

REPRESENTATIONS

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

Chapter 01

0336 Comment Policy 1.10

o83 The Coal Authority

Detail Test of Soundness - meets: Effective and Legal & Procedural Requirements Inc. Duty to Cooperate

The Coal Authority is pleased to note that appropriate reference is made at paragraph 1.10 to the emerging Cumbria Minerals and Waste Local Plan forming part of the Development Plan for Carlisle District. This is important, to make plan users aware of the full extent of the Development Plan.

However, in the same way as further information is provided in this paragraph to explain the nature and scope of Neighbourhood Plans, The Coal Authority considers that further information could be included in paragraph 1.10 to make plan users aware that certain policies in the Cumbria Minerals and Waste Local Plan, once adopted, need to be transposed into the District Local Plan, such as the illustration of Mineral Safeguarding Areas onto the Local Plan Proposals Map. Reason – In order to make plan users aware of the various components of the Development Plan for Carlisle District.

Response Comments are noted and the paragraph has been updated accordingly.

Proposed Change The following has been added to the Plan, "The Cumbria Minerals and Waste Local Plan (MWLP) contains mineral and waste specific policies for use in determining planning applications for waste or quarry developments in Cumbria. Certain policies in the CMWLP, once adopted, will need to be transposed into this plan, such as the illustration of the Mineral Safeguarding Areas onto the Local Plan proposals map".

0412 Comment Policy 1.13 - 1.14

096 Rob Naples Northumberland County Council

Detail It is noted that Carlisle City Council has produced a statement of meetings to date, relating to the Duty to Co-operate. Along with regular Cumbria DPOG (Development Plan Officers Group) meetings, details of meetings with neighbouring authorities outside Cumbria, specifically Durham and Northumberland County Councils are also provided. Northumberland County Council would welcome further discussion in relation to strategic cross border priorities under the Duty to Co-operate requirements which would be of benefit to both authorities in the production of future plans.

Response Welcome continued discussions with Northumberland County Council in relation to strategic cross border issues.

Proposed Change None.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0057	Comment	Policy	1.19	009
033	Matthew Good	Home Builders Federation		
Detail	<p>The list of supporting evidence identified on page 9 (paragraph 1.19) indicates that a 'Viability Assessment of the Local Plan' is available as part of the evidence base. It is agreed that this is an essential element of the evidence but at the time of writing this evidence was not available on the Council's website. The lack of this evidence is disappointing as it is a critical part of the evidence base for many of the policies contained in the consultation document. It appears likely that a number of the policies will require amendment following publication of this key piece of evidence. The preparation of this evidence should involve engagement with local developers who will be able to provide advice upon the realities of development economics within Carlisle.</p> <p>In paragraph 1.31 the Council identifies a list of policies which will require consideration in the viability assessment of the local plan. It should be noted that Policy S3 – Design, Policy S4 – Green Infrastructure and Policy 22 – Affordable Housing need to be considered. Whilst the Carlisle Affordable Housing Economic Viability Assessment (AHEVA) published in November 2012 is noted this is not a standalone requirement and the impact of affordable housing needs to be considered in conjunction with other policy requirements and obligations. The viability study also needs to take account of any other policies or obligations likely to impact upon development viability, this should include changing national standards, such as the impending changes to the Building Regulations.</p>			
Response	A full plan viability assessment is currently being undertaken. This assessment will have due regard too all the policies in the Plan which are likely to have a cost implication on developers.			
Proposed Change	No change to Plan as a result of this objection. Viability Assessment will be added to list of evidence once published.			
0487	Comment	Policy	1.32	12
104	Emily Hrycan	English Heritage North West		
Detail	Reference is made to key constraints such as parks, AONBs and amenity spaces. However, reference to the historic environment should be included.			
Response	Comment is noted and agree. Reference has been made within the paragraph to Hadrian's Wall World Heritage Site and Buffer Zone and Conservation Areas.			
Proposed Change	The paragraph has been amended as follows "The map will also show existing land uses such as areas of housing, employment and the City Centre, and areas of protected land such as parks and playing pitches, amenity open space, nature conservation sites including the two Areas of Outstanding Natural Beauty in the District, Hadrian's Wall World Heritage Site and Buffer Zone and Conservation Areas".			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	
1100	Objection	Policy	1.39 - 1.41	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Settlement Boundaries: Paragraph 1.39 -1.41 state that many communities consider that the settlement boundaries are too restrictive and; the NPPF advocates a significant shift away from a hierarchical approach and that LPAs should be responsive to local circumstances etc. However; although the NPPF does not advocate the use of settlement boundaries, neither does it prohibit their use; indeed the term 'settlement boundary' does not seem to appear, at all, in the NPPF, therefore it is permissible to retain, within the Local Plan, clearly defined indicative rural settlement boundaries. These need not significantly inhibit the responsiveness of the LPA (when considering local circumstances and planning housing development to reflect local needs, particularly for affordable housing) but would certainly serve to inform users of the plan, by illustrating, at a glance, the approximate extent of a rural community's expected or defined sense of place. Therefore; it would be both helpful and informative to retain settlement boundaries, in an indicative rather than definitive form, on the Policies Map.</p>			
Response	<p>Settlement boundaries first appeared in the 2008 Local Plan. They were drawn up in response to RPG/RSS policy. They were set at a time of historical and lower levels of housing requirement. RSS has now been abolished, and the housing target for the District is much higher. Settlement boundaries are not supported by the policies set out in the NPPF. Current settlement boundaries are tightly drawn around Carlisle, Brampton and Longtown, and the 20 villages listed in Policy H1 of the Local Plan. This means that there is very little, if any, further scope for development in the future, as Policy H1 largely prevents development outside the boundary. Feedback from various consultation exercises including a number of workshops indicates that there is a level of support for relaxing or removing the settlement boundaries to allow for rural housing development of a scale appropriate to the size of the village, especially where this would help to sustain existing services and facilities</p>			
Proposed Change	There is no proposed change in response to this comment.			
0069	Support	Policy	1.39 - 1.41	13
034	Lucy Adamski		A008	
Detail	<p>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.</p>			
Response	Comment is noted.			
Proposed Change	No proposed change in response to this comment.			

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Chapter 02

0279 Support Policy

077 Mr Alan Hubbard National Trust

Detail The overall Vision is considered to be both consistent with the NPPF and relevant to the specific circumstances of Carlisle. National Trust supports it.

Response Support noted

Proposed Change No response required as a result of this response.

0058 Comment Policy

033 Matthew Good Home Builders Federation

Detail The vision is very general and could relate to most areas across the country. The recognition that Carlisle needs to provide 'a good supply of quality houses' is generally supported. It is, however, considered that a more positive vision would be to provide a good supply of quality houses which meet the district's need for both market and affordable homes.

The 'Housing' and 'Economy' objectives provide positive aspirations for Carlisle. It is important that the Council follow-up these aspirations with a positive policy framework which enables development to take place. To achieve its economic aspirations the Council must recognise the intrinsic link between housing and the economy. This is particularly important when it is considered that Carlisle has a higher than average population who are over retirement age (65+) a trend which is predicted to increase over the period of the plan. Therefore if the Council wants economic growth it will have to provide sufficient housing not only to provide homes for the expanding older population but also to attract younger people to the area to provide an employment pool for the anticipated economic growth.

Response There is generally support from a wide range of organisations for the policy as currently worded. Agree that reference could be made to both market and affordable homes.

Other policies within the Plan seek to provide for a wide range of housing to meet economic growth and attract inward growth and retention younger people alongside the expanding ageing population.

Proposed Change Amend first line of Vision to include 'market and affordable homes'.

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

0488	Support	Policy	17	
104	Emily Hrycan	English Heritage North West		
Detail	The NPPF requires that the Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment. The Vision proposes to protect and enhance the District's heritage assets, which is supported.			
Response	Support noted			
Proposed Change	No change required in response to this representation.			

0176	Comment	Policy	17	
066	Revd. Canon Jan Kearton	The Governing Chapter of Carlisle C		
Detail	We suggest that changing 'good supply' to 'excellent supply' would more closely mirror the housing objective stated on p.90.			
Response	Agree to suggested amendment			
Proposed Change	Amend good housing supply to read 'an excellent housing supply'.			

