculating the local government finance settlement is unfair to rural areas in comparison with their urban counterparts and take action to reduce the disparity. This 'rural penalty' is not limited to public services, it is also acute in many areas of infrastructure, not least the provision of high-quality broadband."</p> <p>Policy 22 should recognise this gross imbalance and require a greater emphasis the provision of affordable housing, or financial commutation, with regard to the rural area. This consideration is especially important in the more remote rural areas, in order to offset a paucity of readily accessible essential services that are taken for granted by the urban population.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20334	Comment	Policy: 22		
062		Church Commissioners for England	A013	
Detail	<p>Whilst we support the inclusion of Policy 22 in the Local Plan, it is considered that the policy, as it stands, would lead to many traditional, underused agricultural buildings being susceptible to deterioration and falling into a state of disrepair due to the policy being too restrictive.</p> <p>The policy, including its explanatory text, excludes a large number of structurally sound, traditional agricultural buildings which are capable of conversion for residential use from development, due to 'sustainability tests' that are associated with the more isolated rural locations.</p> <p>Underutilised, traditional buildings are rural assets and are a non-renewable resource. Intelligently managed change can be necessary if assets are to be maintained for the long term. To ensure the conservation and long term protection of the unused traditional agricultural buildings, their conversion into a suitable alternative use (e.g. residential use), should be supported.</p> <p>It is not viable to leave buildings in poor, underused conditions as this would inevitably lead to their deterioration over time due to lack of use. It is important for the Council to acknowledge that, if such buildings are not converted, the district could end up losing its historic (albeit not designated) rural buildings through dereliction. Keeping buildings in an appropriate use also avoids the consumption of building materials and energy and the generation of waste from the construction of replacement buildings. We therefore propose the removal of the final sentence from Policy 22 and paragraph 5.84 of the supporting text.</p> <p>We also strongly oppose the inclusion of the final sentence of Policy 22. The new permitted development rights adopted in May 2013, and those to be implemented on 6 April 2014, support the future change of use of rural buildings. Therefore, in line with the intentions set out by Central Government, in respect of delivering housing, particularly in rural areas, Policy 22 should be amended to reflect this.</p>			
20354	Objection	Policy: 22	117	
154/26/27	Mr Bryan Craig			
Detail	This policy is too restrictive and should follow the NPPF more closely. There is no mention of houses of exceptional quality and innovative design as in NPPF 55/4.			
20568	Support	Policy: 22	119	
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Agree			
20727	Objection	Policy: 23		
194	Michael Barry	Cumbria County Council		
Detail	<p>Suggested Change:</p> <p>Point 5 of this policy should be amended to state: "Adequate access and appropriate car parking are provided."</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20671	Objection	Policy: 23	119	
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 delivering a number of other planning objectives.</p> <p>Any proposal that involves conversion of a heritage asset should be subject to the same criteria whether this is to a dwelling, office or shop. It is considered that there is no need for additional policy. Rather all the criteria listed should automatically be within the heritage assets policy.</p> <p>The principle of enabling development should be inserted within the historic environment policies as it should not just apply to housing but other uses as well. The policies covering the different types of heritage assets (see comments below) should be the main policy used to assess them impact of proposals on the historic environment. The conversion of any heritage asset and new development within its setting should be adequately covered by the other policies and therefore it is considered that there would be no need for this policy.</p> <p>Therefore, this policy should be deleted as there is a separate section on the historic environment.</p>			
20728	Objection	Policy: 24		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1013 to which no amendments were made. Background information and suggested change re-submitted. Point 6 of this policy should be amended to state: "Adequate access and appropriate car parking are provided."</p>			
20569	Objection	Policy: 24	123	
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Should be discouraged. If granted development should fit in with the local environment</p>			
20355	Comment	Policy: 24	123	
154/26/27	Mr Bryan Craig			
Detail	<p>In the first line of this policy could the word 'will' be changed for 'may'.</p>			
20570	Objection	Policy: 25	126	
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Should be discouraged. If granted development should fit in with the local environment</p>			
20356	Comment	Policy: 26	128	
154/26/27	Mr Bryan Craig			
Detail	<p>Can we add a fifth paragraph about preserving the external character of the Building and Street Scene? This is only partially covered in 5.131.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20729	Objection	Policy:	27	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1012. No changes were made. Amended comments and suggested change submitted.</p> <p>Suggested Change: Following the text; "care will be supported." add "opportunity to secure affordable extra care housing schemes as part of the wider affordable housing mix on development sites will be sought where it is considered to meet needs and the site is appropriate". Following the text; "Supported by the Council." add "It will be expected that new homes will provide safe and suitable access for all people";</p>			
20335	Objection	Policy:	27	
062		Church Commissioners for England	A013	
Detail	<p>It is vital that the Council stipulates in its Local Plan that the final housing numbers for the district do not include provision for institutional housing (e.g. nursing homes, student accommodation etc). This should be an additional figure to the housing need for the district.</p>			
20080	Support	Policy:	27	
207		McCarthy & Stone Retirement Lifes	A024	
Detail	<p>We commend the council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its aging population. Additional supporting text and documentation sent - Housing in Later Life Toolkit</p>			
20730	Objection	Policy:	28	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1013. Amendments were made to Policy title and Criterion 5. New comments and suggested change submitted. Suggested Change: An additional criteria should be provided to the policy, this stating: All sites should look to reflect the principles of inclusive design to help those with disability to access sites.</p>			
20540	Objection	Policy:	28	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>With reference to criterion 8 of the policy; in the interests of clarity and for the avoidance of doubt it would be appropriate to use the term 'ancillary' (i.e. providing necessary support to the primary activities or operation), rather than 'additional' (i.e. added, extra, or supplementary to what is already present or available). Also in the interests of clarity and for the avoidance of doubt; it would be appropriate to include a criterion explicitly prohibiting the carrying out of industrial activities/processes, rather than relying only upon the term 'business uses'. Business uses might, for example, include the parking of a van and perhaps a small quantity of materials; whereas the disposal of waste materials or cable stripping would constitute industrial processes.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20672	Objection	Policy:	28	133
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 delivering a number of other planning objectives. The criteria listed appears to be very comprehensive. However, it does not appear to include reference to the historic environment which is significant in the district of Carlisle.</p> <p>Insert reference to "historic assets" within the list of criteria.</p>			
20731	Objection	Policy:	30	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1019. Amendements were made. Modified comments submitted. Suggested Change: The Infrastructure Delivery Plan prepared to support the Local Plan will require continued development as more understanding about the infrastructure requirements of development proposed within the plan emerge. The City Council must work closely with the County Council to ensure that the final infrastructure delivery plan is robust and reflects the principles of the "Duty to Cooperate". Given their importance the IDP should recognise potential infrastructure requirements of proposals in Carlisle City Centre and to the South of City.</p>			

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STAGE 2 REPRESENTATIONS

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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.

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.

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.

20701 Objection Policy: 30 6.2 - 6.3 140

095 Sabaa Ajaz United Utilities

Detail suggested rewording:
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 may be necessary in some instances.

Para 6.3: Key infrastructure that the Council would expect to see coordinated with the delivery of development includes...:
[Bullet points remain]

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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: Under "Travel Plans & 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".</p> <p>Within the supporting paragraphs to the policy should be made to the importance of safe walking routes to school.</p>			
20307	Support	Policy:	31	
096	Rob Naples	Northumberland County Council		
Detail	<p>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.</p>			
20358	Objection	Policy:	31	
154/26/27	Mr Bryan Craig			
Detail	<p>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.</p>			
20092	Comment	Policy:	31	
175	Cllr Hugh McDevitt	County Councillor Denton Holme		
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 & 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>			

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20384 Comment Policy: 31

241 Mrs Dallas Brewis Cycle Carlisle

Detail This policy talks about detailed proposals & 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.
The council does not seem to have a travel plan.

Additional comments sent by email rec'd 13/04/14

20096 Comment Policy: 31

210 Cllr Southward

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.

20114 Objection Policy: 31

214 Mr Nicholas Bethune Campaign for Borders Rail

Detail 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.
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.
Please refer to our separate Consultation Response document for comprehensive details and background to this and our other comments.

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.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20234	Objection	Policy:	32	
o88	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>			
20733	Objection	Policy:	32	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1021. No amendements 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>			
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>			
20385	Objection	Policy:	32	
241	Mrs Dallas Brewis	Cycle Carlisle		
Detail	<p>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.</p> <p>Additional comments sent by email rec'd 13/04/14</p>			
20734	Comment	Policy:	33	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1022. Comments re-submitted.</p> <p>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.</p>			

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20613 Comment Policy: 33

273 Nicholas Kittoe

Detail

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.

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.

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.

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.

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: 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 & Water Management Act 2010".</p>			
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. '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. 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: '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>			
20572	Comment	Policy:	35	6.50 155
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 & Wetheral- The City Council should be more insistent</p>			
20359	Comment	Policy:	35	6.50 155
154/26/27	Mr Bryan Craig			
Detail	<p>Can Dalston be added to this as it was identified in the recent Story application?</p>			

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> <ul style="list-style-type: none"> Transport improvements (including public transport) and its resulting maintenance; Car parking; Footpaths and cycle ways; Drainage infrastructure; Heritage assets; Flood risk and surface water management; Waste management; Broadband and communication networks; Low carbon energy and renewable energy infrastructure. Affordable housing; Education provision; Community facilities (including health, police); Local employment and training initiatives; Adult social care, Fire service and community safety; Green Infrastructure, including public open space, play areas and sports facilities; Nature conservation, biodiversity enhancement and mitigation measures; Environmental improvements; Public realm (including public art). 			
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.</p> <p>We are particularly supportive of the recommendation that:</p> <p>"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>			
20235	Objection	Policy:	36	
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>The lack of clarity around CIL has been noted in rep No 20234 Policy 32</p>			

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"> • Policy 19 'Affordable Housing'; • Policy 30 'Delivering Infrastructure'; • Policy 31 'Sustainable Transport'; • Policy 33 'Broadband Access'; • Policy 39 'Development Energy Conservation and Efficiency'; and, • Policy 63 'Open Space' <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>			
20058	Comment	Policy:	36	
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p> <p>Should not be granted unless the promotion and support of road passenger Transport is achieved.</p>			
20249	Objection	Policy:	36	
033	Matthew Good	Home Builders Federation		
Detail	<p>The HBF still considers Rep No 0063 - former Policy 33 Delivering Infrastructure still to be valid.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
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.			
20673	Objection	Policy: 36	156	
104	Emily Hrycan	English Heritage North West		
Detail	<p>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.</p> <p>The Policy would benefit from reference to the historic environment including the above.</p> <p>The Policy should be amended to include reference to “historic environment including heritage at risk” as well as archaeology.</p>			
20603	Comment	Policy: n/a		
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	<p>General Comments:</p> <p>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.</p> <p>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.</p> <p>The infrastructure must be in place for the expansion of the city, in particular on the South side – Dalston Road/Peter Lane.</p> <p>Local councils should have a robust strategy, integrated with the County Council, to ensure that the developers shoulder their appropriate economic portion.</p>			

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 Overview comments

Public Transport Accessibility

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.

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.

Green Infrastructure connections (footpaths/cycle ways)

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.

Health Facilities

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.

Planning Obligations

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'.

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.

