

Mr Tony Blackburn
Planning Policy
Carlisle City Council
Civic Centre
Carlisle
Cumbria
CA3 8QG

Date: 21 December 2015

Dear Mr Blackburn

Thank you for your email of the 17th December 2015 regarding Carlisle District Local Plan.

As you will appreciate these are exceptional circumstances and all of our resources are focused on gathering post flood evidence and data which we will share with you when it becomes available. We will continue to work with you and the Inspector for the examination of your Local Plan however, we do not realistically think we will have or be able to provide you with all the data you require to review your sites by the deadline of the 12th of January.

In answer to the Inspectors request for additional comments on specific site allocations and the implications of the recent flood event on sites allocated for development with the Local Plan we can comment as follows:-

While we can provide the data required for the review when it becomes available we have provided our current understanding below. The full response to the questions you ask is a job for consultants employed by yourselves in the same way you would employ consultants to undertake your Strategic Flood Risk Assessment for instance.

Were allocated sites affected by the flooding events?

It is likely but, without comparison of the allocation plan and our developing understanding of the December 2015 outline and other data. This is unknown at this point in time however, we are currently involved in a post evidence and data gathering exercise and will share this with you as soon as it is available.

What we do know that in many areas the Area Benefitting from Defences (ABD) was exceeded. The flood outline in most areas was more extensive than the Flood Zone 3 outline.

If so, which ones and to what extent?

In terms of 'extent' this should also include depth, duration and velocity. The post flood planning review we undertook in 2005 was very site specific, but we could only do this once we had the data. The December 2015 data we have, or are in the process of collating for the City area includes High Resolution aerial photography, data collectors site reports and Community Support Officer reports. This should provide all the data required for the task in the short term.

Do they remain deliverable or developable?

This is not our decision. But our stance has always been that in the City Centre area there should be no new more vulnerable category development in the defended flood cell. Other sites and locations in all categories in flooded areas would benefit from a review.

Does the SA remain an accurate assessment of any affected sites?

Clearly assumptions about probability and risk need a complete rethink in the light of overtopping of defences to a 0.5 Annual Exceedance Probability (equivalent to a 1 in 200 year event)

Do the proposed site allocations remain appropriate?

The National Planning Policy Framework determines appropriateness by cross referencing the flood zone the site is located in, its vulnerability classification in order to determine compatibility/ appropriateness. As above also applies here.

In addition, the Inspector invites the Council and participants that attended the hearing session in relation to Policy HO1 and discussed potential sites not included as site allocations (omission sites) to comment on the impact of the recent flooding, if any, on those sites.

This could be included in the process, once it is identified where the omission sites are.

We will continue to liaise with the Recovery Co-ordination Group (RCG) to enable us all to prioritise our response across Carlisle to support recovery. Our Lead contact on the RCG is Stewart Mounsey.

Should you wish to discuss this matter in more detail please do not hesitate to contact me or Jilly Dougherty our Sustainable Places Lead for Carlisle City Council.

Yours sincerely

Jeremy Westgarth
Environment, Planning and Engagement Manager

cc

Garry Legg