0021	Objection	Policy	17	
011	Terry Jones			
Detail	The Plan Lacks ambition: I would suggest that the principle ambition of any Carlisle city plan should be to reunite the castle to the city.			
Response	The Council are seeking ways to improve linkages between the Castle and City as part of works to the public realm.			
Proposed Change	No change to policy in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0450	Objection	Policy	17 - 18	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	<p>The final sentence of the Vision on page 17 states "As Carlisle continues to grow the District's heritage assets, important natural landscapes and wildlife species will be protected and enhanced."</p> <p>The text "and habitats" should be added to the sentence after wildlife species as this appears to have been omitted and it makes no sense without.</p> <p>The paragraph on Green Infrastructure on page 18 seems to imply that the natural environment has no intrinsic value in its own right, but only has a value for residents and tourists which contradicts wording on page 33 which states that "biodiversity, landscape and green spaces are to be protected ultimately for the sake of their own natural value". This may be down to poor wording. A suggested rewording is below:</p> <p>To protect, enhance and improve the provision of the green and blue infrastructure of the District for the benefit of the people of Carlisle, visitors and the wider natural environment by protecting and enhancing biodiversity, ecosystem services and sensitive landscapes.</p> <p>The phrase "whilst meeting the need for future development" is not needed in this paragraph as this need for growth is made explicit throughout the rest of the document.</p> <p>Suggest: Add "and habitats" to the final sentence of the Vision</p> <p>Reword the Green Infrastructure paragraph as follows: "To enhance and improve the quality of the green and blue infrastructure of the District for the benefit of people in Carlisle and visitors by protecting and enhancing biodiversity, ecosystem services and sensitive landscapes."</p>			
Response	<p>Agree to amend the wording in the Vision to include 'and habitats' as requested.</p> <p>Green Infrastructure objective amendments to be dealt with under Green Infrastructure comments.</p>			
Proposed Change	<p>Amend section of vision to read: 'As Carlisle continues to grow the District's heritage assets, important natural landscapes and wildlife species and habitats will be protected and enhanced.'</p>			
0897	Objection	Policy	18	
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	<p>There is no mention of heritage of the rural area. The wording in the plan on page 18 should be changed to Carlisle and District and not just refer to Carlisle.</p>			
Response	<p>Whilst references to Carlisle do refer to the District it is agreed that the wording in the objectives can be amended where appropriate to reference Carlisle District or the District to ensure that it is clear where it relates to the District as a whole.</p>			
Proposed Change	<p>Amend objectives where appropriate to refer to Carlisle District not just Carlisle.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0489	Support	Policy	18	
104	Emily Hrycan	English Heritage North West		
Detail	The NPPF requires that the Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment. We welcome the inclusion of heritage as one of the eight objectives in the Local Plan.			
Response	Support noted			
Proposed Change	No change required as a result of this representation			

RepNo	Status	Paragraph	Page	Map
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0490	Objection	Policy	19	
104	Emily Hrycan	English Heritage North West		

Detail

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 16g). 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).
The list of heritage assets is inaccurate:
Listed buildings: 1139 (not 1550)
There should be a full breakdown on the heritage assets in the District.
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 non-designated) 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.
It should be noted that any references to the WHS should be amended to read "Frontiers of the Roman Empire (Hadrian's Wall): World Heritage Site", which is now the official name.
List of suggested amendments given.

Response

The Plan does reflect the historic environment in Carlisle but agree that the section in the spatial portrait could be strengthened to give it greater weight. The Council undertakes Conservation Area appraisals which sit alongside the Local Plan and provide greater detail about each of the designated areas therefore it is not necessary to duplicate this information within the Local Plan itself.
The inclusion of a full breakdown of heritage assets in the Plan would only give the picture at a certain point in time therefore it is considered to be more appropriate to have a dedicated section on the Council's website to provide this detail (which is already available but not within one dedicated place) which would be easily updated as and when changes occur to ensure that the information is always up to date, this would sit alongside the local plan.

Proposed Change

Amend text to read:
In addition to these there are approximately another 1139 Listed Buildings and 19 Conservation Areas including areas within the City, the historic market towns of Brampton and Longtown and Dalston as well as some of the smaller villages. The District's Heritage is an extremely important asset, which contributes significantly to the character and attractiveness of the area and is a major draw for tourism.
2.9 Carlisle District also has a number of locally listed buildings and structures of architectural and historic significance, these are important in creating the locally distinctive character that can be seen in parts of the District. This List will be added to ensure Carlisle's local history continues to be protected alongside both the nationally and internationally recognised assets.
Amend references to Hadrian's Wall World Heritage Site throughout plan to read: Frontiers of the Roman Empire (Hadrian's Wall): World Heritage Site.

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Consultee Ref No	Consultees.Contact	Organisation		Agent
0300	Comment	Policy	25	Key Diagram
078	Mr Trevor Wilson			
Detail	The Map 1 on page 25 omits the rail line to Glasgow via Kilmarnock. - Update			
Response	Agree to amend			
Proposed Change	Update Key Diagram to show rail line to Glasgow via Kilmarnock			
0299	Objection	Policy	2.13	21
078	Mr Trevor Wilson			
Detail	<p>The paragraph attempts to summarise the rail links but in doing so presents a misleading picture and has omissions and inaccuracies. For the A road, paragraph 2.12 you clearly state each main A road, it's direction and destination. So for rail, the same should apply. There is now a direct link to Manchester Airport provided by the hourly Trans Pennine Express services between Glasgow and Edinburgh to Manchester and Manchester Airport. Leeds is not mentioned – there are direct services via the Settle and Carlisle line.</p> <p>Rewrite the paragraph. Suggestion below In terms of rail links, Carlisle has a well served major railway station and junction with numerous rail links used by tourists and commuters as follows:</p> <ul style="list-style-type: none"> - Virgin Trains - West Coast Mail Line – London and Birmingham to Glasgow and Edinburgh - Trans Pennine Express – West Coast Main Line - Manchester Airport and Manchester to Glasgow and Edinburgh - Scotrail – to Glasgow via Kilmarnock - Northern Rail and Scotrail – to Newcastle - Northern Rail –to Barrow and Lancaster via the Cumbrian Coast line - Northern Rail –to Leeds via the historic Settle and Carlisle railway line <p>A considerable volume of rail freight passes through Carlisle using nearly all of the above routes.</p>			
Response	Additional text can be added to detail the rail links as per response.			
Proposed Change	Amend paragraph 2.14 to read: In terms of rail travel, the West Coast Main Line provides the only north/south high speed rail link serving the City connecting Carlisle to Birmingham and London as well as Edinburgh and Glasgow, a service is also provided to Glasgow via Kilmarnock. There is also a direct rail link to Manchester Airport via Northern Rail. There are rail links to Newcastle and the Cumbrian west coast to Barrow and Lancaster. The historic Carlisle/Settle line which is important for tourists, commuters and freight provides a direct rail service from Carlisle to Leeds.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0491	Comment	Policy	2.23 & 2.25	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>Suggest: The Plan should be expended to detail the historic environment throughout the District and the importance of this in relation to tourism should be emphasised.</p>			
Response	<p>The Plan does reflect the historic environment in Carlisle but agree that the section in the spatial portrait could be strengthened to give it greater weight. The Council undertakes Conservation Area appraisals which sit alongside the Local Plan and provide greater detail about each of the designated areas therefore it is not necessary to duplicate this information within the Local Plan itself.</p> <p>The inclusion of a full breakdown of heritage assets in the Plan would only give the picture at a certain point in time therefore it is considered to be more appropriate to have a dedicated section on the Council's website to provide this detail (which is already available but not within one dedicated place) which would be easily updated as and when changes occur to ensure that the information is always up to date, this would sit alongside the local plan.</p>			
Proposed Change	<p>2.9 Carlisle District also has a number of locally listed buildings and structures of architectural and historic significance, these are important in creating the locally distinctive character that can be seen in parts of the District. This List will be added to ensure Carlisle's local history continues to be protected alongside both the nationally and internationally recognised assets.</p>			
1101	Objection	Policy	2.6	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>This section frequently highlights the importance, to its economy, of the districts heritage landscape and biodiversity assets; particularly at paragraph 2.6 which states: "The landscape and wildlife in Carlisle and surrounding districts underpins the economy of the area,"</p> <p>Should the qualitative integrity of these assets be compromised through inappropriate or misinformed development the economic health and overall sustainability of the Carlisle District would suffer significant negative impact.</p>			
	<p>Each Policy in the emerging Local Plan should strongly reflect the value of maintaining and enhancing these fragile, and finite, assets through clear reference to their overarching and vital importance to the areas social and economic wellbeing.</p>			
Response	<p>Comments noted - agree that landscape and wildlife are important to the District and the Plan seeks to ensure protection of these assets.</p>			
Proposed Change	<p>No change to the Plan as a result of this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0434	Support	Policy	S 1	
098		Sainsbury's Supermarkets Ltd	A015	
Detail	Sainsbury's supports Policy N1, particularly the inclusion of the presumption in favour of sustainable development as contained within the National Planning Policy Framework ("the Framework") which is based on the model wording provided by the Planning Inspectorate (PINS). Sainsbury's welcomes this positive and pro-active approach to considering development proposals.			
Response Proposed Change	Support noted.			

RepNo	Status	Paragraph	Page	Map
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Chapter 03

0280 Objection Policy 26

077 Mr Alan Hubbard National Trust

Detail It is not considered that the Objective is consistent with the NPPF and in particular with the definition of sustainable development, i.e. to quote para 6 of the NPPF "The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system". It then goes on in para 7 to set out the three (economic, social and environmental) roles of sustainable development and stresses at para 8 "These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system."

An Objective, as currently proposed, that refers to sustainable development purely in terms of well-designed development to support managed growth fails to adequately take into account the social and environmental roles and ensure that these mutually dependent roles are properly encompassed.

Amend the Sustainable Development Objective so that it is consistent with the NPPF by fully integrating its social and environmental roles.

Response Objective amended to accurately reflect the three dimensions to sustainable development set out in the NPPF.

Proposed Change Objective to Chapter 3 amended as follows:
 - to promote a sustainable pattern of development which will contribute to building a strong, responsive and competitive economy, to support the vision for managed growth;
 - to support strong, vibrant and healthy communities, by meeting the housing needs of present and future generations, in a high quality environment with accessible local services;
 - to contribute to protecting and enhancing our natural, built and historic environment (including improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

0301 Support Policy 3.12 32

078 Mr Trevor Wilson

Detail We support 'For Carlisle this means that the city centre should remain the main focus of retail development.' Development elsewhere should not be to the detriment of the city centre.

Response Comment noted

Proposed Change No change to policy in response to this comment.

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0263 Comment Policy **41**

074 Tim Coombe Sustainable Brampton

Detail Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.