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

20607 Comment Policy: n/a

271 Toby Harling

Detail 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 Durranshill. 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]

- 01 Etterby Scour "Footpath"
- 02 Sheepmount – Willowholme Road
- 03 Stony Holme – Memorial Bridge
- 04 Willowholme Road – Hadrian's Cycleway Link
- 05 Hammonds Pond
- 06 Lowry Hill Road – Kingmoor Road
- 07 Lowry Hill Road – Kingstown Broadway
- 08 Dalston Road (Pirelli Factory) to Caldew Cycleway Link
- 09 Dalston Road (Pirelli Factory) – Winscale Way
- 10 Harraby Green Road – Petteril Bank Road
- 11 Stony Holme – Warwick Road
- 12 Melbourne Park – London Road
- 13 Cummersdale – Blackwell Link
- 14 Port Road Business Park to Waverley Viaduct link
- 15 Whiteclosegate – Rickerby Park Link
- 16 Currock Bridge
- 17 Waverley Viaduct

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STAGE 2 REPRESENTATIONS

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Stage 2 Chapter 07

20596 Comment Policy: 35 155

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail Related directly to 3.37

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.

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.

20738 Objection Policy: 37

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 1026 and wording was amended. Comment re-submitted:
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.
Suggested Changes
It is suggested that the Local Plan has regard to the above study in the determination of planning applications.

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.

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>			
20219	Support	Policy:	38	
077	Mr Alan Hubbard	National Trust		
Detail	<p>The amendment to Criterion 4 to refer to 'settings' is noted, welcomed, and suitably addresses the concern previously raised by National Trust.</p>			
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>			
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>			
20571	Objection	Policy:	38	165
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Distance from residential property determined- should be min. 1500m</p>			
20595	Objection	Policy:	38	165
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	<p>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.</p>			

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.			
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.			
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)			
20741	Comment	Policy: 40		
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Representation No 1029 and amendements made. Stage 2 comment: We have no comment to provide on this policy.			
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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20685	Comment	Policy:	41	
097	Jessica Patten	Environment Agency		
Detail	<p>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:</p> <ul style="list-style-type: none"> - 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. 			
20742	Objection	Policy:	41	
194	Michael Barry	Cumbria County Council		
Detail	<p>No previous representation.</p> <p>The proposed policy appears appropriate, however it recommended that the text supported this policy be revised to help ensure its accuracy.</p> <p>Suggested Changes:</p> <p>In Paragraph 7.59 following "Lead Local Flood Authority (LLFA) revise the paragraph to state: "This has given the County Council new powers and duties for managing flooding from local sources, namely Ordinary Watercourses, surface water (overland runoff) and groundwater in the administrative area of Cumbria. (Date of April 2014 was associated with SAB but has now been postponed). One of the new roles of the County Council as LLFA will be to approve applications for drainage systems, in their capacity as SUDs Approving Body (SAB), and adopt, inspect and maintain SUDs in all new development over a prescribed threshold but date of introduction is unknown at present."</p>			

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

20703	Objection	Policy: 41	178	
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095	Sabaa Ajaz	United Utilities		
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Detail 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'.

Text:

'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:

- 1) a soakaway or some other form of infiltration system (using Sustainable Urban Drainage principles); or
- 2) an attenuated discharge to watercourse; or
- 3) an attenuated discharge to surface water sewer; or as an absolute last resort
- 4) an attenuated discharge to combined sewer.

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.

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.

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.

A discharge to groundwater or watercourse may require consent of the Environment Agency.

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.'

Justification Text

United Utilities requests that the following paragraphs are added to the justification text in light of the above suggested amendments.

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.

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.'

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 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.

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.

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.

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';

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.

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

20744 Objection Policy: 43

194 Michael Barry Cumbria County Council

Detail 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.

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.

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.

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.

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.

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.

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 & 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>			
20745	Comment	Policy: 44		
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1032 no amendements made. Stage 2 comment: We have no comment on this policy.</p>			
20060	Comment	Policy: 44		
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			
20574	Objection	Policy: 44		
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Change of use policy 44 – Facilities & services – It is important to consult Parish Councils</p>			

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

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.			
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.			
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.			
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.			

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

STAGE 2 REPRESENTATIONS

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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.

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.

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

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 16g).

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.

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

20754 Objection Policy: 54

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 1036 amendments made. Amended Comments and suggested change submitted:
 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. 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.
 Suggested Changes
 The name of this policy should be revised to state: Policy 54 - 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.

20676 Objection Policy: 54 213

104 Emily Hrycan English Heritage North West

Detail 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 to 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".

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.

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.

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.

20236 Objection Policy: 55

088 Elizabeth Allnutt Save Our Streets

Detail 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?
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

20677 Objection Policy: 55 213

104 Emily Hrycan English Heritage North West

Detail 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.

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.			
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.			
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.			
20237	Objection	Policy: 56		
088	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.			
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.			

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: 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. Enhancement to the significance of listed buildings as well as preservation should be equally promoted. 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: 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. Bullet 1 should be amended to read: "The significance of the heritage asset...."</p> <p>Demolition of listed buildings: 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. This policy does not accord with the NPPF, and needs to be amended. 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>			

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. 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>			

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

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

20674	Comment	Policy:	n/a	210
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104	Emily Hrycan	English Heritage North West		
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Detail

We welcome the inclusion of a section on heritage within the Plan. 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.

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.

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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 10

20756 Comment Policy: 60

194 Michael Barry Cumbria County Council

Detail Stage 1 Representation No 1040. Comments re-submitted with slight amendment.
Suggested Changes
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.

20005 Support Policy: 60 225

160/35 Mrs Catherine Leach Clerk to Bewcastle Parish Council

Detail 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.

RepNo	Status	Paragraph	Page	Stage 2 Map:
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.

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.

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 2oha 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 http://www.woodlandtrust.org.uk/mediafile/100083906/space-for-people.pdf .</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>			
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>			
20759	Support	Policy:	64	
194	Michael Barry	Cumbria County Council		
Detail	<p>Stage 1 Representation No 1044, amendements made. Stage 2 comment no supports the policy:</p> <p>The County Council welcomes the amendements made to this policy and has no further advice to provide with respect to this policy.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation	Agent	
20037 146/18 Detail	Support Policy: 64 Mr Ian Brodie Chapter 10: Policy 64; and Paragraphs	10.42 - 10.43 The Ramblers 10.42; 10.43 The Ramblers Association	238	fully support these as printed.
20760 194 Detail	Support Policy: 65 Michael Barry Stage 1 Representation 1045 of support. Stage 2: support re-submitted:	Cumbria County Council		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.
20143 170/45 Detail	Comment Policy: 65 Mr Nick Sandford 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.	The Woodland Trust		<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>
20686 097 Detail	Comment Policy: n/a Jessica Patten 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.	Environment Agency		
20216 077 Detail	Support Policy: n/a Mr Alan Hubbard The revised wording suitably addresses the concern previously raised by National Trust, the revised wording is supported.	National Trust		

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.

20029 Comment Policy: n/a

203 Robert Patterson

Detail SHLAA Ref HNO1 - Land Adjacent to The Whins, Heads Nook
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". 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. 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. Surely this application should be refused without more ado?

20668 Comment Policy: n/a 289 - 315

104 Emily Hrycan English Heritage North West

Detail 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.

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.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20783	Comment	Policy: n/a		BRAM1
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
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. 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. 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. 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. 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>			
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. Please see our previous comments below: 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. 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> <p>Suggest - Alter proposed allocation boundary as described above.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
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: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</p>			
20785	Comment	Policy: n/a		BRAM3
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
20786	Comment	Policy: n/a		BRAM4
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
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. 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. The site is also adjacent to a Grade II listed asset. This has not been identified. 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 that they will conserve those elements, which contribute to the significance of the listed buildings and their setting.</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.</p> <p>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> <p>Suggest - Alter proposed allocation boundary as described above.</p>			
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. 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"> 1. Serious consideration given to an existing brownfield site in the village. 2. further consideration given to the 2 areas on the Rural Masterplanning document. 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. 			

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.			
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.			
20658	Comment	Policy: n/a		BURG1
104	Emily Hrycan	English Heritage North West		
Detail	The site is within the WHS buffer zone. 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. 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. 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.			
20184	Objection	Policy: n/a		CA6o
225	JR & JA Workman			Aoo8
Detail	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. Suggest: Inclusion of site CA6o as a deliverable extension to housing allocation CARL4.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20003	Comment	Policy: n/a	292	CA60
197	Mr John Kidd			
Detail	<p>Telephone message regarding the designation at Beverly Rise. Main issues are:</p> <ul style="list-style-type: none"> - costs requires to put in measures to deal with noise from the M6 - Railway land in the vicinity - should be looking at existing vacant properties within the City before building new homes i.e. Lowther Street and Railway Tavern. 			
20070	Comment	Policy: n/a		CA73
043	Nigel Winter	Stagecoach		
Detail	<p>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.</p>			
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. 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 buildings and their setting.</p>			
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 & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</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 & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</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	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.			
20652	Comment	Policy: n/a		CARL10 & 11
104	Emily Hrycan		English Heritage North West	
Detail	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. 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.			
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.			
20771	Comment	Policy: n/a		CARL11
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.			
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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20653	Comment	Policy: n/a		CARL13
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. 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. It is advised that an assessment be undertaken prior to the site being put forward as a site allocation.</p>			
20773	Comment	Policy: n/a		CARL13
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
20774	Comment	Policy: n/a		CARL14
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
20066	Comment	Policy: n/a		CARL14
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>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
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. 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>			
20067	Comment	Policy: n/a		CARL15
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>			
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. 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>			
20775	Comment	Policy: n/a		CARL15
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
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.			
20777	Comment	Policy: n/a		CARL17
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1059. 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.			
20068	Comment	Policy: n/a		CARL18
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.			
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.			
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.			

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	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.			
20762	Comment	Policy: n/a		CARL2
194	Michael Barry	Cumbria County Council		
Detail	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.			
20780	Comment	Policy: n/a		CARL20
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1056. 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.			
20781	Comment	Policy: n/a		CARL21
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.			
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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
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.			
20763	Comment	Policy: n/a		CARL3
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1047. 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.			
20063	Comment	Policy: n/a		CARL4
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.			
20183	Support	Policy: n/a		CARL4
225	JR & JA Workman			Aoo8
Detail	Explicit support for the inclusion of the land north of Moorside Drive/Valley Drive (CARL4) as a housing allocation (page 265).			
20764	Comment	Policy: n/a		CARL4
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1049. 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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20765	Comment	Policy: n/a		CARL5
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1050. 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.			
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.			
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.			
20767	Comment	Policy: n/a		CARL7
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1052. 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.			
20768	Comment	Policy: n/a		CARL8
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1055. 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.			

