



November 2015

Representor Reference: 089

Representor: Sandra Manson, Signet Planning on behalf of Story Homes Ltd

CARLISLE LOCAL PLAN EXAMINATION

MATTER 3 – HOUSING SITES ALLOCATED WITHIN POLICY H01

Issue 1: Whether Appendix 1 provides sufficient detail to provide clarity to developers, local communities and other interests about the nature and scale of development envisaged on each site (addressing the “what, where, when, and how” questions) in accordance with Planning Practice Guidance (ID12-002)?

Story Homes make no detailed comments in relations to questions 1 and 2 under this issue heading and consider these are queries for the Council to respond to.

Issue 2: Whether the allocated sites are the most reasonable when considered against any reasonable alternatives?

Q1. Is the selection of sites for inclusion in the LP justified having regard to the supporting evidence base in particular the Sustainability Appraisal?

(Note: The Council has recently produced a Statement of Common Ground relating to Site Allocation R15 (Document EL1.005B)).

Story Homes confirm their commitment to the deliverability of the following allocated sites in which they have a legal interest and are in the process of proactively developing up site specific proposals; or implementing consents which have been granted

- Allocation U1 – South East of Junction 44 off M6 – See further response relating to Q3;
- Allocation U6 – Garden Village West of Wigton Road;
- Allocation U7 – New House Farm, Orton Road;
- Allocation U17 – Cummersdale Grange Farm - subject of a live application due for determination in early 2013;
- Allocation R1 – Brampton South of Carlisle Road- application submission anticipated in next 12 months;
- Allocation R10 – Hadrians Camp – Extant planning permission for allocation area with additional land being promoted on part of SHLAA Site H003 (see updated location plan appended for clarification of the additional area beyond the current allocation boundary);
- Allocation R15 – Scotby – Refer to Statement of Common Ground agreed with Carlisle City Council regarding scope for the extending the allocation for the site

Comments relating to the SA and site specifics are set out below, where relevant.

Having regard to the Sustainability Appraisal (SA) relating to allocation R10-land at Hadrian's Camp, the additional area was not considered as part of the SA, however given its limited extension and reflecting the extant planning permission area was assessed, it is considered it would be assessed positively against the SA parameters in a similar manner to the actual allocation. As such it is proposed that a modification to Policy R10 to amend the site boundary and overall quantum of development for the allocation is incorporated as a major modification, with subsequent amendment to the SA to be taken forward as part of consultation on the major and minor modifications in due course.

In relation to allocation R15- Scotby - we refer to the jointly agreed Statement of Common Ground in relation to expanding the site allocation to incorporate the additional area of land that was identified as a proposed housing allocation at preferred options stage 2 of the Carlisle District Local Plan under allocation reference SCOT1. The SA undertaken at the time to inform the iterative development of the plan process will have considered that site as meeting the SA objectives otherwise it would not have been allocated. The question of suitability was relating to access difficulties which have now been resolved.

Q2. Having regard to the representations made pursuant of Regulation 20 in relation to Policy H01 and omission sites, are there any corrections required to the sustainability assessment and if so, would those corrections change the assessments made to the selection of sites for allocation:

Story Homes are promoting additional allocations by way of the following sites:

- Cumwhinton. Peter Gate - SHLAA reference CUW04;
- Houghton Road - SHLAA reference H002; and
- Greenhill, Brampton - SHLAA reference BR14.

Cumwhinton, Petergate - SHLAA site CUW04 is the subject of a live planning application which addresses the issues it was discounted for as a suitable site in the SHLAA process. It has not been considered through the SA for the plan, to which it should be updated to include the site, in addition to amending Policy H01 to identify it as an allocation. This would be taken forward as a major modification and consulted upon in due course, or alternatively the trajectory will need to be updated to reflect it as a consented scheme in the event permission is granted.

Houghton Road- SHLAA site H002 - the site was considered in the existing SA, which discounts the site but has not taken into account any site specific mitigation elements that could be delivered within the site to address issues raised relating to landscape, relationship to the built form of Houghton and in addressing issues relating to educational capacity. The text within the SA does not then align itself with the final commentary on page 70 of the SA which states that the site performs largely positive/neutral overall against the objectives of the SA. It is contradictory to assess the site positively against the objectives but then discount it from final site selection process. It is therefore contended that SHLAA site H002 is supported by the final assessment within the SA, which would support it as an additional allocation to assist in meeting housing requirements.

Land off Greenhill Road - SHLAA site BR14 - the site is considered in the SA, Page 63, which outlines that the site performs largely positive/neutral against the objectives of the SA. It confirms that where uncertainties of potential negative outcomes exist, mitigation measures are in place and further information has been provided.

The justification for its omission from a positive allocation is that when compared to other sites on the edge of Brampton it is considered to have the highest landscape quality and be part of a wider high quality landscape classified in the Cumbria land classification assessment. The SA then concludes that it is considered that the landscape impact of developing the site would be unacceptable. This position is contested and again it seems contradictory for the SA to assess that it is largely positive/neutral against the objectives of the SA and to then discount it from allocation and it should be considered suitable as an allocation to meet the overall housing objectives, with appropriate landscape mitigation being incorporated.

Q3. Notwithstanding the comments of the Inspector in 2008, do Sites U1 and U2 (Land to the South East of Junction 44 of the M6, Carlisle) remain viable in light of the significant infrastructure works required to create access off the A7/C1022

**signalised junction and potential contributions to facilitate primary school places?
What viability assessments have been carried out?**

Story Homes secured planning permission for Allocation U1 by way of outline planning permission ref: 14/0761 for residential development of up to 190 no. dwellings: Access from Kingstown Road. That consent was subject to a Section 106 Agreement which incorporated the requirements for infrastructure delivery to enable the site to come forward, without reliance upon allocation U2.