Response Comments are noted. It is recognised that the Plan as a whole needs to be conscious of the potential effects of climate change in the future. The justification of this Policy could be amended to better reflect the potential and importance of community led renewable energy schemes in enabling communities to provide their own power source, thus improving their resilience. Paragraph 7.5 touches on this but this could be expanded to say that policies would give positive weight to renewable and low carbon energy initiatives which have clear evidence of local community involvement and leadership.

Proposed Change This Policy has been amended to state that "It will also positively support community-led initiatives for renewable and low carbon energy where they are in line with this policy, for example community led anaerobic digestion schemes".

0734 Comment Policy **S 1**

154/26/27 Mr Bryan Craig

Detail There is no mention of small Sustainable Communities and the benefits associated with Health and Wellbeing where there are 3 or 4 houses are in a cluster. There is an element of Sustainability where people can share such things as travel and shopping and look after each other when required.

Response Small groups of houses have the potential to provide neighbourly support. However, it is not clear what is being sought by this comment. The NPPF makes provision for enhancing or maintaining the vitality of rural communities by allowing housing to be located where it will do this. The example given is that where there are groups of smaller settlements, development in one village may support services in a village nearby. LPAs are advised to avoid housing in the open countryside. It is considered that groups of 3 or 4 houses would be viewed as open countryside and not as a village. The Plan takes a much more pro-active approach to development in rural communities than the previous Plan, and fully reflects the provisions of the NPPF.

Proposed Change No change to policy in response to this comment.

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0797 Support Policy **S 1**

158/33 Mrs Julie Templeton

Detail I agree with Policy S1. I have concerns that the NPPF within the Presumption of Sustainable Development policy, considers that Economic Development/Growth seems to over-ride every other consideration. I am unclear on how much attention will be paid to the Strategic Flood Risk Assessment, Flood zones 2 & 3 on allowable development when putting forward development plans for the areas covered by the Flood Risk Assessment. I support high standards of design, cultural heritage & development in keeping with the character of the area.

Response Support noted.

Proposed Change

0550 Support Policy **S 1**

120 Possfund Custodian Trustees Limit A019

Detail 1st Paragraph: We agree that it is appropriate for the Plan to include a strong presumption in favour of sustainable development which accords with paragraph 15 of the NPPF.

Response Support noted.

Proposed Change

0144 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 Page 2 of 10 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 out below.

Response Support noted.

Proposed Change

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0190	Support	Policy S 1		
070	Mr R Coad			A013
Detail	<p>We support the inclusion of Policy S1 in the Plan 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.</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 below.</p>			
Response Proposed Change	Support noted.			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

0262 Comment Policy **S 1**

074 Tim Coombe Sustainable Brampton

Detail
 Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.

Community led renewable energy generation schemes are a highly attractive way of meeting wider sustainability targets whilst also promoting economic growth and providing social benefits. Brampton and Beyond Energy (BABE) is a good example of one such project which seeks to benefit from seed-corn investment by the Rural Community Energy Fund (RCEF) sponsored by the DECC and administered through the Waste and Resources Action Programme (WRAP). Investment advice will be provided through Rural Cumbria Connects (RCC), a group of independent advisors who are committed to resourcing and administering multiple community based renewable energy projects. [further comments made regarding aims and how further achievement could be attained]

Rural communities spend a higher proportion of their disposable incomes on transport than on either electricity or heat. Sustainable transport is acknowledged in Objective 11 of the SA to help promote healthier lifestyles but spiralling transport costs nationally are already significantly affecting the wider sustainability and economic resilience of those living in remote rural areas. Policies are urgently required to help reduce future transport costs in areas where limited or no public transport is ever likely to exist. Electric bikes and cars offer one potential solution for rural transport as does converting vehicles (even tractors) to use methane as a fuel (methane being an important by-product of an AD plant). Innovative thinking will be required to provide solutions that address these long term issues and their importance should be reflected in the priority given to the provision of a 21st Century transport infrastructure and non-fossil fuel based forms of transport in the Local Plan for rural areas.

Response
 There is substantial merit to many of the ideas and proposals put forward in this comment. However, many of the policy suggestions would not translate into planning policies, for example, converting vehicles to use methane as a fuel, or using electric bikes and cars. Community resilience will be aided by the policies in the Plan which seek to meet a community's housing needs, deliver infrastructure etc, or allow renewable energy, protect valued landscapes and biodiversity etc. However, other initiatives, such as sustainable food initiatives, would not require a local plan policy, but would be better addressed through a community plan.

Proposed Change
 No change to policy in response to this objection.

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

0386 Objection Policy **S 1**

090 Elizabeth Allnutt

Detail

Sustainable development relies on three interdependent roles for delivery; economic, social and environmental. There seems to be an underlying assumption in this policy that development will be supported if at all possible. The last two paragraphs in the box at the top of p30 where it says (with provisos) that applications will be approved swiftly and that if there are no relevant policies the Council will grant permission, indicate that priority will be given to development i.e. supporting the economic role of sustainable development while the social and environmental roles are given a lesser priority. This preference for economic over social and environmental roles is further seen in the Transport section of the Infrastructure Delivery Plan (as available in August 2013 on the City Council's web site). This states that the Council will seek to work closely with the private sector through the Local Economic Partnership to identify opportunities for new developments that help bring about a thriving local economy. While it is not disputed that a thriving local economy is probably advantageous there is no mention here of the other elements – social and environmental - which contribute to sustainable development and which must be considered at all levels – in delivery as well as in planning. It should also be noted that there is more to the business sector than just private enterprise. There needs to be careful consideration and positive support for social enterprises and cooperative businesses. There needs to be a recognition of the role they play in delivering a real grassroots local economy and how they will address the social (and probably environmental) aspects of local enterprise in delivering sustainable development. In the Sustainability Appraisal this appears as green; this policy should be reappraised.

Require: This imbalance should be redressed and equal priority given to all three strands. Social and environmental roles should be playing an equal role to economic ones. There is a fear that social and environmental concerns may only be addressed through objections to applications. The presumption to grant planning permission, even with the provisos indicated, should be removed and replaced with a more balanced approach. The Infrastructure Delivery Plan needs to be completed and consider the issues of social and cooperative enterprises.

Response

Policy S1 is a model policy produced by the Planning Inspectorate and required to be included for the Plan to be found sound. However, it is acknowledged that the sustainable development objective needs to be expanded to accurately reflect the three dimensions set out in paragraph 7 of the NPPF i.e. an economic, social and environmental role.

Proposed Change

Objective to Chapter 3 amended as follows:
- to promote a sustainable pattern of development which will contribute to building a strong, responsive and competitive economy, to support the vision for managed growth;
- to support strong, vibrant and healthy communities, by meeting the housing needs of present and future generations, in a high quality environment with accessible local services;
- to contribute to protecting and enhancing our natural, built and historic environment (including improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

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

0070 Support Policy **S 1**

034 Lucy Adamski Aoo8

Detail Considered to be an appropriate and considered approach in accordance with the central thrust of the NPPF.

Response Support noted.

Proposed Change

1102 Objection Policy **S 1**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail Insert requirement that all proposals should pursue the ideals of sustainable development, including self sustainability and that, excepting for not for profit developments, proposals dependent upon any form of subsidy cannot, therefore, be considered to be sustainable.

Paragraph 1:

This is an overarching strategic policy and so should embody, from the outset, a provision advocating community consultation. Therefore; after "work proactively with applicants..." it would be appropriate to insert 'and communities'

Paragraph 2:

Use of the phrase "will be approved without delay" is very prescriptive and could easily open the door to the LPA, being forced to act in haste and repent at leisure- perhaps in the company of some unfortunate community. Some flexibility of should be retained here, e.g. by replacing the phrase with "will be approved as soon as practicable". This expedient would then accommodate any unforeseen delaying circumstance which may arise.

Policy S1 should retain elements of superseded policy DP1 i.e.: Proposals for development should be assessed on the basis of the need for development to be in the location specified and; priority should be given to the re-use of previously developed land, with particular emphasis on vacant and derelict sites and buildings within the urban area.

Response Whilst this is a model policy produced by the Planning Inspectorate, and recommended in order for plans to be found sound, there is some merit in making provision within the policy to work proactively with communities.

Proposed Change Second sentence of policy, add 'and communities' after 'work proactively with applicants'.

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

0320 Support Policy **S 1**

081 HS Cartmell A013

Detail We support the inclusion of Policy S1 in the Plan 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.

Response Proposed Change Support noted.

0906 Comment Policy **S 1** 27

189 Mrs Janet Whitworth University of Cumbria

Detail In the comments received previously there is reference to the University – 'the University has a role to play in achieving the sustainable growth ambitions of the city'. We welcome this comment, however, would like to see greater emphasis on the University as a key collaborative enabler in achieving sustainable growth ambitions, particularly in reference to the development of a younger demographic within the City and the potential to improve social and cultural ethnicity. We would like to see reference in the policy itself to the supporting of the sustainable growth of the University, both as part of Carlisle, so that Carlisle becomes recognised as a 'University City', but also in supporting the principle of widening participation as a central strategic objective, to raise attainment and aspiration levels in the broader population.

Response Policy S2 is considered to be a more appropriate policy in which to reference the role of the University. Following the publication of the National Planning Policy Framework ('the Framework') planning authorities with adopted plans or plans in preparation will need to consider which, if any, parts of those plans need updating. The Framework states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally (paragraph 15). The Planning Inspectorate considers that this model wording will, if incorporated into a draft Local Plan submitted for examination, be an appropriate way of meeting this expectation. Policy S1 is the PINS model policy.