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. 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.</p>			
20769	Comment	Policy: n/a		CARL9
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
20691	Support	Policy: n/a		CUD03
275	Cllr Allison			
Detail	<p>CUDO3 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.</p>			
20692	Support	Policy: n/a		CUD04
275	Cllr Allison			
Detail	<p>The comments on CUDO4 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.</p>			
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 & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20690	Support	Policy: n/a		CUMM1
275	Cllr Allison			
Detail	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.			
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 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>			
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 & Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
20790	Comment	Policy: n/a		CUMW2
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20129	Support	Policy: n/a		CUMW2
218	Executors of Mrs M Coulson			A013
Detail	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>			
20791	Comment	Policy: n/a		CUMW3
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
20130	Comment	Policy: n/a		CUW06
218	Executors of Mrs M Coulson			A013
Detail	<p>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.</p>			
20584	Comment	Policy: n/a	299	CUW06
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>Not allocated – Too large scale. Concerns regarding the limitation to expand the primary school, this should be considered when permitting large scale development.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
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.			
20695	Comment	Policy: n/a		DALS1
275	Cllr Allison			
Detail	DALS1 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?			
20792	Comment	Policy: n/a		DALS1
194	Michael Barry	Cumbria County Council		
Detail	Stage 1 Rep No 1067. 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.			
20071	Comment	Policy: n/a		HARK1
043	Nigel Winter	Stagecoach		
Detail	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.			
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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20006 184 Detail	Objection Mrs Andrea McCallum	Policy: n/a Clerk to Rockcliffe Parish Council	282	HARK1
	<p>- 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;</p> <p>- a lack of availability of school places exists;</p> <p>- lack of infrastructure exists in the area, i.e. No bus service.</p>			
20072 043 Detail	Comment Nigel Winter	Policy: n/a Stagecoach		HO01
	<p>Difficult to connect to passenger transport services.</p>			
20073 043 Detail	Comment Nigel Winter	Policy: n/a Stagecoach		HO02
	<p>Difficult to connect to passenger transport services.</p>			
20660 104 Detail	Comment Emily Hrycan	Policy: n/a English Heritage North West		HOUG1
	<p>The site is 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 and has not 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.</p>			
20794 194 Detail	Comment Michael Barry	Policy: n/a Cumbria County Council		HOUG1
	<p>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.</p>			

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>			
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:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</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:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			
20797	Comment	Policy: n/a		MOOR1
194	Michael Barry	Cumbria County Council		
Detail	<p>County Council comments see:</p> <p>Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20661	Comment	Policy: n/a		MOOR1
104	Emily Hrycan	English Heritage North West		
Detail	<p>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.</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>			
20798	Comment	Policy: n/a		RICK1
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
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. 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 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. 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. 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>			

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"> - The site is considered too large and out of keeping for a rural community such as Rockcliffe; - the site projects outside the natural village boundary into open countryside; - foul drainage systems are thought to be at capacity; - concerns raised over the existing road structure and its ability to cope with extra traffic. 			
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			
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			
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.			
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.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20030	Comment	Policy: n/a		SM01
044	John Cornthwaite			
Detail	<p>Some years ago the Cumberland County council recommended that the whole of site Ref SM01 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.</p> <p>I note that site SM01 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.</p>			
20684	Comment	Policy: n/a		WARW1
191	Ken Hind	Clerk to Hayton Parish Council		
Detail	<p>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.</p> <p>The Parish council endorses all these views submitted</p>			

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

20140	Objection	Policy: n/a		WARW1
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220	Mr Terrence Ridley			
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Detail

I originally raised my concerns to this potential site development in Dec 2013 and are reiterated here.

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.

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.

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).

The majority of residents use & 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.

I understand that the proposed development would be for 60+ private dwellings (which would be half the size again of the Hurley road Estate).

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'.

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 & 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.

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

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.

Also see rep No 20139 re habitat comments.

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 & 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>			
20074	Comment	Policy: n/a		WARW1
043	Nigel Winter	Stagecoach		
Detail	<p>This site is too far from the nearest bus route to attract custom, the walking distance is unattractive.</p>			
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 & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</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.</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.</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>			

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.			
20586	Comment	Policy: n/a	313	WB05
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – Concerns over flooding			
20588	Comment	Policy: n/a	314	WEo8
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	Not allocated – suitable as an alternative site			
20665	Comment	Policy: n/a		WETH1
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>			
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 & Waste, Other.</p> <p>Appendix C for Highways Comments.</p> <p>Appendix E for Strategic Education Advice.</p>			

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. 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>			
20803	Comment	Policy: n/a		WETH2
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p>			
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. The NPPF considers that any substantial harm to or loss to a Grade II* listed building including its setting should be wholly exceptional. 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. 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.</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>			
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: Appendix B for Flood, Historic Environment, Landscape, Minerals & Waste, Other. Appendix C for Highways Comments. Appendix E for Strategic Education Advice.</p>			

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 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.

Include a map showing line of railway route to be safeguarded, namely:

(a) Line from Mossband Junction to Longtown MoD, currently in use.

(b) Line from Longtown MoD to Longtown, currently disused.

(c) Line from Longtown to Kershopefoot/Scottish border, currently disused.

(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)

20077 Support Policy: n/a

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.

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 General

20805 Comment Policy: n/a

194 Michael Barry Cumbria County Council

Detail On April 29th 2014 a workshop was held with members of Carlisle Local Committee with the County Council.

The main feedback from this meeting is recorded below:

- There was an appreciation that infrastructure planning was important in ensuring that the effects of developments can be considered and a strategy to deliver mitigation can be implemented via an Infrastructure Delivery plan.
- Members appreciated the need for a strategic route based strategy when considering how development can be accommodated within the highway network through improvements.
- Members considered that to deliver necessary strategic infrastructure, CIL will be important due to limitations of S106 and S278 in addressing the wider effects of development.
- A Member expressed a view that sites should be clearly deliverable to reduce the risk of situations where allocated or permitted sites do not emerge.
- A Member questioned the deliverability of the proposed District Centre at Morton.
- Members questioned the strength of the evidence underpinning the housing requirement and gave the view that this needs to be up to date and robust.
- There was a view that school projections needs to be constantly reviewed to ensure evidence remains up to date.
- A Member expressed concern about the effects of new housing development creating additional traffic and congestion through Wetheral.
- A Member expressed concern about the effects of new housing development creating additional traffic and congestion through Brampton.
- A Member expressed concern about the effects of new development on the capacity of schools at Wetheral and Scotby.
- There was concern about the proposed effects of sites CARL8 and CARL13 on congestion on Burgh Road, and, in combination with other development, at Caldewgate.
- A Member expressed some concern about the possible highways and transport effects of additional retail on the site of Caldew Riverside.
- Members wished to ensure that the plan gives sufficient weight is given to sustainable transport (i.e. Paths and cycleways) and the ability of disabled people to access key services and infrastructure.
- Members wished to ensure that sites which are currently in employment use are not restricted from alternative uses in the future should operations on existing operations cease.
- A Member wished to ensure that the proposed development to the South of Junction 44 (CARL 1 and CARL 2) would not impinge on the playing fields at James Rennie school.
- A Member gave the view that the CNDR has been very successful. It was considered that any further road infrastructure needed to support growth to the south of the City should be considered alongside proposals for a growth there.
- There was also a view that some new developments contain an internal road network of new housing developments not being wide enough which can cause increased maintenance costs.
- There was concern about the possible combined effects of development in South East Carlisle and longer term development at the south of the City on the highway network and concern about how this can be successfully mitigated using S278 and S106 alone. The member gave the view that CIL is likely to be necessary to mitigate the effects on the highway.

Sum up

- At the conclusion of the workshop officers were advised that the main feedback from local members is that CIL will be important to achieve the delivery of sustainable development in Carlisle.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees>Contact	Organisation		Agent
20378	Comment	Policy:	n/a	
005	Paul Barton			Clerk to Dalston Parish Council
Detail	The Parish Council was disappointed that a previous Rural Master Planning document for Buckabank was not included in the main Dalston's Rural Master planning document, we have not been given a reason as to Why Buckabank should not be included in this document. To rectify this We would ask that Appendix 3 be added to the Dalston's Rural Masterplanning document to make it more comprehensive.			
20021	Comment	Policy:	n/a	
014	Angela Atkinson			Marine Management Organisation
Detail	[Previous comment 0029] The MMO is responsible for issuing marine licences under the Marine and Coastal Access Act 2009. We also issue consents under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts and are a Statutory Consultee to the Planning Inspectorate for relevant Planning Act developments (Nationally Significant Infrastructure Projects). A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered. We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible.			
20622	Comment	Policy:	n/a	
080	Mike Downham			Carlisle Food City Steering Group
Detail	<p>We suggest that it's vitally important for Carlisle not only to keep abreast of the rapidly increasing recognition of the importance of food in sustainable development, but also to take advantage of the current momentum of the strong partnership between the public, community and private sectors in relation to food, and of the unique opportunity of its large rural area relative to its population, - so that it can get ahead and demonstrate a progressive and sustainable food culture to other cities.</p> <p>With this in mind, we attach for your reference a draft report by Sustain "Planning sustainable cities and food growing" (please note that this is a near-final draft version, and should not yet be distributed widely), and also a paper "Food growing and planning" about the experience in Brighton, which has been leading nationally in this field.</p> <p>You may feel that the amendments we have suggested above are adequate, or that others are needed, to ensure that the Carlisle Local Plan is able to proactively encourage debate on the best ways to implement its strategy in relation to food. Questions needing debate and development include:</p> <ul style="list-style-type: none"> - Should space for community food growing be classified under "play" or "open space"? - Should an Advisory Note on community food be made available to all developers at the point of application (see attached Advisory Note used in Brighton)? - Should there be a portfolio of community benefit 106's to cover play, open space, community buildings, food-growing space? - And other issues that you or others might identify. <p>[all additional information submitted in further emails].</p>			

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

20604 Comment Policy: n/a

o83 The Coal Authority

Detail Surface Coal Resources and Prior Extraction

As you will be aware, the Carlisle District Council area contains coal resources which are capable of extraction by surface mining operations in the north and west of the plan area

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal.

Coal Mining Legacy

As you will be aware, the Carlisle District Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Within the Carlisle District Council area there are approximately 331 recorded mine entries and around 10 coal mining related hazards have been reported to The Coal Authority. In addition there are other mining legacy features in the north and west of Carlisle.

Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20226	Comment	Policy:	n/a	
o88	Elizabeth Allnutt	Save Our Streets		
Detail	<p>Many of the comments submitted in responses to earlier consultations on the Local Plan and the City Centre Master Plan have not been incorporated into changes in the latest version. Although some of the details in them may be inappropriate in a long term planning document, they are still valid and relevant and still part of SOS's response. Only new points are commented on unless SOS feels that the importance of the issues warrants a second airing. This response should therefore be read in conjunction with earlier SOS responses. The absence of comment does not mean that SOS supports the latest version of the Plan.</p> <p>There are several outstanding issues which are pertinent to long-term planning decisions and which may well have repercussions on the future of Rickergate.</p> <ul style="list-style-type: none"> - The Cumbria Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP). The Cumbria LEP, unlike many other LEP's has not put this out for general consultation. This document will be a major plank for the future of all Cumbrian local authorities and they will have to abide by the Duty of Cooperation and take heed of what this Strategy contains when drawing up their Local Plans. If there has been no public feedback on the LEP Strategic Economic Plan, there should be a major concern about the sustainability aspects of including the contents and conclusions of the SEP into the Local Plan. It is to be hoped that the local authorities would exert some pressure on the LEP to consult about the SEP in the interests of sustainability as well as accountability - The master plan for Carlisle South which would provide more detail on how these plans would progress and their impact on the city and district as a whole. - Carlisle City Council's decision on whether to adopt a Community Infrastructure Levy (1.19). This will have major bearings on large scale developments such as are proposed in Carlisle South - SOS note that the City Centre Master Plan (CCMP) has been made available for comment, and has responded to the consultation on this. It would be useful to have access to the consultation responses. While these may have been publicly available at some time, I would have expected them to be accessible from the Local Plan page on the City Council's web site so that anyone seeking background information could view them easily. SOS would reiterate here that the CCMP is inadequate in that it provides nothing more than the very broadest of development proposals for the City Centre. 			
20223	Comment	Policy:	n/a	
o89	Elizabeth Allnutt	National Allotments Society		
Detail	<p>Some of the comments submitted in response to stage 1 [No's 0373 - 0383] by the National Allotments Society (NAS) have been incorporated into changes in the latest version, many have not. Those which have not been included are still valid and relevant and still part of response. Only new points are commented on unless it is felt that the importance of the issues warrants a second airing. This response should therefore be read in conjunction with the earlier NAS response. The absence of comment does not mean that NAS supports the latest version of the Plan.</p>			
20687	Comment	Policy:	n/a	
o97	Jessica Patten	Environment Agency		
Detail	<p>I note that the technical guidance supporting the National Planning Policy Framework has now been superseded by National Policy Guidance, which is accessible via the www.gov.uk website. References to the technical guidance should therefore be updated.</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20158	Support	Policy:	n/a	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	<p>Friends of the Lake District is pleased to see that our comments on Carlisle City Council's Preferred Options Stage 1 have mostly been taken into account in their entirety and in many places incorporated into the Preferred Options Stage 2 document. We are pleased to see strengthening of policies on Green Infrastructure, Landscape, Biodiversity, Open Space and Woodlands/Hedgerows.</p> <p>We consider that the planning policy laid out in Preferred Options Stage 2 document will provide protection for the natural environment and enable access to green and open spaces and sustainable transport for local residents. We are very encouraged to see that the policy document also encourages sustainable building practices and energy efficiency along with support for community and household renewables.</p>			
20373	Comment	Policy:	n/a	
121	Mike Fox	Brampton Economic Partnership		
Detail	<p>Same as original submission 0567</p> <p>Given that the span of the plan is through until 2030, it has little vision and drive for the future period, which will probably demonstrate the most major changes, since the 1970s in all aspects of the Carlisle communities life and development. The future seems to be determined by yesterday's tools against tomorrow's developments and aspirations.</p> <p>Does the Plan address sufficiently strongly the impact of an ageing population on the community and its needs?</p> <p>Is the plan overoptimistic on its assumptions for the growth of the population and the retention of younger members of the community, in the community and in appropriate employment? On the latter the Plan offers little prospect of a drive for new employment opportunities in tomorrow's world.</p> <p>Population growth carries with it demands for housing, which are addressed in the Plan, yet these may be overoptimistic, if the population is not retained due to lack of employment opportunities or growth in population is miscalculated.</p> <p>Overall there appears to be a Plan, which gives the LPA a tool to take decisions but does not engage its community or have the necessary vision or drive. Its essential focus is urban, rather than reflecting its whole environment and community.</p> <p>The Partnership believes there is a case for a shared dialogue with the Council to create a clear vision for Brampton and its surrounding for the next 17 years. Clearly any dialogue could involve other partners in the area and who may have approached you already. A collaborative approach should make for a more positive future for Brampton and the surrounding area.</p>			
20349	Comment	Policy:	n/a	
154/26/27	Mr Bryan Craig			
Detail	<p>Previous Policy 18 - Advertisement Can we do without this policy?</p> <p>All of the Document: There is some inconsistency in relation to the use of Capitals throughout the document</p>			
20528 E2	Comment	Policy:	n/a	
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	<p>Members of Brampton Parish Council feel that their comments are discounted within this consultation and through SHLAA. They would like to know why the City Council do not consider their comments to be important?</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20697	Comment	Policy:	n/a	
275		Cllr Allison		
Detail	Is there a Policy that defines the optimum size for a village beyond which it loses its essential character?			
The County Council's Local Area Plan is also out for consultation. It proposes that Dalston is of a size that may warrant a Service Hub. Given the above I would welcome the support of the City and County Councils in establishing such a facility for Dalston.				
20107	Comment	Policy:	n/a	
212		Mr Hans Landstroum		
Detail	The hotel on Victoria Viaduct in the City Centre has been clad in scaffolding for a considerable period of time with no tangible progress having been made. Efforts should be made to complete the works and return the building to use.			
20521 E2	Comment	Policy:	n/a	
269		Mr Andrew Mackay	Tullie House Museum & Art Gallery	
Detail	Tullie House Museum and Art Gallery Trust would like to declare its interest in acquiring Herbert Atkinson House on Abbey Street and 18 Castle Street. The Trust is in the process of creating a Development Plan which would see the current museum expand to take in Herbert Atkinson House and 18 Castle Street. The Trust aim to bringing the former property back into public use whilst developing land to the rear of the property (currently the garden) to provide additional museum facilities. The purpose of this development would be to extend the cultural offer in the City whilst at the same time make the Trust more sustainable. The Trust would also like to declare its interest in possibly extending its footprint further, in the future, to include the current Salvation army building on Abbey Street.			
The Trust would like the Local Plan to acknowledge the Trust's proposed development as a key economic driver which is fundamental to the ambition to develop Carlisle in general, and Tullie House in particular, as both tourism destinations and providers of high quality cultural heritage. The proposed development sites are within the Historic Quarter and if realised will provide the catalyst for regenerating this particular part of the City.				
20516 E2	Comment	Policy:	n/a	
268		Mr Simon Artiss	Barratt Homes Ltd	
Detail	We seek a Local Plan that supports viable residential development over the plan period. Barratt Homes seeks opportunities as we expand outputs annually. Viability remains an issue as build costs continue to increase whilst sales values are not necessarily increasing. Help to Buy is assisting the industry and we seek policies that support this important improvement. New housing delivers economic, social and environmental benefits as per NPPF and is an important part of the country's economic recovery. Policies need to allow sufficient flexibility on a site by site basis to support delivery of development. We do not comment in detail due to lack of resources (the Division covers over 40 LPA areas) but we wish to maintain our involvement in your plan-making process and will review land opportunities accordingly.			

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

20456 E1 Comment Policy: n/a
 256 Allen Hodgson Wise
 Detail Villages are being turned into town without any support network in place and infrastructure. All the roads leading into Wetheral are in serious disrepair and the traffic created during the construction of these estates and resulting traffic when they are occupied would only aggravate this.

20426 Eo Comment Policy: n/a
 252 Mr Peter Sherrington
 Detail I believe that more could be done to help pensioners. e.g. Reduced rates for the pools and the sands during off peak times, I think more people would use the facilities thus cutting costs for the city council.

20116 Objection Policy: n/a
 214 Mr Nicholas Bethune Campaign for Borders Rail
 Detail the settlement profile for Longtown, which would be affected by the re-instatement of the Waverley Route, makes no mention of the railway and its alignment is not highlighted on the Settlement Proposals Map.
 Please refer to our separate Consultation Response document for comprehensive details and background to this and our other comments.
 Settlement Profile to be amended to refer to the possible reinstatement of railway on land to the west of town. Statement to ensure any development e.g. Expansion of the industrial area, to the west onto the floodplain does not compromise the ability to reinstate the railway on an alternative alignment (See previous section item d. See also Fig 4 in the attached Consultation Response Document)

20101 Comment Policy: n/a
 212 Mr Hans Landström
 Detail There is a need for an improved pedestrian crossing facility on Kingmoor Road/Etterby Scaur at the junction with Etterby Road.

20106 Comment Policy: n/a
 212 Mr Hans Landström
 Detail There is a need for a road sign to be installed at Eden Place in Carlisle. There was an episode in September 2013 when an ambulance needed to be called and bystanders were unable to identify the road name.

20105 Comment Policy: n/a
 212 Mr Hans Landström
 Detail The Carlisle Northern Development Route is a major plus for the City and has succeeded in alleviating pressure on Scotland Road.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20104	Comment	Policy:	n/a	
212	Mr Hans Landstrom			
Detail	Consideration should be given to creating a cafe on the top floor of the Civic Centre to enable visitors and tourists to take advantage of the attractive panoramic views enjoyed.			
20102	Comment	Policy:	n/a	
212	Mr Hans Landstrom			
Detail	The parking area in front of Marks and Spencers in the City Centre should be prioritised. There have been a number of occasions where there has been evident conflict between vehicles using the provision and pedestrians.			
20410 Eo	Comment	Policy:	n/a	
248	Mr Eddie Haughan			
Detail	On the whole the Plan appears sound however, it seems to be based, in part, on conjecture and ambition. There is nothing intrinsically wrong with this but it might also be wise to take history into consideration. The population of Carlisle has changed little over the last 40 years. If you, our Council, believe that it will grow dramatically over the next 16 years and that there will be sufficient employment to sustain that growth, then you should reflect that belief in your plans. I believe there are 52 councillors which means 1 person's opinion accounts for 2% of any vote and your consultation is based, in part, on only 5.4% of Carlisle households. Please be wary of statistics in consultations			
20364	Comment	Policy:	New	
154/26/27	Mr Bryan Craig			
Detail	There should be a policy in the local plan which allows communities to add areas of Local Green Space in accordance with NPPF Paragraph 76, 77 and 78. There is a wish from Dalston residents to protect areas around the river and the area north of the railway due to their natural beauty, historic significance and richness of its wildlife.			

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

20606 Objection Policy: New

083 The Coal Authority

Detail Policy Omission, Unstable Land
 Test of Soundness
 Positively Prepared - No
 Justified - No
 Effective - No
 Consistency to NPPF - No
 Legal & Procedural Requirements Inc. Duty to Cooperate - Yes

Objection – Carlisle contains a significant number of mining legacy features which will result in land instability. Unstable land can and does also arise from other natural and man-made sources. National planning policy in NPPF paragraph 120 requires development plans to include planning policies on unstable land. This is a locally distinctive issue in Carlisle which should consequently be addressed, although it is accepted that the areas of mining legacy are not those where the main focus of new development will be concentrated.

A suitable planning policy framework should be developed, this could either be through a bespoke policy or Policy 51 which addresses land contamination could be amended.

Change Requested – The Coal Authority would suggest the following amendments to Policy 51:

“Policy 51 - Land Affected by Contamination or Instability

Development will be acceptable on land that is contaminated or where contamination is

Suspected or is potentially unstable, subject to;

- 1) Adequate contaminated land assessments or land stability assessments prepared by a suitably competent person are submitted prior to any planning decision being taken, to determine whether or not unacceptable risks to human health or the environment arise from the proposals; and
- 2) Where necessary, suitable mitigation and/or remediation is carried out to ensure safe development.

As a minimum, land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990.”

Suitable additional wording would also need to be included in the justification.

Reason – To comply with the requirements of national planning policy set out in paragraphs 109, 120, 121 and 166 of the NPPF, and the advice set out in section 45 of the National Planning Practice Guidance

20363 Comment Policy: New

154/26/27 Mr Bryan Craig

Detail To prevent Urban Sprawl I would like to see a Green Belt established between Peter Lane and Lingey to assist in safeguarding the countryside from further encroachment and prevent the eventual merging of Dalston with Carlisle NPPF Paragraph 80 to 91.

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

20376 Comment Policy: New

005 Paul Barton Clerk to Dalston Parish Council

Detail The Parish Council has concerns over the lack of Local Green Space Policy as detailed in paragraphs 76, 77 of the NPPF. There should be a local Green Space Policy to reflect a major component of the NPPF.

The Parish Council has produced a map of Dalston Appendix 1) identifying the areas around Dalston that should be allocated within the local Plan as Local Green Space.

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 Evidence

20397 Eo Support Policy: n/a

166/41 Mrs Yvonne Maynard

Detail Yes.