In progressing the outline consent and committing to the infrastructure requirements in the Section 106, Story Homes have undertaken their internal viability exercise to ensure that the site is deliverable and can confirm they are satisfied that the scheme is viable with a programme to submit Reserved Matters within 12 months and anticipated plot yield in 2016/17.

In addition to the promotion of Allocation U1 in its own right, Story Homes and Carlisle City Council are working closely together in relation to joint infrastructure arrangements to ensure that Allocation U2 is deliverable and has been taken into account in the delivery of Allocation U1.

Q4. What is the outcome of planning applications on the following allocated sites?

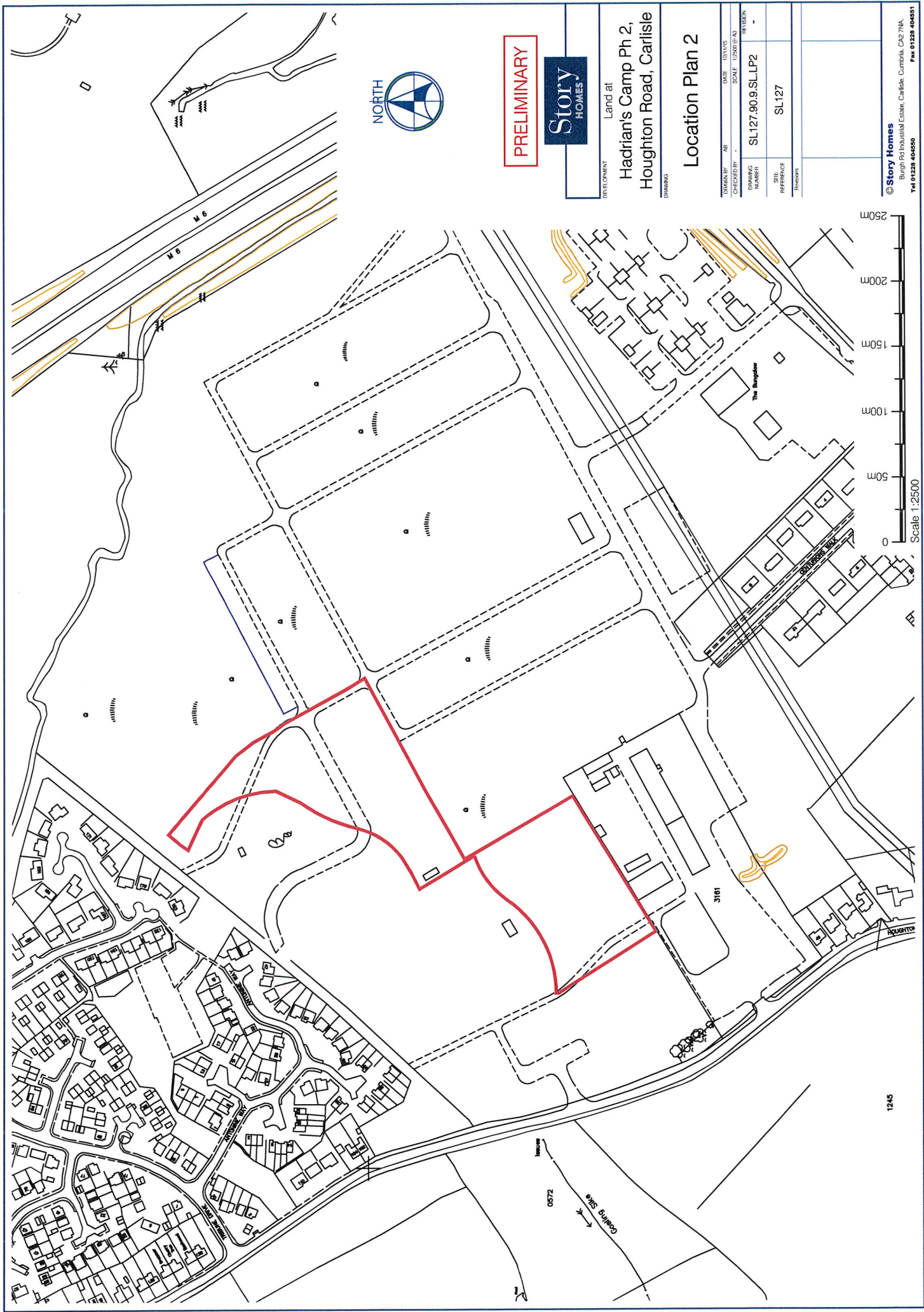
It is understood that Carlisle City Council will submit to the Examination, a comprehensive update on all planning applications for housing sites that have recently been considered and those currently within the pipeline which includes a number of proposals promoted by Story Homes. It is not therefore necessary for us to repeat that information but to reaffirm Story Homes commitment in terms of delivering sites within Carlisle as demonstrated by the progression of planning applications to secure site delivery.

Q5. Are the lower yields reflected in planning application on sites U5 and U10 an indication that the Council is being over optimistic in assessing the yield of sites?

Story Homes has no comments.

Q6. Have any other planning applications been submitted on allocated sites and what is the outcome/expected date for determination?

See response above in relation to Q4, in regard to Carlisle City Council submitting the most up to date position to the Examination.



PRELIMINARY



DEVELOPMENT
Land at
Hadrian's Camp Ph 2,
Houghton Road, Carlisle

Location Plan 2

DRAWN BY	AB	DATE	12/11/15
CHECKED BY		SCALE	1:2500 (P/A)
DRAWING NUMBER	SL127.90.9.SL.P2	REVISION	-
SITE REFERENCE	SL127		
FIGURES			