Proposed Change No change to policy in response to this comment.

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

1103 Objection Policy S 2

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail

The consultation responses outlined on page 30 states that:
 "Most responses called for a focus on the south of the city to improve transport links and the employment offer around J42 of the M6;"
 Respondents also make significant reference to exploiting the opportunities created through the opening of the Carlisle Northern Development Route (CNDR). However; the policy fails to clearly advocate development to Carlisle West and South through exploitation of the CNDR', the only references to these areas of the city being to the vague 'preferred option' of identifying a broad location for housing growth in the area of Carlisle South during plan years 11-15 (i.e. only 4 years of a 15 year plan); and the development of an un-specified amount of employment land south west of Morton.
 In contrast the policy does propose the development of:
 "a high value employment area to attract high value jobs in a location which utilises the M6 corridor, and an employment facility at the Harker Industrial Estate that requires a major electricity supply due to its proximity to Harker substation". And the development of "employment land at Kingmoor Park (including Brunthill)"
 This approach can only result a continued unbalancing of the city as further extensive development is focused north of its centre.
 Overall Policy S2 comprises simply of a wish list of objectives, rather than focused policies for attaining objectives; thus it may be viewed as being rather amorphous and generally unfit for purpose.

Response

In respect of the employment allocation this is detailed in policy 1 of the preferred options stage 2 Local Plan which includes a site location plan and site area of 8ha for B1 use.
 The Stage 2 Plan also includes a new policy on Broad Location for Growth :Carlisle South which provides an overview of the land allocation setting out that it will a major mixed use urban extension to be delivered from 2025 onwards unless monitoring indicates the necessity to bring it forward sooner.
 The continued support for the employment land at Kingmoor Park including the allocation of the Brunthill is wholly appropriate as the site is operational and provides significant employment opportunities with good highways connections.
 The employment facility at Harker is linked to a very specific type of user with specific locational requirements - site options are limited, the site at Harker meet the requirements of the low impact use.

Proposed Change

No change proposed as a result of this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0321	Objection	Policy S 2		
081		HS Cartmell	A013	
Detail	<p>In line with the principle requirements set out in the NPPF with regard to significantly boosting housing to meet objectively assessed needs, we propose amendments to bullet point 1 of Policy S2 to read "deliver at least 9750 dwellings over the next 15 years ... which averages 650 houses/year". This is reconfirmed in our suggested amendments to Policy 19 [see rep 0325].</p> <p>In addition, we have concerns that the Council suggests that it will only rely on broad locations for growth in Carlisle South for the 11 – 15 year period of the plan. This is not considered the most appropriate strategy. It is vital to meet the housing needs and demands across the whole of the district, during the whole plan period, not just within Carlisle City. Whilst we support, in principle, Policy S2, growth of the district must not neglect rural areas. Smaller settlements in the district should be allowed to grow to ensure that local services remain viable. The NPPF states that the location of new housing development in rural areas should enhance or maintain the vitality of rural communities.</p> <p>Furthermore, it is considered that additional explanation and justification is required within the policy and its supporting text to define the difference between the Urban Areas and the Rural Areas within the district. The policy, as it stands, states that 70% of the annual development will be in Urban Areas, however, is this restricted to Carlisle only or does it include other settlements? Further clarification is requested on this matter to ensure that the plan is accurate and avoids potential confusion when it comes to interpreting policy. Reference to a settlement hierarchy may be considered beneficial here.</p>			
Response	<p>Policy has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period, therefore allocations for housing are being included for years 1-5 of the Plan.</p> <p>The Plan includes an allowance for windfall over the entire Plan period therefore development needs will still be met outside the Carlisle south area in line with the concerns raised.</p> <p>Further clarification as to the area defined as 'Urban Carlisle' will be included in the supporting justification for the policy to improve understanding.</p>			
Proposed Change	<p>Amend policy criterion 1 to read: Deliver 665 dwellings per annum for the next 15 years, 70% located in the urban area of Carlisle, and 30% in the rural area. Sites have been allocated for years 0-10 in the Plan period.</p> <p>Clarify wording in paragraph 3.11 to read: This approximates to 70% in urban Carlisle, and 30% in the rest of the rural area, which includes Brampton and Longtown.</p>			

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

0588 Comment Policy S 2

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail
Housing and Level of growth
Allerdale and Carlisle do not share Housing Market Areas and from their evidence base (both in terms of land supply and infrastructure capacity) there is no cross boundary issue in terms of capacity to deliver. As with Carlisle, Allerdale have a significant number of housing commitments.
The proposed level of growth is ambitious but does not necessarily cause cross boundary issues. In discussions during preparing both local plans it was acknowledged that Carlisle is a sub-regional centre but that role does not inhibit the role of Wigton, located in Allerdale. Wigton is a market town that operates as a strong local centre that meets local housing, employment and retail needs for the town and its rural hinterland. Its role is complementary to Carlisle. [see also rep 0589 Policy 19]

Response Noted. Carlisle will welcome further discussions with Allerdale under the Duty to Cooperate, to continually review the requirement under the duty.

Proposed Change No change to Plan in response to this comment.

0577 Comment Policy S 2

124 Ediston Properties/Whitbread Group A020

Detail
A number of sites/areas of land within the plan area, including the urban area of Carlisle, are developed but are not allocated in the local plan for any specific use or form of development. This includes in the contexts of their current uses or what new uses might be supported should the existing development be promoted for a new use/form of development through a redevelopment proposal. This applies to land currently controlled by Whitbread Group Plc adjacent Junction 44 of the M6 with A7/Kingstown Road, Kingstown, Carlisle which is currently in use as a Premier Inn.
Such sites are brownfield in terms of their character and are seen by NPPF as offering considerable scope for new uses/ developments and as such represent a priority, certainly when compared to greenfield development opportunities. In addition, such sites by reference to their locations and relationships to other uses and infrastructure often fall within the category of highly sustainable sites making them highly suitable for many different forms of new development.
In view of this the representation feels that an additional bullet point should be added to this policy which reflects this point, i.e., that in sequential terms brownfield sites should be a priority for new development. A suggested form of words is as follows:

- 'Make the best use of existing developed/brownfield sites for new development particularly those which have the potential to contribute towards local plan new development and sustainability objectives.'

Response Agree to adding additional criterion to reflect objectors comments regarding previously developed land.

Proposed Change Add additional bullet point to read: Make the best use of previously developed land for new development particularly in locations which have the potential to contribute towards the Local Plan objectives.

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

0559 Objection Policy **S 2**

121 Mike Fox Brampton Economic Partnership

Detail
 A major concern on the document is that 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.
 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.
 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.
 [Comment supported by Burtholme Parish Council]

Response
 The Local Plan covers the whole District not just Carlisle City Centre. Policies in the Plan will reflect issues in the whole Plan. Housing development in Brampton will help to contribute towards Brampton being a vibrant 21st Century market town. Housing developments are part of the plans for Brampton but new houses can help contribute to new facilities and develop existing services that can help have a positive impact on the town.

Proposed Change
 No change as a result of this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0191	Objection	Policy S 2		
070	Mr R Coad			A013
Detail	<p>In line with the principle requirements set out in the NPPF with regard to significantly boosting housing to meet objectively assessed needs, and our suggested amendments to Policy 19 set out below, we propose amendments to bullet point 1 of Policy S2 to read "deliver at least 9750 dwellings over the next 15 years ... which averages 650 houses/year".</p> <p>In addition, we have concerns that the Council suggests that it will only rely on broad locations for growth in Carlisle South for the 11 – 15 year period of the plan. This is not considered the most appropriate strategy. It is vital to meet the housing needs and demands across the whole of the district not just Carlisle City.</p> <p>Whilst we support, in principle, Policy S2, growth of the district must not neglect rural areas. Smaller settlements in the district should be allowed to grow to ensure that local services remain viable. The NPPF states that the location of new housing development in rural areas should enhance or maintain the vitality of rural communities.</p> <p>Furthermore, it is considered that additional explanation and justification is required within the policy and its supporting text to define the difference between the Urban Areas and the Rural Areas. The policy, as it stands, states that 70% of the annual development will be in Urban Areas, however, is this restricted to Carlisle only or does it include other settlements? Further clarification is requested on this matter to ensure that the plan is accurate and avoids potential confusion when it comes to interpreting policy. Reference to a settlement hierarchy may be considered beneficial here.</p>			
Response	<p>Policy has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period, therefore allocations for housing are being included for years 1-5 of the Plan.</p> <p>The Plan includes an allowance for windfall over the entire Plan period therefore development needs will still be met outside the Carlisle south area in line with the concerns raised.</p>			
Proposed Change	<p>Further clarification as to the area defined as 'Urban Carlisle' will be included in the supporting justification for the policy to improve understanding.</p> <p>Amend policy criterion 1 to read: Deliver 665 dwellings per annum for the next 15 years, 70% located in the urban area of Carlisle, and 30% in the rural area. Sites have been allocated for years 0-10 in the Plan period.</p> <p>Clarify wording in paragraph 3.11 to read: This approximates to 70% in urban Carlisle, and 30% in the rest of the rural area, which includes Brampton and Longtown.</p>			

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

0351 Comment Policy **S 2**

088 Elizabeth Allnutt Save Our Streets

Detail

The future of the Rickergate community is closely connected with the long term plans for the City Centre. It is extremely difficult for SOS to comment on aspects of this policy with no clear information about the City Centre in the absence of the City Centre Masterplan.