20294 Comment Policy: n/a

234 S Nicholson A008

Detail To an extent but without prejudice to the views expressed in these representations. [20298 - 20305]

20286 Objection Policy: n/a

232 Mr Jonathan Coulthard Cowens Ltd A018

Detail Unclear as to the evidence that there is a 5 year supply of housing. No table in Appendix 1.

20267 Objection Policy: n/a

231 North Associates & Cumbria Consta A018

Detail Unclear as to the evidence to maintain that there is a 5 year supply of housing. No table in appendix 1.

20264 Objection Policy: n/a

230 Edwin Thompson A018

Detail Unclear as to the evidence to maintain that there is a 5 year supply of housing. No table in appendix 1.

20238 Objection Policy: n/a

228 Mr Norman Brown

Detail Credible? Quite to the contrary! Please see my comments below [reps no 20239 - 20243].

20204 Support Policy: n/a

227 Mr Michael Edwards

Detail Yes.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20173	Comment	Policy:	n/a	
225	JR & JA Workman			Aoo8
Detail	To an extent but without prejudice to the views expressed in further representations.			

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

20148 Objection Policy: n/a

223 Taylor Wimpey UK Limited A026

Detail Taylor Wimpey UK Limited does not consider that the evidence used in preparing the draft Local plan with regards to housing is robust and credible. It is considered that it needs updating to reflect guidance contained in the Framework and the new Planning Practice Guidance.

The Carlisle City Council Housing Need and Demand Study, produced by GL Hearn in association with JG Consulting in November 2011, modelled a range of demographic and employment-led scenarios over the period 2010 to 2025/2030. The future population/household projections which underpin the modelling exercise rely upon Cumbria County Council's in-house projections. The Study concluded that a range of 400-665 dwellings per annum [dpa] would be appropriate, based on longer term demographic trends at the bottom end of the range and meeting the Experian baseline job growth at the top end. It further suggested that the lower end of the range could be raised to 545 dpa (equal to the zero net job growth scenario) to support a 'clear ambition for growth' as expressed in the Council's Core Strategy Issues and Options Consultation. Taylor Wimpey UK Limited raises the following queries on the Housing Need and Demand Study:

- 1 The study was published in November 2011. As such, it predates both the Framework and the Practice Guidance and does not fully accord with national policy or guidance as a result. It is therefore out of date;
- 2 There is no detailed breakdown of the various data sources used nor the methodology used by Cumbria County Council to model the housing requirements other than reference to the use of the 2008-based household projections to obtain headship rates. As such, it is difficult to comment on their assumptions concerning economic activity rates, commuting ratios and unemployment levels over time. Nevertheless, given the date the study was undertaken, it appears reasonable to assume that the latest 2011 Census data was not used, nor was the ONS 2010-based Sub-National Population Projections [SNPP] and certainly not the ONS 2011-based (interim) SNPP nor the equivalent CLG household projections;
- 3 There is no analysis of the 6 key market indicators as set out in the Practice Guidance (specifically house prices, affordability ratios, land values, private rental levels, overcrowding and past housing delivery) and no discussion as to whether worsening indicators would justify an uplift of the figures over and above the level suggested by the demographic requirements;
- 4 No detailed analysis has been undertaken of what constitutes the Housing Market Area for the City – they have just used Carlisle City local authority administrative area. The Nevin Leather report 'The definition of housing market areas in the North West region', undertaken in August 2008 on behalf of 4NW, suggested that the Carlisle HMA should include all of Carlisle, plus some of adjoining Allerdale District. This is recognised in paragraph 11.7 of the report, but no explanation of how this has been practically addressed (i.e. whether Carlisle is meeting some of Allerdale's needs, or vice versa);
- 5 The base data for the demographic projections uses the 2010-based mid-year population estimates as inputted into the Cumbria County Council model. This indicated that City's population was 104,539 in 2010. However, the 2011 Census estimated that the total resident population in 2011 was actually 107,524. The subsequent adjustment made to the 2010 mid-year population estimate suggests that the City's population was actually 106,985, almost 2,500 higher than the figures used to underpin Carlisle Council's modelling. This could suggest that the modelling has under-estimated population growth;
- 6 Of the 7 scenarios modelled by Cumbria County Council, one relates to zero net migration, which is unrealistic and should be discounted; two are based on 'recent' migration data over the past 5/10 years, which is presumably now out of date; two more are effectively supply led, modelling the implications of recent delivery rates/targets and do not constitute an assessment of need per se. Of the two employment-led projections, one uses the Experian baseline January 2011, which presumably was commissioned at the heart of the economic downturn. Paragraph 11.12 suggests that the Experian January 2011 projections indicated a job growth of 2,900 to 2026 although the report acknowledges that subsequent economic forecasts are 'more bullish', forecasting 3,800 jobs to 2026. It is likely that even these 'bullish' projections were suppressed by the worsening economic indicators at the time. It is probable that new policy off projections may be more optimistic. The final scenario models the demographic implications of having zero employment growth. This scenario is hardly the LPA 'doing all it can' to support economic growth;
- 7 As such, none of the scenarios modelled use the latest economic or demographic data as required by the Guidance. Furthermore, the two employment-led projections only run to 2025, rather than 2030, and therefore do not cover the whole of the plan period. This is particularly problematic, given that these two scenarios frame both the upper and lower end of the recommended (uplifted) range;
- 8 No 'policy-on' economic scenario has been modelled that might link with the Council's/LEP's economic aspirations/objectives for Carlisle. No reference is made to the Council's Employment Land Review, therefore it is difficult to see how the various elements of the Council's Local Plan evidence base can be said to 'dovetail together'

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20145	Objection	Policy:	n/a	
222	Mr Tim Grayson			
Detail	See Rep 20147 Site BURG1.			
20136	Objection	Policy:	n/a	
220	Mr Terrence Ridley			
Detail	See comments to 20139 and 20140.			
20075	Support	Policy:	n/a	
020		Essar Oil (UK) Ltd		A005
Detail	Yes.			
20522 E2	Support	Policy:	n/a	
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	Yes.			
20401 E0	Comment	Policy:	n/a	
247	Mrs Samantha McAlister			
Detail	The population increase over the last 10 years in Carlisle is 1.1% below the national average ie. 6.7%, less for Cumbria as a whole. A smaller percentage increase on a smaller population equates to far fewer housing needs. Carlisle does not have the industry to attract people from out of the area so who are the houses being built for?			
20431 E0	Objection	Policy:	n/a	
134/6	Mr Nigel Holmes			
Detail	No.			
20278	Objection	Policy:	n/a	
119		Stainsby Garage Ltd		A018
Detail	Evidence if robust has not been followed through into proposed policy as discussed later. [reps 20280 & 20281]			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20282	Objection	Policy: n/a		
109		Alexandra Sawmills		Ao18
Detail	Evidence if robust has not been followed through into proposed policy as discussed later. [reps 20284 & 20285]			
20275	Objection	Policy: n/a		
108		Mr A McCumiskey		Ao18
Detail	Unclear as to the evidence to maintain that there is a 5 year supply of housing. No table in appendix 1.			
20270	Objection	Policy: n/a		
106		North Associates		Ao18
Detail	Unclear as to the evidence to maintain that there is a 5 year supply of housing. No table in appendix 1.			
20308	Comment	Policy: n/a		
096		Rob Naples	Northumberland County Council	
Detail	<p>Duty to Co-operate</p> <p>Under the Duty to Co-operate, Northumberland County Council welcomes continued joint working on strategic and cross-boundary issues as the Local Plan progresses. I trust our comments will be of assistance to you as you progress your Local Plan towards adoption and look forward to further involvement by the County Council as a neighbouring authority in line with our duty to cooperate.</p>			
20211	Objection	Policy: n/a		
077		Mr Alan Hubbard	National Trust	
Detail	<p>Whilst it is noted that there have been some additions to the spatial portrait in respect of heritage considerations it is also noted that this has not included any particular references to evidence base documents relating to the qualities of the District's heritage.</p> <p>There remains a concern about the robustness of the evidence of need for housing in the rural areas and specifically an assessment of the impacts of such provision upon services and upon environmental assets.</p>			
20038	Support	Policy: n/a		
043		Nigel Winter	Stagecoach	
Detail	Yes.			
20161	Comment	Policy: n/a		
034		Lucy Adamski		Aoo8
Detail	To an extent but without prejudice to the views expressed in further representations.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20245	Objection	Policy: n/a		
033	Matthew Good	Home Builders Federation		
Detail	The HBF still considers Rep No 0056 - Duty to co-operate & Impact of adjoining authorities still to be valid.			
20131	Objection	Policy: n/a		
219	Mr Peter Cottram			
Detail	The Rural Masterplanning final draft for Burgh made no mention of the site at Highfield, details of which were not made public until a week or two ago, allowing no time for consideration.			
20462 E1	Objection	Policy: n/a		
258	Mr & Mrs Brian & Pamela Bishop			
Detail	Sewage and drainage problems in Burgh by Sands village have not been addressed. There will be access problems due to the narrowness of Sandsfield Lane. There are alternative, more suitable available sites on the local plan.			
20614	Objection	Policy: n/a		
274	Mr Paul Greenwood			
Detail	The population increase over the last 10 years in Carlisle is 1.1% below the national average ie. 6.7%, less for Cumbria as a whole. A smaller percentage increase on a smaller population equates to far fewer housing needs. Carlisle does not have the industry to attract people from out of the area so who are the houses being built for?			
20608	Objection	Policy: n/a		
272	Mrs Wendy Daley			
Detail	In particular to the Cumwhinton map areas of surface water flooding have not been included			
20546	Support	Policy: n/a		
270		Carlisle Shopping Centre Ltd		A028
Detail	See accompanying letter.			
20517 E2	Support	Policy: n/a		
269	Mr Andrew Mackay	Tullie House Museum & Art Gallery		
Detail	Yes.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20512 E2	Comment	Policy:	n/a	
268	Mr Simon Artiss	Barratt Homes Ltd		
Detail	You need a 'Don't Know' option. Are you seriously asking people to review ALL of your evidence at this stage in order to comment on your draft Local Plan?			
20185	Comment	Policy:	n/a	
265	Donald Forrester			
Detail	<p>There are facets of a technical nature that take time to research and develop some of which could be a problem for lay people to get to grips with; I include myself. Such a large scale document referring to other papers, Policy matters and complicated documents take time to digest.</p> <p>To say the plan is not robust or credible, is for people with more knowledge of the subject than I to establish. However, there are some related issues which one finds difficult to get a handle on.</p> <p>The proposed planned house/flat count for the south 'east' of the City (off London Road, Harraby, Carleton, Garlands, Cumwhinton & Wetheral) is some 960 properties to include those cleared for development, under construction and already built but not occupied. Much of the traffic, if not, all will converge onto London Road via Cumwhinton Road. Currently at peak times London Road is crowded, as is Cumwhinton Road. There appears to be little or no explanation of how the additional traffic will perambulate/feed into Botchergate, bearing in mind, the convergence of traffic at St Nicholas, which may be bolstered by the homes planned for Durdar.</p> <p>It may be also worthy of note, much of the traffic in south Wetheral will go via Cumwhinton Road onto London Road adding to the congestion, thus generating an additional environmental impact.</p> <p>Education in the Wetheral area is another issue. Wetheral will have circa 139 additional properties, including planned flats and houses not yet developed or in the course of development, plus a further 44 proposed properties in Scotby with 45 currently under construction. Scotby School is full, as is Cumwhinton; I understand both will be for the foreseeable future. Richard Rose may also suffer from over capacity. I found no evidence in the document that a comprehensive educational study had been commissioned.</p>			
20489 E2	Support	Policy:	n/a	
264	Mrs Elizabeth Hill-Gorst	SAVE WETHERAL VILLAGE GROU		
Detail	Yes.			
20484 E2	Objection	Policy:	n/a	
263	Mr Daniel McViety			
Detail	The population increase over the last 10yrs in Carlisle is below the national average , less for Cumbria as a whole. a smaller percentage increase on a smaller population equates to far fewer housing needs , Carlisle does not have an industry to attract people from out of the area so who are the houses being built for?			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20479 E1	Comment	Policy:	n/a	
262	Mrs Elisabeth Price			On behalf of Mr.and Mrs. C.L.Price
Detail	I have my reservations about "sustainability". One cannot accurately forecast the future obviously but A) I wonder where the jobs are for the forecasted inhabitants of all the housing proposed.b) I think morecare should be given to this proposed increase in population. Instead of tagging houses onto established villages why not build a purpose built new village/town with proper infrastructure in utilities,particularly sewage, shops and most importantly Schools. I speak as a resident of Wetheral and know that the surrounding schools are full to capacity. Even if the old "catchment" areas were re-introduced this would mean schools only taking local children andthe others to be distributed into the City where there are shortages of schools.			
20474 E1	Objection	Policy:	n/a	
261	Mr Graham Watt			Wheatsheaf Inn, Wetheral
Detail	Wetheral needs a school their is no beating round the bush with this with the volume of houses that is going to be built. It is no longer going to be a village but how on earth can a village this size sustain the extra houses with no school. Its beyond belief. The nice old and quaint houses will never be built again in wetheral as developers are only interested in squeezing as many houses on to a piece of land as possible			
20310	Support	Policy:	n/a	
235				Carleton Farm Development Action
Detail	Yes.			
20467 E1	Objection	Policy:	n/a	
259	Mr Stephen Bowe			
Detail	No			
20393 Eo	Objection	Policy:	n/a	
246	Mr Ken Sutherland			
Detail	No.			
20457 E1	Objection	Policy:	n/a	
257	Mrs Marjorie Jane Wise			
Detail	The population in Carlisle over the past ten years is 1.1% below the national average (6.7% less for Cumbria as a whole.) A smaller percentage increase on a smaller population equals fewer housing needs. Carlisle does not have the industry to attract people, so who are these houses being built for?			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20451 E1	Objection	Policy:	n/a	
256	Allen Hodgson Wise			
Detail	The population increase over the last 10 years in Carlisle is 1.1% below the national average ie. 6.7%, less for Cumbria as a whole. A smaller percentage increase on a smaller population equates to far fewer housing needs. Carlisle does not have the industry to attract from without the area so who are the houses being built for?			
20446 E1	Objection	Policy:	n/a	
255	Mr & Mrs McIntosh			
Detail	The population increase over the last 10 years in Carlisle is below the national average ie.3.6% (HNDS 2011) less for Cumbria as a whole. A smaller percentage increase on a smaller population equates to far fewer housing needs. Carlisle does not have the industry to attract people from out of the area so who are the houses being built for? It would appear that not all identified areas of land have been assessed for this phase of the plan as evidence in the SHLAA is lacking.			
20441 E1	Objection	Policy:	n/a	
254	Mr Malcolm Hannah			
Detail	No			
20436 E1	Objection	Policy:	n/a	
253	Mrs Louise Holmes			
Detail	No.			
20427 Eo	Support	Policy:	n/a	
252	Mr Peter Sherrington			
Detail	Yes.			
20421 Eo	Objection	Policy:	n/a	
251	Mr Alistair Martin			
Detail	What is the point of building more houses, when we haven't the industry to attract people or the schools in areas where the housing are proposed.			
20416 Eo	Objection	Policy:	n/a	
250	Mr David Fordy			
Detail	The population in Carlisle is below the national average,there is very little industry to bring people to the area,so who are these houses being built for.			