In the widest sense SOS would support the policy to strengthen and protect the city centre to create sustainable centres where services and facilities would be provided by balanced growth. This would benefit the small businesses in Rickergate and the presence of a residential area close to the city centre should contribute to the life of the City Centre after 5pm.

However, the support for this policy WILL NOT be at the expense of our community. SOS could not and would not support any policy which undermined the community of Rickergate. Whole hearted support for this policy cannot be given until there is clarity around the plans for the City Centre and the City Centre Master Plan is available to feed into the overall long term Policy.

SOS would also support the policy to maintain and enhance the importance of the environment, heritage and landscape aspects, once it is clear how these will be dealt with in the City Centre

SOS would support the policy on addressing the impact of climate change particularly where flooding issues are concerned.

SOS would support the achievement of high standards of design and sensitivity to character, setting and cultural heritage, once it is clear how these will be dealt with in the City Centre Master Plan.

Further new housing has been proposed for Rickergate in the past (Renaissance schemes). SOS notes that there would be a policy-based approach for housing on non-allocated sites. While this is acceptable in principle, SOS would wish to see what approach to housing is included in the City Centre Master Plan before commenting further.

Response Comments noted. The stage 2 preferred options plan includes more detail on the City Centre resulting from the work undertaken so far on the masterplan, and following on from the consultation on the city centre masterplan site options consultation which took place Nov-Dec 2013.

Proposed Change No change proposed to the Plan as a result of this objection.

0798 Support Policy **S 2**

158/33 Mrs Julie Templeton

Detail

I broadly agree with the key comments printed under Consultation So Far. I agree with sustainable transport links. I think that more secure cycle parking places should be made available within the city centre. I think that more employment opportunities should be created in the South of the city and not concentrated in the North of the city. I agree that the city centre should be protected and allowed to grow sustainably taking into account already established communities.

Response We appreciate the support provided for this policy. In respect of employment opportunities to the South of the City the Carlisle South masterplan will look to bring forward employment opportunities in the south to take advantage of the opportunities presented by the proximity of the M6 corridor.

Proposed Change No change to policy required as a result of this comment/support.

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

0145 Comment Policy **S 2**

062 Church Commissioners for England A013

Detail

We have concerns that the Council suggests that it will only rely on broad locations for growth in Carlisle South for the 11 – 15 year period of the plan. This is not considered the most appropriate strategy. It is vital to meet the housing needs and demands across the whole of the district not just Carlisle City. Whilst we support, in principle, Policy S2, particularly the development at Morton, growth of the district must not neglect rural areas. Smaller settlements in the district should be allowed to grow to ensure that local services remain viable. The NPPF states that the location of new housing development in rural areas should enhance or maintain the vitality of rural communities. This will prevent the rural population diminishing and the loss of rural services and facilities. Furthermore, it is considered that additional explanation and justification is required within the policy and its supporting text to define the difference between the Urban Areas and the Rural Areas. The Policy, as it stands, states that 70% of the annual development will be in Urban Areas, however, is this restricted to Carlisle only or does it include other settlements? Further clarification is requested on this matter to ensure that the plan is accurate and avoids potential confusion when it comes to interpreting policy. Reference to a settlement hierarchy may be considered beneficial here.

Response

The Plan includes an allowance for windfall over the entire Plan period therefore development needs will still be met outside the Carlisle south area in line with the concerns raised.

Further clarification as to the area defined as 'Urban Carlisle' will be included in the supporting justification for the policy to improve understanding.

Proposed Change

Clarify wording in paragraph 3.11 to read: This approximates to 70% in urban Carlisle, and 30% in the rest of the rural area, which includes Brampton and Longtown.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0985	Objection	Policy	S 2	
194	Michael Barry	Cumbria County Council		
Detail	<p>Role of Settlements - Background information submitted. Suggested Changes: The Local Plan should contain a policy that defines a role for settlements and explains the forms of development that may be appropriate at them. To ensure the flexibility the City Council are seeking to achieve, this policy could also identify clusters of villages that, in practice, share services and where some development would be acceptable subject to standard criteria around design, scale etc.</p> <p>Housing - Background information submitted. Suggested Changes: The Local Plan phases the implementation of the annual housing requirement, increasing it over the plan period to coincide with the delivery of individual housing sites and infrastructure (e.g. rising from 450 to 500 to 550 to 600 to 650) to achieve the average annualised dwelling requirement for 600 homes per annum.</p> <p>Commercial and Employment Proposals - Background information submitted. Suggested Changes: It is considered that this policy should refer to a further employment site close to Junction 42 of the M6.</p> <p>Longer Term Growth - Background information submitted. Suggested Changes: The Local Plan should contain a separate policy that addresses the broad location for growth in South Carlisle and highlights some of the infrastructure that may be required to support this.</p> <p>Climate Change - Background information submitted. Suggested Changes: The text supporting this policy would benefit from making reference to localised/surface water flooding as an area of risk.</p>			
Response	<p>The NPPF does not specify a settlement hierarchy approach to housing development in rural areas. It states that LPAs should be responsive to local circumstances and plan housing to reflect local needs. Housing should be located where it will enhance or maintain the vitality of rural communities. This is interpreted as being about more than local services and facilities within a village, and extending to such things as housing for new families within a village, diversifying the age range of residents of a village, allowing young families to build a home in a village where they have connections, or allowing housing to meet a special need in a village where the occupiers have local connections - socially sustainable development, as well as economically sustainable. If housing is only allowed in villages with a defined level of services, all the other villages will fall into a sustainability trap, and fail to thrive.</p> <p>Sites have been assessed against a number of criteria including biodiversity, landscape, heritage, flooding, access issues etc.</p> <p>We consider that it is not appropriate to identify clusters of settlements as this may change over the Plan period depending on the presence of services and facilities. By not defining these within the Plan it allows for flexibility if services were to open and close.</p>			
Proposed Change	<p>No change proposed to the Plan as a result of this objection.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0481	Objection	Policy	S 2	
103		Kingmoor Park Properties	A017	
Detail	<p>It identifies a proposal to develop an employment facility at Harker Industrial Estate that requires a major electricity supply due to its proximity to Harker substation. It is unclear what has driven this approach as it is not mentioned in the supporting evidence base. This is considered further in the assessment of Economic policies later in this representation. The Policy also makes reference to developing a high, value employment area to attract high value jobs in a location which utilises the M6 corridor, but it does not confirm where this might be and therefore fails to push alternative employment opportunities to the south as clearly as it could. Given that sites are identified in the Preferred Options it would seem remiss of the Council to not identify the site at this stage, as this would provide a steer into the Council's approach to the north –v- south economic strategy.</p> <p>Full support is afforded however to the principle of developing employment land at Kingmoor Park including Brunthill. Kingmoor Park and Brunthill score highest of all employment sites in the District when assessed by the Council in the Carlisle Employment Sites Study: Implications for the M6 Corridor (June 2010), and it is therefore entirely correct that policies should seek to promote development here.</p>			
Response	<p>The policy is strategic in nature and therefore recognised the importance of the M6 corridor as an economic driver. It is intentionally worded flexibly to not hinder appropriate opportunities for employment development. The Preferred Options Stage 2 Plan includes a new policy (3) which focuses on the Broad Location for Growth: Carlisle South, the policy states that opportunities for employment will be created as part of the Carlisle South masterplan. This policy shows the intent within the Plan to rebalance employment land provision through the masterplanning exercise which will commence once the Plan has been adopted. Policy S2 will have additional text added to refer to J42 of the M6.</p>			
Proposed Change	<p>Additional text to be added to criterion 3 to read: Develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor including the area around J42.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0071	Objection	Policy	S 2	
034	Lucy Adamski			Aoo8
Detail	<p>Objection in principle on the basis of the failure to allocate any sites for new housing development during years 1-5 of the Plan. The current approach of not supporting new housing development on any of the allocated sites within the draft Plan until year 6 is considered to be tantamount to a moratorium on new house building via allocations. As a consequence, land prices could well be artificially enhanced in favour of other suppliers of new housing and, by the same token, reduced on allocations as they are unable to enter the market on an equitable basis. This simply reduces the choice and growth that the Plan and the NPPF advocates as a matter of principle.</p> <p>The borough has suffered persistent under delivery of housing numbers and choice over a number of years and reliance upon the SHLAA; commitments and windfalls; to the 100% exclusion of allocated sites that have been the subject of detailed consideration, including formal Sustainability Assessment, is considered to be extremely short-sighted. The impact is to, in effect, allocate sites then take away the relative certainty this brings to locations, landowners and developers, by imposing an artificial barrier to delivery. The situation is compounded in settlements where allocations are limited to a single site.</p> <p>The approach currently being taken in the Plan is therefore contrary to the NPPF in so far as key sites that have been identified as being critical to the delivery of the housing strategy over the plan period, both market and affordable, will be fettered unnecessarily with the resultant impact being limited choice of location and housing type.</p> <p>Recommendation: Reverse the extreme approach and hence current imbalance being taken on allocated sites such that they are no longer identified as year 6-10 sites (sites more generally associated as being locationally less specific than allocated sites) and afford them a level playing field of opportunity within years 1-5 that the SHLAA; commitments and windfall sites currently enjoy so as to support housing choice and growth on an equitable basis.</p>			
Response	Policy has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period, therefore allocations for housing are being included for years 1-5 of the Plan.			
Proposed Change	Amend policy criterion 1 to read: Deliver 665 dwellings per annum for the next 15 years, 70% located in the urban area of Carlisle, and 30% in the rural area. Sites have been allocated for years 0-10 in the Plan period.			
0929	Objection	Policy	S 2	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	<p>Cycle Ways - need significant improvement all around and in Carlisle. Reinforce.</p> <p>Housing in the Rural Areas: 30% = 180 houses per year with the presumption that the majority will be in Longtown and Brampton.</p> <p>Rural development should be restricted to no more than 5 houses per development outside Key Service Centres.</p>			
Response	<ol style="list-style-type: none"> 1. Cycling is recognised in the Local Plan in Policy S4 and Policy 34. Strengthening the importance of cycling within these policies will be considered. 2. 30% of the allocated housing in the Local Plan will proposed for the rural area. The plan supports existing centres to help create sustainable centres where adequate services and facilities would be provided by balanced growth. There are no specific centres identified in the rural area that would accommodate a certain level of growth to allow flexibility in future delivery. 3. There is no evidence to suggest why this figure has been selected and why it would be appropriate to adopt such a policy that could restrict sustainable development, which could potentially be contrary to national guidance that seeks to promote sustainable development. 			
Proposed Change	No change to policy as a result of this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0112	Comment	Policy	S 2	
051		Story Homes Ltd		A010
Detail	In particular point 1 and allocation of sites starting years 6-10. The Council should ensure that a consistency of development is ensured and as such land should be, if not allocated, then able to come forward if either allocated or in an acceptable location in order to maintain housing supply.			
Response	Policy has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period, therefore allocations for housing are being included for years 1-5 of the Plan.			
Proposed Change	Amend policy criterion 1 to read: Deliver 665 dwellings per annum for the next 15 years, 70% located in the urban area of Carlisle, and 30% in the rural area. Sites have been allocated for years 0-10 in the Plan period.			

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

0059 Objection Policy S 2

033 Matthew Good Home Builders Federation

Detail

The Spatial Strategy is considered unsound as it is not positively prepared or justified by the Council's evidence on an objectively assessed need for housing. The Council indicates that it aims to provide 9,000 homes over the 15 years of the plan (2015 to 2030) providing an annual requirement of 600 new dwellings per year. It is unclear why the Council has chosen this figure and departed from the 2011 report on Housing Needs and Demand. This report identifies in paragraph 11.15; '.....around 545 homes would be required each year to maintain the working-age population, with 665 homes a year required to support forecast economic growth (based on Jan 2011 employment forecasts to 2025).....'

The requirement for 665 homes per year to support economic growth would appear to be a realistic starting point for considering an objectively assessed need for housing. The Council has not indicated if such a figure has been considered and if so why it has been disregarded in favour of the lower figure of 600 per annum. The provision of only 600 new dwellings per annum effectively reduces the overall plan requirement by nearly 1000 homes.

The Council also has an acknowledged affordable housing shortage. The 2011 Housing Needs and Demand Study (HNDS) identifies a shortfall of 708 affordable units per annum (page 108). This figure is 108 dwellings per annum above the overall housing figure suggested within the draft strategy. Such 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. It is, again, unclear whether a requirement of 708 new dwellings per annum has been considered or why such a requirement has been disregarded in favour of the proposed figure of 600.

The housing need within Carlisle also needs to be considered in the context of neighbouring authorities, some of whom are also under-providing against their objectively assessed need. Carlisle is bordered by the English Local Authorities of Allerdale, Eden and Northumberland as well as Scotland to the north. The northern parts of Allerdale were identified in the regional SHMA as being within the same market area as parts of Carlisle and the settlements within that area were identified as playing a complimentary role to Carlisle in terms of serving local housing and other markets particularly in relation to their rural hinterland. The actions of Allerdale are therefore of direct significance to Carlisle. (expansion on Allerdale Housing figures is given).

Delivery: The policy identifies 70% of the housing requirement will be located in the urban area of Carlisle, whilst 30% will be in the rural area. The delivery of this requirement is questioned given that the 2012 Affordable Housing Economic Viability Assessment (AHEVA) identifies the urban areas suffer from the greatest viability challenges. The Council will be aware that in order to maintain a 5 year land supply, and therefore ensure its plan remains up to date, it must be able to demonstrate delivery. The issue of delivery is further complicated by only allocating sites for years 6-10 with broad areas of search for years 11-15. To maintain delivery the Council will need to ensure that enough sites are developed in years 1 to 5 together with identifying how land will be released in years 11 to 15. Such a policy could also include criteria to bring forward sites within the broad areas of search should its allocations and existing permissions not deliver at the rates predicted. This would provide flexibility within the plan (NPPF paragraph 14) and ensure that the Council maintained its 5 year supply, hence ensuring the plan remains up to date.

Recommendation: It is recommended that the Council reconsiders its housing strategy and plans more positively in accordance with its own evidence. If the Council is truly committed to economic growth and meeting the objectively assessed needs for both market and affordable housing, as required by the NPPF, this figure should be in excess of 665 dwellings per annum over the plan period.

The Council should also carefully consider the deliverability of its spatial strategy and may wish to consider a policy which would facilitate early release of either allocated sites, or sites within the broad areas of search prior to their anticipated phasing.

Response

The housing target has been amended to 665/yr based on the HNDS. Continued dialogue with Allerdale highlighted that there was not an issue of overlapping housing markets - the response received from Allerdale states they do not believe Carlisle and Allerdale share a housing market area. Housing delivery has been brought forward in response to the consultation.

The northern parts of Allerdale were identified in the regional SHMA as being within the same market area as parts of Carlisle and the settlements within that area were identified as playing a complimentary role to Carlisle in terms of serving local housing and other markets particularly in relation to their rural hinterland. The actions of

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Allerdale are therefore of direct significance to Carlisle. (expansion on Allerdale Housing figures is given).And includes a backlog figure of 827 (from 2008) which is spread over the Plan period at 55/year. Backlog has been spread over the Plan period on the advice of the Planning Inspectorate in a compliance meeting, where it was advised that delivery was an issue in Carlisle district due to the shortage of volume housebuilders. The housing target represents net completions, and the Council's monitoring of housing supply shows net completions. The table in Policy 19 has been revised to show:
District Target; Housing Required 2015 to 2030 [split as in criteria 2]; Backlog from 2008 to Sep 2013 [actual split]; Total Need
Existing Permissions [as at 30 September 2013]; Minus 18 month target delivery of 450 per annum; Plus Windfall @ 100 per annum [historic split]; Permissions contributing to District Target
Total Need; Minus brought forward Permissions; Allocations Required.
The table also includes a section on delivery for years 0 - 5, 6 - 10, and 11 - 15.
The windfall allowance has been increased to 100/yr on the advice of the Planning Inspectorate, as windfall for the last five years averages 186 per annum. Windfalls are closely monitored in the 6 monthly housing land availability, and in the AMR. A housing topic paper will be produced for the Examination in Public which will show historic windfall completions. Policy 19 amended to state that if windfalls tail off, we will bring more allocations forward.
Carlisle South has stand alone Policy (S3).

Proposed Change
Housing target amended to 665/year.
Backlog included in table with Policy 19.
Delivery of housing earlier in the Plan period.

0492 Comment Policy S 2 31

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. We support the inclusion of heritage within this policy.
The Spatial Strategy promotes the "maintaining and enhancing the importance of environmental, historic and landscape assets". This criterion would benefit from a textual amendment in line with the NPPF.
Suggest: Amend criterion 6 to read "conserving and enhancing the significance of environmental, historic and landscape assets".

Response Agree to amend in line with comments received.

Proposed Change Amend criterion 6 to read "conserving and enhancing the significance of environmental, historic and landscape assets".