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20411 Eo Objection Policy: n/a

249 Mr John Murray Anderson

Detail Where are the increased population of the area going to work?

20406 Eo Objection Policy: n/a

248 Mr Eddie Haughan

Detail Merely repeating the word "robust" does not make it so. "Of an initial 10,000 survey forms sent out to households across the City, 2,581 completed survey forms were returned representing a response rate of 25.8%. Overall, some 5.4% of households in the District took part in the survey. The number of responses provides sufficient data to allow complete, accurate and detailed analysis of need and demand across the District." This report is based on a return of just 5.4% of households. I would, therefore disagree strongly with the final sentence quoted.

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20688 Objection Policy: n/a

275 Cllr Allison

Detail Community Infrastructure Levy

1.16 The Carlisle Local Plan Preferred Options Stage Two is accompanied by a number of other documents, some of which are essential to the delivery of the Plan.
 1.18 Section 206 of the Planning Act 2008 (The Act) confers the power to charge Community Infrastructure Levy --- came into force 6th April 2010 (and Levy Amendment Regulations 2011). --- provides enabling powers for Local Authorities to apply CIL to development proposals to support infrastructure delivery --- support delivery of the Development Plan.

1.19 The Council is yet to make a judgement as to whether a CIL should be adopted. Any final decision should be subject to viability studies being undertaken and an Examination in Public.

Comments;

There is widespread disaffection with the statutory planning consultation process, which this document does not address.

Of the three current major housing developments in the ward that I represent, at Durdar, Dalston, and Morton (Cummingsdale Grange) the perception is that the public and Councillor representations achieved no outcomes beyond those dictated by the developer. Yet, the Localism Act of 2011 provides for the involvement of communities down to Neighbourhood Forum level where there is no formal Parish representation (1.11).

1. There is no commitment to even consideration of a CIL after the Local Plan is adopted.
2. There is no clarity on who is to make the judgement on this issue, just "The Council".
- 3 Has this important aspect ever been on the agenda of the Working Group of Councillors who have contributed to the development of the Local Plan document?

I made representations before the DC committee when they were considering a development at Morton. The Director of Economic Development advised me that "The City Council do not have a policy requiring infrastructure as a condition for a development". The County Highways representative at the meeting confirmed that they respond in accordance with the District Council's (the planning authority) Policies.

A CIL would provide up to 25% of the levy on a development that is usually done under a S106 and/or S278. Just as important is the requirement under a CIL for community involvement in the development of major schemes. A number of authorities have adopted the CIL and South Lakes are apparently working on theirs. There is disillusionment with the process and a democratic deficit which has become apparent in three major developments; at Dalston, Cummingsdale Grange and at Durdar, which I suggest would have been addressed with the implementation of the CIL. There appears to be a lack of commitment to this process.

I urge a more positive statement about the CIL and describing its function, together with a commitment to the process and incorporating its aims into this document.

As a statutory consultee, County Highways frame their responses in accordance with District Planning policy. Could there not be a Policy requiring Infrastructure development in major schemes?

20469 E1 Comment Policy: n/a

260 Mr Garry Leadbetter

Detail Cannot answer.

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STAGE 2 REPRESENTATIONS

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Stage 2 Chapter NPPF

20523 E2 Support Policy: n/a

188 Mrs Alison Riddell Clerk to Brampton Parish Council

Detail Yes.

20296 Support Policy: n/a

234 S Nicholson A008

Detail Yes.

20295 Comment Policy: n/a

234 S Nicholson A008

Detail To an extent but without prejudice to the views expressed in these representations. [20298 - 20305]

20287 Comment Policy: n/a

232 Mr Jonathan Coulthard Cowens Ltd A018

Detail Not completely.

20268 Comment Policy: n/a

231 North Associates & Cumbria Consta A018

Detail Not completely.

20265 Comment Policy: n/a

230 Edwin Thompson A018

Detail Not completely.

20239 Support Policy: n/a

228 Mr Norman Brown

Detail Without doubt there is a desperate need for more houses, and that may mean more houses being built in villages.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20174	Comment	Policy: n/a		
225	JR & JA Workman			Aoo8
Detail	To an extent but without prejudice to the views expressed in further representations.			
20149	Objection	Policy: n/a		
223		Taylor Wimpey UK Limited		Ao26
Detail	See Representation 20148 {Evidence} - for the reasons outlined, we do not consider that the plan is consistent with the Framework. Further evidence needs to be prepared to ensure that the Council meets its objectively assessed housing needs and to ensure the Plan is sound.			
20146	Objection	Policy: n/a		
222	Mr Tim Grayson			
Detail	Query whether the NPPF agrees to construction on AONB when there are alternative sites in the locality (BURG1).			
20162	Comment	Policy: n/a		
034	Lucy Adamski			Aoo8
Detail	To an extent but without prejudice to the views expressed in further representations.			
20132	Objection	Policy: n/a		
219	Mr Peter Cottram			
Detail	Priority should be given to brownfield sites over agricultural land. This is clearly not the case in this instance, when a perfectly suitable brownfield site exists in the village.			
20402 Eo	Objection	Policy: n/a		
247	Mrs Samantha McAlister			
Detail	The Government have re-affirmed the importance of protecting the best and most versatile agricultural land and seek to use areas of poorer quality land (NPPF paragraph 112). There is no evidence that this has been taken into consideration.			
20398 Eo	Support	Policy: n/a		
166/41	Mrs Yvonne Maynard			
Detail	Yes.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20432	Objection	Policy:	n/a	
134/6	Mr Nigel Holmes			
Detail	No			
20279	Objection	Policy:	n/a	
119		Stainsby Garage Ltd		Ao18
Detail	Not in respect of the aspects discussed later [reps 20280 & 20281]			
20283	Objection	Policy:	n/a	
109		Alexandra Sawmills		Ao18
Detail	Not in respect of the aspects discussed later [reps 20284 & 20285]			
20276	Comment	Policy:	n/a	
108	Mr A McCumiskey			Ao18
Detail	Not completely.			
20271	Comment	Policy:	n/a	
106		North Associates		Ao18
Detail	Not completely.			
20682	Objection	Policy:	n/a	
104	Emily Hrycan	English Heritage North West		
Detail	<p>The historic environment in Carlisle is an important part of the area and makes a significant contribution including its economic well-being . The Local Plan (currently) is considered to be unsound as it fails to meet the requirements of the NPPF regarding the following issues:</p> <ul style="list-style-type: none"> - It is not based on adequate, up-to-date and relevant evidence about the historic environment; - It does not set out a positive strategy for the conservation, enhancement, improvements and enjoyment of the historic environment; - It does not contain strategic policies to deliver the conservation and enhancement of the historic environment; - It does not consider whether it needs to identify land where development would be inappropriate because of its environmental or historic significance. <p>English Heritage would be happy to work with you in developing the Plan further to help resolve these issues. There appears to be inconsistencies in referring to the World Heritage Site. Any references should be amended to read "Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site".</p>			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20212	Comment	Policy: n/a		
077	Mr Alan Hubbard	National Trust		
Detail	See detailed responses where relevant references to the NPPF are made.			
20039	Support	Policy: n/a		
043	Nigel Winter	Stagecoach		
Detail	Yes.			
20137	Objection	Policy: n/a		
220	Mr Terrence Ridley			
Detail	See comments to 20140 and 20139			
20458 E1	Objection	Policy: n/a		
257	Mrs Marjorie Jane Wise			
Detail	(NPPF paragraph 112) The government have re-affirmed the importance of protecting the best and most versatile agricultural land, and seek to use areas of poorer quality. THERE IS NO EVIDENCE THAT THIS HAS BEEN TAKEN INTO CONSIDERATION.			
20609	Objection	Policy: n/a		
272	Mrs Wendy Daley			
Detail	In particular to the Cumwhinton map areas of surface water flooding have not been included			
20547	Support	Policy: n/a		
270		Carlisle Shopping Centre Ltd		A028
Detail	See accompanying letter.			
20518 E2	Support	Policy: n/a		
269	Mr Andrew Mackay	Tullie House Museum & Art Gallery		
Detail	Yes.			
20513 E27	Comment	Policy: n/a		
268	Mr Simon Artiss	Barratt Homes Ltd		
Detail	Again, a third option of 'Other' should be available. As with your evidence, it's up to you to ensure it accords with NPPF.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20186	Comment	Policy:	n/a	
265	Donald Forrester			
Detail	WETH2 refers. It is understood the Government wish to protect the best and most versatile agricultural land and use poorer quality land for building purposes. Having no idea what constitutes good and versatile agricultural land, has it been established that the portion of land in question is land of poor agricultural quality, as prescribed in the NPPF Para 112?			
20490 E2	Support	Policy:	n/a	
264	Mrs Elizabeth Hill-Gorst	SAVE WETHERAL VILLAGE GROU		
Detail	Yes.			
20485 E2	Objection	Policy:	n/a	
263	Mr Daniel McViety			
Detail	The government have re-affirmed the importance of protecting the best and most versatile agricultural land and seek to use areas of poorer quality land (NPPF paragraph 112). There is no evidence this has ben taken into consideration.			
20480 E1	Comment	Policy:	n/a	
262	Mrs Elisabeth Price	On behalf of Mr.and Mrs. C.L.Price		
Detail	I am not qualified to make this sort of judgement but would hope as this plan has taken so long to formulate, that it will be in line with the National Planning Policy Framework. If it is not there will be total confusion regarding planning.			
20475 E1	Objection	Policy:	n/a	
261	Mr Graham Watt	Wheatsheaf Inn, Wetheral		
Detail	No consultation with highways. How the roads can cope with the increased traffic is impossible as roads are already heavily congested. The increase of public transport would be required but would the local companies do this?			
20311	Support	Policy:	n/a	
235		Carleton Farm Development Action		
Detail	Yes.			
20463 E1	Objection	Policy:	n/a	
258	Mr & Mrs Brian & Pamela Bishop			
Detail	Because this field has been used for cattle grazing up until now. It is arable ground. (BURG1)			