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Consultee Ref No	Consultees.Contact	Organisation	Agent	
0907	Comment	Policy S 2	31	
189	Mrs Janet Whitworth	University of Cumbria		
Detail	<p>We welcome reference to the University in Policy S2 – Spatial Strategy. We would like to see the reference expanded (separate bullet point?) – at present it is combined into a single bullet point for 'educational achievement'. The University has the power to attract undergraduate and postgraduate students to the city (thereby providing a skilled workforce to support inward investment opportunities), as well as provide CPD and higher level skills development to employees, stimulate enterprise, and provide knowledge transfer and innovation support to local businesses, as well as drive widening participation to encourage young people locally to progress through the educational system to achieve higher levels of achievement (either through the University or through other routes). Reference to the broader socio-economic impact of having a University in the city throughout the document and particularly in the early strategic objectives would strengthen and support the case for further development of the University offer and facilities.</p>			
Response	The justification to policy S2 will be strengthened to include reference to the broader socio-economic impact of the University.			
Proposed Change	<p>Include and additional paragraph to read: 3.13 The university plays an important role in the future of Carlisle as it provides a link between educational and employment. The University can attract people to the City and provide a skilled workforce to support inward investment opportunities The Plan encourages the University to develop and grow; thereby contributing to the local economy in the Carlisle District and regionally across Cumbria so that Carlisle becomes recognised as a 'University City'.</p>			
0605	Objection	Policy S 2	31	
128	Cllr John Mallinson	Carlisle City Conservative Group		
Detail	<p>Bullet point 3 should be amended to include land around J42 as area(s) for employment purposes as part of the M6 corridor utilisation. This would be in line with Policy 1 which states that the Local Plan has a commitment to ensuring opportunities for maximising potential of the M6 corridor.</p>			
Response	Agree to including a reference to J42 in policy S2 bullet 3.			
Proposed Change	<p>Amend bullet 3 to read: Develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor including the area around J42, and an employment facility at the Harker Industrial Estate that requires a major electricity supply due to its proximity to Harker substation;</p>			
0889	Objection	Policy S 2	31 & 50	
187	Ken Hind	Clerk to Kingmoor Parish Council		
Detail	<p>To develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor and an employment facility at the Harker Industrial Estate that requires a major electricity supply due to its proximity to the Harker sub-station. We feel that the motorway should be used as a boundary stopping urban sprawl. This could be used in all areas of the city – inside the motorway is urban, outside is rural.</p>			
Response	Comments noted			
Proposed Change	No change to Plan as a result of this objection			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0493	Objection	Policy S 2	3.13	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>Request: 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>			
Response	<p>The Plan does reflect the historic environment in Carlisle but agree that the section in the spatial portrait could be strengthened to give it greater weight. The inclusion of a full breakdown of heritage assets in the Plan would only give the picture at a certain point in time therefore it is considered to be more appropriate to have a dedicated section on the Council's website to provide this detail (which is already available but not within one dedicated place) which would be easily updated as and when changes occur to ensure that the information is always up to date, this would sit alongside the local plan.</p>			
Proposed Change	<p>Amend text to expand spatial portrait to read:</p> <p>In addition to these there are approximately another 1139 Listed Buildings and 19 Conservation Areas including areas within the City, the historic market towns of Brampton and Longtown and Dalston as well as some of the smaller villages. The District's Heritage is an extremely important asset, which contributes significantly to the character and attractiveness of the area and is a major draw for tourism.</p> <p>2.9 Carlisle District also has a number of locally listed buildings and structures of architectural and historic significance, these are important in creating the locally distinctive character that can be seen in parts of the District. This List will be added to ensure Carlisle's local history continues to be protected alongside both the nationally and internationally recognised assets.</p>			
0113	Objection	Policy S 3		
051		Story Homes Ltd		A010
Detail	<p>In particular, point 10 and use of locally sourced materials. This may be appropriate for development of affected buildings or Conservation Areas but should not be generally applied. There is no understood definition of local. Modern building methods and standards can require various materials and in some instances using pre-constructed panels in order to achieve Building Reg requirements. The NPPF para 60 states "Planning policies and decisions should not attempt to impose architectural styles or articulate tastes, they should not stifle innovation, originality or initiative."</p>			
Response	<p>A number of responses have been received in relation to criterion 10 of this policy. It is agreed that reference to 'locally sourced traditional materials' may be too strongly worded and not appropriate to be applied to all developments. It is therefore considered that references to locally sourced and traditional should be removed from the policy, this will make it more applicable to all types of development and allow for more flexibility and innovation whilst still meeting the guidance in the NPPF which states that 'Planning policies and decisions should aim to ensure that developments: respond to local character and history, and reflect the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation;' and para 59. ...design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.' para 60 recognises that whilst policies should not stifle innovation, originality or initiative they should still seek to promote or reinforce local distinctiveness.</p>			
Proposed Change	<p>Amend criterion 10 to read: 'seek to utilise materials which help to retain and enhance the local character of existing and new buildings and their environments. The reinstatement of existing traditional materials will be sought following repairs to roads, pavements, kerbs and underground services.'</p>			

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0146 Support Policy **S3**

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 S3 in principle 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.

Response Support noted.

Proposed Change No change required to policy as a result of this objection.

0799 Support Policy **S3**

158/33 Mrs Julie Templeton

Detail I generally support this policy. I agree with the principle of no adverse effects on the residential amenity of existing areas. I believe that the local character of Rickergate contributes to Carlisle heritage and together with historic street patterns should be taken into account in the design of any development plans. I believe that usages for existing buildings should be prioritised where ever possible over new build.

Response Support noted. Link to representation 0352 additional wording in respect of historic street patterns will be included in criterion 1.

Proposed Change Link to 0352
Include historic street patterns within criterion 1 to read:
1. respond to the local context, historic street patterns and the form of surrounding buildings in relation to height, scale, massing, and by making use of appropriate materials and detailing.

0192 Support Policy **S3**

070 Mr R Coad A013

Detail As it is considered to be in accordance with Core Principle 7 of the NPPF, we support Policy S3, in principle. 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.

Response Support noted

Proposed Change No change as a result of this response

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

0322 Support Policy **S3**

081 HS Cartmell A013

Detail As it is considered to be in accordance with Core Principle 7 of the NPPF, we support Policy S3, in principle. Good design is essential to ensure that development complements and enhances the existing environment whilst utilising suitable sites to help address development needs and demands.

Response Support noted.

Proposed Change No change to policy as a result of this representation.

0930 Comment Policy **S3**

005 Paul Barton Clerk to Dalston Parish Council

Detail All future refuse facilities should be centrally situated and preferably underground.

Response Criterion 9 relates to small scale refuse storage facilities such as residential communal bin stores and not large scale refuse facilities. The siting of such facilities will be considered as part of an overall scheme and situated appropriately to allow easy access for all users.

Proposed Change No change to policy required as a result of this objection.

0852 Comment Policy **S3**

173 Cllr Bloxham

Detail should I feel have a reference to lifelong living.

Response Lifelong living would be more appropriate within the special needs housing policy.

Proposed Change No change to policy S3 required.

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

0302 Support Policy **S 3**

078 Mr Trevor Wilson

Detail We support this policy as stated.

Response Support noted.

Proposed Change No change to policy required as a result of this representation.

0352 Comment Policy **S 3**

088 Elizabeth Allnutt Save Our Streets

Detail Rickergate has a distinct local character which contributes to the heritage of Carlisle. Design of any development in the neighbourhood must ensure that this is retained and enhanced.
 The historic street pattern is also part of the distinctive character of any neighbourhood and its retention should also figure in the design principle.
 The significance and contribution of historic buildings to the distinctive character of any area needs to be recognised in design principles.
 No reference is made to the importance of Conservation Areas
 The principle of no adverse effect on the residential amenity of existing areas is particularly relevant for Rickergate where commercial and residential concerns are in close proximity.
 Changes suggested:
 2. Should include the historic street pattern per se.

There should be a further principle inserted between existing 2. and 3.

- Special attention needs to be given to design of new developments in Conservation Areas, retaining and enhancing the setting of existing buildings of historical and local interest.

Response The existing policy contains a range of criteria. Criterion 1 takes into account the local context and form of surrounding buildings in relation to height, scale, massing and by making use of appropriate materials- the inclusion of a reference to historic street patterns would be appropriate alongside.

Conservation areas are covered within their own policy therefore it is not necessary to duplicate the references within this overarching design policy. Paragraph 3.17 highlights conservation areas in the content of the use of surface materials, but the detail is left to the specific policy, which would be used alongside the design policy in making decisions on proposals within design considerations within conservation areas.

Proposed Change Include historic street patterns within criterion 1 to read:

1. respond to the local context, historic street patterns and the form of surrounding buildings in relation to height, scale, massing, and by making use of appropriate materials and detailing.

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0578 Comment Policy S3

124 Ediston Properties/Whitbread Grou A020

Detail Although the need for new development to be of a high quality of design is seen as a generally desirable objective it can seriously impact on the viability of individual developments. Accordingly, whilst seeking a good standard of design is an objective the representation generally supports, there will be instances where design expectations need to be balanced against the need to ensure that development viability is not prejudiced resulting in key sites not being promoted for new development or for the implementation of granted schemes to be delayed or postponed indefinitely. To reflect this point it is suggested that an additional point be added to the draft policy as follows:
 '11. In seeking to ensure a high quality of design and use of locally sourced and quality materials the Council will have regard to the impact of this policy on development viability.'

Response Officers view is that reference to 'locally sourced traditional materials' may be too strongly worded and not appropriate to be applied to all developments. It is therefore considered that references to locally sourced and traditional should be removed from the policy, this will make it more applicable to all types of development and allow for more flexibility and innovation whilst still meeting the guidance in the NPPF which states that 'Planning policies and decisions should aim to ensure that developments: respond to local character and history, and reflect the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation;' and para 59. ..design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.' para 60 recognises that whilst policies should not stifle innovation, originality or initiative they should still seek to promote or reinforce local distinctiveness. This proposed change to the policy should allow for more flexibility and go some way to address the concerns raised by removing reference to locally sourced materials. A viability assessment of the whole local plan is underway and the design criteria within this policy is included as part of this work - should this show there to be an issue in respect of viability the wording will be revisited.

Proposed Change Amend criterion 10 to read: 'seek to utilise materials which help to retain and enhance the local character of existing and new buildings and their environments. The reinstatement of existing traditional materials will be sought following repairs to roads, pavements, kerbs and underground services.' It is not considered necessary to include an additional criterion making reference to viability, but this will be relooked at once the viability assessment is complete.

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1104 Objection Policy **S 3**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail Although paragraph 8, of the policy, requires that proposals should respond to the local context and the use of appropriate materials and detailing and; reinforce local architectural features to promote and respect local character and distinctiveness; no specific mention is made of reflecting Cumbrian vernacular architecture i.e. the local architecture, especially the architectural style. Whether, or not, a particular proposal responds to local context and materials may be arguable, whereas its closeness to vernacular design is quantifiable through comparison.
 Whilst a proposal may use materials resembling local brick or sandstone under a slate roof and incorporate generically similar windows and doors etc., its final form may bear no resemblance to local traditional architecture.
 A specific reference to vernacular aspects of design would, therefore, be particularly useful in ensuring that proposals, especially those in some rural and conservation areas, remain harmonised with their context.