RepNo	Status	Paragraph	Page	Stage 2 Map:
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20394 Eo	Objection	Policy:	n/a	
246	Mr Ken Sutherland			
Detail	No.			
20452 E1	Objection	Policy:	n/a	
256	Allen Hodgson Wise			
Detail	The Government have re-affirmed the importance of protecting the best and most versatile agricultural land and seek to use arrears of poore quality land (NPPF para 112). There is no evidence that this has been taken into consideration.			
20447 E1	Objection	Policy:	n/a	
255	Mr & Mrs McIntosh			
Detail	The Government have re-affirmed the importance of protecting the best and most versatile agricultural land and seek to use areas of poorer quality land (NPPF paragraph 112). There is no evidence that this has been taken into consideration.			
20442 E1	Objection	Policy:	n/a	
254	Mr Malcolm Hannah			
Detail	No.			
20437 E1	Objection	Policy:	n/a	
253	Mrs Louise Holmes			
Detail	No.			
20428 Eo	Support	Policy:	n/a	
252	Mr Peter Sherrington			
Detail	Yes			
20422 Eo	Objection	Policy:	n/a	
251	Mr Alistair Martin			
Detail	Did the government not state the importance of protecting our best agricultural land (NPPF paragraph 112). Has this been taken into account.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20417 Eo	Objection	Policy:	n/a	
250	Mr David Fordy			
Detail	The Government states that only poor quality land will be considered. There is no evidence that this has been considered.			
20412 Eo	Objection	Policy:	n/a	
249	Mr John Murray Anderson			
Detail	The Government has been pushing that we should protect our good quality agricultural land and use brown field sites for development. I do not see any evidence of that in your plan.			
20407 Eo	Support	Policy:	n/a	
248	Mr Eddie Haughan			
Detail	But bear in mind that the National Planning Policy Framework is a guideline NOT a mandate.			
20615	Objection	Policy:	n/a	
274	Mr Paul Greenwood			
Detail	The Government have re-affirmed the importance of protecting the best and most versatile agricultural land and seek to use areas of poorer quality land (NPPF paragraph 112). There is no evidence that this has been taken into consideration.			
20470 E17	Objection	Policy:	n/a	
260	Mr Garry Leadbetter			
Detail	In terms of Wetheral Village, there appears to be a desire to overdevelop the two greenfield sites identified and not taking into account likely housing needs and current infrastructure.			

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STAGE 2 REPRESENTATIONS

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Stage 2 Chapter SA

20138 Objection Policy: n/a

220 Mr Terrence Ridley

Detail See comments to 20140 and 20139

20163 Support Policy: n/a

034 Lucy Adamski

Aoo8

Detail Yes

20408 Eo Support Policy: n/a

248 Mr Eddie Haughan

Detail Yes

20403 Eo Objection Policy: n/a

247 Mrs Samantha McAlister

Detail There is no evidence of consultation with the highways authority, any development to the South of the city is going to impact on the already heavily congested A6. In order to reduce emissions of green house gasses (1.9) there is a need to reduce the use of private vehicles. The cost of public transport is prohibitive for the working population to use for commuting from rural areas

20395 Eo Objection Policy: n/a

246 Mr Ken Sutherland

Detail No

20390 Objection Policy: n/a

244 Kate Wheeler

Natural England

Detail There is no key for the colour coding within the Sustainability Appraisal (SA) tables so these comments are made on the assumption that red indicates a negative effect, orange a neutral effect and green a positive effect.
Natural England agrees with the conclusions reached in the SA. The SA clearly outlines both negative and uncertain impacts. We note there are some unresolved uncertainties in the SA. These negative and uncertain effects should be explored further in the next iteration of the SA as avoidance and/or mitigation measures may be required in order to reduce harm to the environment. As more information becomes available the findings should become more refined.

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20312	Support	Policy: n/a		
235		Carleton Farm Development Action		
Detail	Yes			
20418 Eo	Objection	Policy: n/a		
250		Mr David Fordy		
Detail		There is no evidence of any consultations with the highways. There is a need to reduce private vehicles using an already overloaded road.		
20175	Support	Policy: n/a		
225		JR & JA Workman		Aoo8
Detail	Yes			
20423 Eo	Objection	Policy: n/a		
251		Mr Alistair Martin		
Detail		Any development to the south of the city is going to cause more congestion on our already congested roads, which were not built to accommodate heavy traffic.		
20133	Objection	Policy: n/a		
219		Mr Peter Cottram		
Detail		Priority should be given to brownfield sites over agricultural land. This is clearly not suitable. Brownfield site exists in the village.		
20524 E2	Support	Policy: n/a		
188		Mrs Alison Riddell		Clerk to Brampton Parish Council
Detail	Yes			
20502 E2	Comment	Policy: n/a		
158/33		Mrs Julie Templeton		
Detail		I do not believe that the Local Plan provides greater certainty for communities particularly in Rickergate where the City Centre Masterplan has identified it as a place for development ie. 'Mixed Use'. The findings of the Local Plan can be over-ridden by the NPPF's emphasis on economic growth taking precedence over social and environmental consideration regarding sustainable development. There also seems to be ambiguity over 106 agreements and CILs. I realise that this is beyond the control of the Planning Dept.		

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20433 Eo 134/6 Detail	Objection Mr Nigel Holmes No	Policy: n/a		
20683 104 Detail	Comment Emily Hrycan	Policy: n/a	English Heritage North West	
	Due to the number of consultations received, English Heritage is unable to comment on the draft Sustainability Appraisal (SA) of the Carlisle Local Plan. We would like the opportunity to comment on the SA in order to help inform the Council's development of the next stage of the Local Plan and its site allocations, and to accompany our response to the draft Plan (Dated 17th April 2014). If you would like English Heritage to respond to the SA before the next round of Local Plan consultations, please let me know.			
20621 o8o Detail	Objection Mike Downham	Policy: n/a	Carlisle Food City Steering Group	
	Apart from a reference to the food and drink offer in the north-west area of the city, food is not mentioned. We suggest that appropriate references to food should be included within each of the Economic, Social and Environment sections of the Appraisal.			
20040 o43 Detail	Support Nigel Winter Yes	Policy: n/a	Stagecoach	
20240 228 Detail	Objection Mr Norman Brown	Policy: n/a		
	I think there has been little thought given to important infrastructure requirements such as roads, which are all category B, and the density of traffic at peak times.			
20471 E17 26o Detail	Objection Mr Garry Leadbetter	Policy: n/a		
	The proposed two new large estates at the southern end of Wetheral Village will substantially increase car volumes through an already very restricted village centre. The two major supermarkets of Tesco (junction 43) and Asda (junction 44) will draw the majority of vehicles through the village.to the detriment of all village residents..			
2061o 272 Detail	Objection Mrs Wendy Daley	Policy: n/a		
	In particular to the Cumwhinton map areas of surface water flooding have not been included			

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Consultee Ref No	Consultees.Contact	Organisation		Agent
20519 E2	Support	Policy:	n/a	
269	Mr Andrew Mackay			Tullie House Museum & Art Gallery
Detail	Yes			
20514 E2	Comment	Policy:	n/a	
268	Mr Simon Artiss			Barratt Homes Ltd
Detail	Same comments as previously [reps 20512 & 50513 E27]- you can't realistically expect all consultee responses to this inline questionnaire to have reviewed these documents.			
20187	Comment	Policy:	n/a	
265	Donald Forrester			
Detail	Being specific with regards to the land described as WETH2 west of Steele's Bank, unable to locate a Sustainability Appraisal.			
20491 E2	Objection	Policy:	n/a	
264	Mrs Elizabeth Hill-Gorst			SAVE WETHERAL VILLAGE GROU
Detail	Policy S2: How can 665 new dwellings per annum be sustainable or needed with the large amount of empty properties already build 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. Also referenced this under S2 [20492 E21]			
20486 E2	Objection	Policy:	n/a	
263	Mr Daniel McViety			
Detail	There is no evidence of consultation with the highways authority, any development to the south of the city is going to impact on the already highly congested A6. In order to reduce emissions of green house gasses (1.9) there is a need to reduce the use of private vehicles. The cost of public transport is prohibitive for the working population to use for commuting rural areas.			
20413 E0	Objection	Policy:	n/a	
249	Mr John Murray Anderson			
Detail	I feel that the development planned on both sides of the B6263 will make a busy road, rat run to M6, even more hazardous.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20476 E1	Objection	Policy: n/a		
261	Mr Graham Watt	Wheatsheaf Inn, Wetheral		
Detail	Wetheral was a farming community and the stripping of farm land is unbelievable. Why not use poor quality land			
20616	Objection	Policy: n/a		
274	Mr Paul Greenwood			
Detail	There is no evidence of consultation with the highways authority, any development to the South of the city is going to impact on the already heavily congested A6. In order to reduce emissions of green house gasses (1.9) there is a need to reduce the use of private vehicles. The cost of public transport is prohibitive for the working population to use for commuting from rural areas.			
20464 E1	Objection	Policy: n/a		
258	Mr & Mrs Brian & Pamela Bishop			
Detail	No			
20459 E1	Objection	Policy: n/a		
257	Mrs Marjorie Jane Wise			
Detail	There is no evidence of consultation with the highways authority. Any development to the south of the city is going to have a significant impact on the already very heavily congested A6. In order to reduce the emissions of green house gasses (1.9) there is a need to try and reduce the use of private vehicles. The cost of public transport can be too prohibitive for the working population to use for commuting to and from rural areas.			
20453 E1	Objection	Policy: n/a		
256	Allen Hodgson Wise			
Detail	There is no evidence of consultation with the highways authority, any development to the south of the city is going to impact on the already congested A6. In order to reduce emissions of green house gasses (1.9) there is a need to reduce the use of private vehicles. The cost of public transport is prohibitive for the working population to use for commuting from rural areas.			
20448 E1	Objection	Policy: n/a		
255	Mr & Mrs McIntosh			
Detail	As services and employment in Carlisle stand at the moment it is struggling to be sustainable. By building more houses we presume you are trying to attract more people to the area. This requires a more radical approach to integrate housing with employment and transport options. The Infirmary, doctors and Primary Schools are already at braking point. These issues need to be addressed alongside any proposed housing development. There is no evidence of consultation with the highways authority, any development to the South of the city is going to impact on the already heavily congested A6. In order to reduce emissions of green house gasses (1.9) there is a need to reduce the use of private vehicles. The cost of public transport is prohibitive for the working population to use for commuting from rural areas.			

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20443 E1	Support	Policy:	n/a	
254	Mr Malcolm Hannah			
Detail	Yes			
20438 E1	Objection	Policy:	n/a	
253	Mrs Louise Holmes			
Detail	No			
20429 E0	Support	Policy:	n/a	
252	Mr Peter Sherrington			
Detail	Yes			
20481 E1	Objection	Policy:	n/a	
262	Mrs Elisabeth Price	On behalf of Mr.and Mrs. C.L.Price		
Detail	I think this is an impossibility.			
20500 E2	Objection	Policy:	n/a	TH04
065		Messrs Parker, Brown, Owens and	A014	
Detail	Site TH02 could provide additional housing to satisfy the acknowledged need for expansion of the village of Thurstonfield. The SA states that Sites TH04 and TH05 could provide some additional housing, but this would still leave a shortfall and site TH02 is available and deliverable.			

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STAGE 2 REPRESENTATIONS

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Stage 2 Chapter HRA

20176 Support Policy: n/a

225 JR & JA Workman

Aoo8

Detail Yes

20414 Eo Objection Policy: n/a

249 Mr John Murray Anderson

Detail Has any account been taken for the wildlife habitats in the area.

20409 Eo Support Policy: n/a

248 Mr Eddie Haughan

Detail Yes

20404 Eo Objection Policy: n/a

247 Mrs Samantha McAlister

Detail No account is taken of the value of wildlife habitats that are not protected by regulations.

20396 Eo Objection Policy: n/a

246 Mr Ken Sutherland

Detail No

RepNo	Status	Paragraph	Page	Stage 2 Map:
Consultee Ref No	Consultees.Contact	Organisation		Agent
20391	Objection	Policy:	n/a	
244	Kate Wheeler	Natural England		
Detail	<p>Please note Natural England's comments are based on the Draft Habitats Regulations Appraisal Summer 2013. However it is noted in the Carlisle District Local Plan 2015-2030 Preferred Options Consultation- Stage Two Spring 2014 document the following:</p> <p>1.27 "In order to comply with the requirements of the Habitat Regulations a Screening Assessment was undertaken at the Issues and Options stage of the Core Strategy. This not only informed the HRA of the Preferred Options, but also identified areas that would require Appropriate Assessment. The draft HRA Report which accompanies this Second Stage Preferred Options has been submitted to Natural England for comment."</p> <p>At the time of consultation Natural England has not received the version of the Habitats Regulations Assessment quoted above, please consult us again once the revised iteration is available.</p> <p>Firstly please note that the policies referred to in the Habitats Regulations Assessment (HRA) are not numbered the same as in the main document and SA, for example Policy 64 - Biodiversity & Geodiversity, is Policy 62 - Biodiversity & Geodiversity.</p> <p>Overall Natural England agrees with the conclusions reached in the HRA, however would wish to raise the following issues, which require further justification. Natural England expects that these issues will be addressed through the updated HRA, which we would be happy to comment on when it is available.</p> <p>Table 3 – Policies requiring further explanation before being screened out, or where mitigation measures are proposed.</p> <p>It appears that quite a few policies screened as potentially having LSE have immediately been screened out on the basis that, "The provisions of Policy 64 – Biodiversity and Geodiversity will ensure the highest level of protections for any European Sites potentially affected by development proposals arising from this policy."</p> <p>Whilst we welcome the inclusion of Policy 64 as a measure to protect European sites from development generally, it should not be used as a mitigation measure to deal with uncertain effects as a result of allocated development sites/ areas. This has the potential to create internal conflict within the plan between policies seeking to promote development against policies to protect designated sites. For example, Policy 2 (Primary Employment Areas) and Policy 3 (Mixed Commercial Areas) both make provision for change of use and also new build through redevelopment. The HRA acknowledges potential impacts as a result of development, including impacts through 'construction, car parking, increased traffic, people, water abstraction, run off.' (Table 3, page 32, HRA). Natural England advises that further detail should be provided to explain how should impacts can be avoided and/or mitigated for. This will give a higher level of confidence that the areas in question can be redeveloped without resulting in adverse effects on European sites and are therefore deliverable.</p> <p>We welcome the detail provided under Policy 19 (Housing Strategy and Delivery) of Table 3, as identified effects are expanded on and proposed mitigation measures outlined (i.e. Drainage measures, SUDs and additional wording to policy H19). This approach should be replicated elsewhere in the HRA, namely in relation to Policies 2 and 3. Whilst Natural England appreciates that the full details of schemes are not yet known, it would still be beneficial to explore how the predicted effects can be resolved at project stage to provide further certainty that projects will be deliverable at the planning application stage.</p>			
20313	Support	Policy:	n/a	
235		Carleton Farm Development Action		
Detail	Yes			
20164	Support	Policy:	n/a	
034	Lucy Adamski			Aoo8
Detail	Yes			

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20241	Objection	Policy:	n/a	
228	Mr Norman Brown			
Detail	Linked to my comments to SA [Rep No 20240], surely the extra traffic, with the associated noise and air pollution must have an effect on this but there is no mention in the report?			
20430 Eo	Support	Policy:	n/a	
252	Mr Peter Sherrington			
Detail	Yes			
20139	Objection	Policy:	n/a	
220	Mr Terrence Ridley			
Detail	Over a period of 34 years a sample of some of the wildlife I have recorded on potential site include roe deer, rabbit, fox, otter, dog otter, pheasant, red legged & grey partridges, stock doves, snipe and peregrine Falcon (Juvenile). Development of this field would be permanent loss of habitat to these numerous and other species.			
20134	Objection	Policy:	n/a	
219	Mr Peter Cottram			
Detail	Developing a plot designated for agricultural use will have a detrimental effect on wildlife etc.			
20525 E2	Support	Policy:	n/a	
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	Yes			
20503 E2	Support	Policy:	n/a	
158/33	Mrs Julie Templeton			
Detail	Yes			
20434 Eo	Objection	Policy:	n/a	
134/6	Mr Nigel Holmes			
Detail	No			

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20041	Support	Policy: n/a		
043	Nigel Winter	Stagecoach		
Detail	Yes			
20297	Support	Policy: n/a		
234	S Nicholson			Aoo8
Detail	Yes			
20472 E17	Objection	Policy: n/a		
260	Mr Garry Leadbetter			
Detail	The proposed two new large estates at the southern end of Wetheral Village will substantially increase car volumes through an already very restricted village centre. The two major supermarkets of Tesco (junction 43) and Asda (junction 44) will draw the majority of vehicles through the village.to the detriment of all village residents..			
20611	Objection	Policy: n/a		
272	Mrs Wendy Daley			
Detail	In particular to the Cumwhinton map areas of surface water flooding have not been included			
20520 E2	Support	Policy: n/a		
269	Mr Andrew Mackay	Tullie House Museum & Art Gallery		
Detail	Yes			
20515 E2	Comment	Policy: n/a		
268	Mr Simon Artiss	Barratt Homes Ltd		
Detail	Same comments as previously [reps 20512 & 50513 E27]- you can't realistically expect all consultee responses to this inline questionnaire to have reviewed these documents.			
20188	Comment	Policy: n/a		
265	Donald Forrester			
Detail	Can find no evidence of any study taking into account the wildlife habitats that are not protect by regulation or other means. We have Bats in the area along with Owls, Thrush, Robins and other small native birds. No idea what kind of wildlife exists in the open fields.			

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20493 E2	Comment	Policy: n/a		
264	Mrs Elizabeth Hill-Gorst	SAVE WETHERAL VILLAGE GROU		
Detail	This appraisal is all very well but we are concerned and experienced that very little notice is taken of this sort of policy/plan and it seems that the needs of the developers are put to the forefront to the disadvantage of any habitat whether named (such as that around the River Eden) or smaller areas already designated under conservation.			
20487 E2	Objection	Policy: n/a		
263	Mr Daniel McViety			
Detail	No account is taken of the value of wildlife habitats that are not protected by regulations.			
20419 E0	Objection	Policy: n/a		
250	Mr David Fordy			
Detail	No allowances made for habitats that are not protected by regulations.			
20477 E18	Objection	Policy: n/a		
261	Mr Graham Watt	Wheatsheaf Inn, Wetheral		
Detail	Has any account been taken of the wildlife that is protected.			
20424 E0	Objection	Policy: n/a		
251	Mr Alistair Martin			
Detail	Has wildlife been taken into account?			
20465 E1	Objection	Policy: n/a		
258	Mr & Mrs Brian & Pamela Bishop			
Detail	Many visiting birds graze/feed in this field.			
20460 E1	Objection	Policy: n/a		
257	Mrs Marjorie Jane Wise			
Detail	No account has been taken for the destruction of a plethora of abundant wild life in that area. The destruction of animal grazing fields or preservation of arable farm land			
20454 E1	Objection	Policy: n/a		
256	Allen Hodgson Wise			
Detail	No account is taken of wildlife habitats that are not protected by regulations.			

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20449 E1	Objection	Policy:	n/a	
255	Mr & Mrs McIntosh			
Detail	No account is taken of the value of wildlife habitats that are not protected by regulations including areas used as corridor routes which would impact on feeding grounds and shelter for wildlife. Once our countryside is destroyed it and its wildlife are lost forever.			
20444 E1	Support	Policy:	n/a	
254	Mr Malcolm Hannah			
Detail	Yes			
20439 E1	Objection	Policy:	n/a	
253	Mrs Louise Holmes			
Detail	No			
20617	Objection	Policy:	n/a	
274	Mr Paul Greenwood			
Detail	No account is taken of the value of wildlife habitats that are not protected by regulations.			
20482 E1	Objection	Policy:	n/a	
262	Mrs Elisabeth Price	On behalf of Mr.and Mrs. C.L.Price		
Detail	I am afraid I am very sceptical about habitats regulations. In my experience I think there is a total regard for any habitas and inhabitants where money,planners and builders are concerned.			

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