Response Whilst the policy does not specify Cumbrian vernacular architecture, the policy is worded in such a way to ensure that new schemes respond appropriately to their surroundings and take on design elements and the use of materials which reinforce local distinctiveness. The policy is not intended to stifle innovation and the use of modern building methods nor should it result the in creation of a pastiche, therefore by stating that proposals should reinforce local arctitectural features and materials which reinforce local distinctiveness rather than prescribing the design the policy is more appropriate. The NPPF states that deisng policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. Planning policies should not attempt to impose architectural styles or particular tastes and should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain develoment types or styles. It is however propoer to seek to promote or reinforce local distinctiveness.

Proposed Change No change proposed as a result of this objection.

0986 Objection Policy **S 3**

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
 Criteria 4 of the policy should be amended to state the following: "ensure all components of the proposal, such as buildings, car parking, access routes, open space and landscaping are safe and well related to one another to ensure a well-integrated, successful and attractive development;"
 The second sentence of Criteria 10 to this policy should be deleted.

Response Agree with the first comment in respect of ensuring that layouts/schemes should be safe for users and additional wording can be added to cover this point. In respect of the second comment in respect of reinstatement of traditional materials - whilst I understand that it is up to the Local Highway Authority to determine the most appropriate materials it would still seem appropriate to include a reference to seek the reinstatement of such materials as it changes can have a significant impact on the appearance/character of an area (particularly within conservation areas) and therefore feel that this should be retained but emphasise that this will be sought in consultation with the Local Highway Authority. In addition Manual for Streets recognises that the choice of surfacing materials has a large part to play in achieving sense of place.

Proposed Change Amend criterion 4 to include 'safe' within text.
 Amend criterion 10 and para 3.10 to state 'in consultation with the Local Highway Authority'.

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

0451	Support	Policy S3		
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District supports Policy S3 - Design as it acknowledges the importance of incorporating natural environmental features into good design as well as the importance of taking the landscape setting of any proposed development into account.			
Response	Support noted.			
Proposed Change	No change to policy required as a result of this representation.			

0405	Objection	Policy S3	34	
095	Jenny Hope	United Utilities		
Detail	United Utilities requests additional text within the above-mentioned Policy: - Proposals should, where appropriate, seek to include permeable surfaces to reduce the potential impact of surface water run-off.			
Response	This would be more appropriate in policy 44 flood risk and development or 45 sustainable drainage systems.			
Proposed Change	No change proposed to this policy as a result of the comment.			

0494	Objection	Policy S3	34	
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 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. Suggestion: 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.			
Response	The policy recognises the importance of local character in the criteria set out but does not, as the consultee states, set out the local character and distinctiveness of Carlisle District. It is considered that this is covered, but not in much detail, within the local character and distinctiveness section of the spatial portrait included at the start of the Plan. It is considered that the section could be expanded to more fully define local character for Carlisle District.			
Proposed Change	Add in text to spatial portrait paragraph 2.4 onwards to highlight distinct characteristics of the District to read: *****			

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Consultee Ref No	Consultees.Contact	Organisation	Agent	
0060	Objection	Policy	S 4	
033	Matthew Good	Home Builders Federation		
Detail	<p>The policies as written are unsound as they are not justified by the evidence or consistent with national policy. The policies do not adequately demonstrate how contributions will be sought, are not supported by an appropriate assessment of their impact or based upon an up to date assessment of need for green infrastructure and open space.</p> <p>It is noted that the policies identify that appropriate and viable conditions, legal agreements and developer contributions will be used to secure new and integrated provision of green and blue infrastructure on, or associated with, new development. The policy further states 'Wherever possible new development will be expected, either on site or through contributions to assets elsewhere'.</p> <p>It is noted that CCC is currently considering the implementation of CIL. If CIL is adopted this should be the only tool for collecting funds to address the cumulative impacts of development on types of infrastructure. Therefore the policy would need to explicitly explain any funds received through section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development. They should not seek to rectify existing deficits or wider strategic infrastructure issues. The Council will be aware that the current CIL regulations limit the use of pooled planning obligations collected through section 106 procedures to five from April 2014 or local adoption of CIL, whichever is sooner. It does, however, appear likely that the April 2014 date will be pushed back at least one year.</p> <p>The policies also infer that contributions for new green infrastructure and open space will be sought from all new development. This stance does not, however, take any account of the current provision of green infrastructure or open space across the district, including areas of surplus provision. Areas of surplus should be exempt from such requirements, unless it can be evidenced that the development would create a specific requirement. The requirement for new green infrastructure and open space should be founded upon a credible up to date evidence base which identifies deficits and surpluses. The Council's audit of open space is noted, however it is noted that the Council consider this work to be out of date, acknowledging in paragraph 10.34 that it needs updating. It is also important that the impending plan wide economic viability assessment considers the impact of both policies on economic viability in accordance with NPPF paragraph 173.</p> <p>Recommendation: It is recommended that the policies be amended to provide a clear steer on how contributions will be sought from developers. The policies should also recognise that in areas of surplus green infrastructure or open space, identified through an up to date evidence base, should be exempt from site specific requirements.</p>			
Response	<p>Disagree. The Local Plan should be read as a whole. Other policies, including the Delivery of Infrastructure and Planning Obligations policy detail how and when contributions from developers will be sought. Further detail is also provided in the Open Space policy regarding sports pitches and other open space. This policy outlines the strategic direction the Council wishes to take with regard to Green Infrastructure and the steps it expects developers to take to protect and enhance GI assets through the development process.</p>			
Proposed Change	<p>No change.</p>			

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

0283 Support Policy **S 4**

077 Mr Alan Hubbard National Trust

Detail The proposed policy adequately addresses the key considerations relating to green infrastructure. It is noted that the particular importance, for example for biodiversity, of ancient woodlands is not specifically referred to in this policy or the supporting text; this is something that the Trust believes merits some further consideration although it has noted the reference to this in Policy 64.

Give consideration to a specific reference to ancient woodlands in Policy S 4 (e.g. Within part 3 and para 3.41).

Response Support acknowledged

Proposed Change No change

0147 Objection Policy **S 4**

062 Church Commissioners for England A013

Detail 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 S4 and its supporting text. Moreover, there is 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 the much needed development throughout the district. It is therefore suggested that further clarification on this matter should be included within the policy or its supporting text.

Response Noted. The Council already assesses each application on its own merits. Flexibility is a fundamental principle of the planning process and is reflected throughout the plan, including within Policy S4.

The Local Green Space element already, as per the guidance in the NPPF, highlights that any such designation could not be made solely for the purpose of blocking development.

Proposed Change No change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0418	Comment	Policy	S 4	
097	Amy Heys	Environment Agency		
Detail	<p>We wish to strongly support policy S4 but would welcome the opportunity to work with you to make it more ambitious and targeted. We consider it is important for you to present a spatial vision for green infrastructure protection and improvement in line with paragraph 114 in the NPPF. We feel that by doing this you could create a policy that delivers better results for the city and district. Suggested changes that we would like you to make are as follows:</p> <ul style="list-style-type: none"> - Produce a map which shows which existing Green Infrastructure you want to protect and enhance and which areas you want to see new green infrastructure in. <p>Within your justification you reference rivers that could be opened up (3.39) and areas with particular deficit of high quality green space (3.38). Both of these could be represented on the suggested map. We have identified priority weirs to remove (four sites on Cam Beck on the River Eden; Cam Beck Weir, Solmain pipe bridge, Walton Mill weir and the A6071 site) which are believed to be an obstruction to fish and driving the failure of WFD objectives. We have also identified priority culverts to open up, a high priority from a flood risk reduction perspective is a narrow culvert in Beck Lane, Brampton.</p> <p>By mapping your objectives you will make your policy more targeted and more likely to deliver the cumulative benefits of enhancing and protecting Green Infrastructure in particular locations.</p> <p>In recommendation 55 from The Big Green Infrastructure Strategy for Carlisle reference is made to a GIS Green Infrastructure Model. Is possible to use this to create a mapped vision for Green Infrastructure?</p> <p>We support the work that you are doing with the Eden Rivers Trust to improve Green Infrastructure within Carlisle as it is one way in which you can contribute to improved water quality and work with us and other partners towards achieving the aims of the Water Framework Directive.</p> <p>Within the Carlisle Area there are 47 water bodies comprising rivers, lakes and groundwater. Under Water Framework (WFD) requirements a wide range of criteria are assessed and used to determine the ecological status of each water body. In order to meet WFD objectives water bodies must achieve good chemical and ecological status in inland and coastal waters by 2015.</p> <p>For Carlisle District the classifications are:-</p> <ul style="list-style-type: none"> Good Ecological Status - 20 Moderate Ecological Status - 16 Poor Ecological Status - 10 Bad Ecological Status – 1 <p>This information is available from our River Basin Management Plans and could be used to help you construct a Green Infrastructure vision.</p>			
Response	<p>Support acknowledged. The Council is keen to work with the Environment Agency to refine and enhance Policy S4 as the Local Plan moves towards publication. Work is ongoing to incorporate the suggestions put forward in this response. More work is required to produce a comprehensive map of GI assets and a strategy for improving and protecting them.</p>			
Proposed Change	<p>Continue to work with EA to improve policy S4 as suggested. Work towards a strategic GI map for publication stage of the Local Plan.</p>			

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

0931 Comment Policy **S 4**

005 Paul Barton Clerk to Dalston Parish Council

Detail Mostly good.

Response Support acknowledged

Proposed Change N/A

0193 Objection Policy **S 4**

070 Mr R Coad A013

Detail 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 S4 and its supporting text. Moreover, there is concern regarding the 'Local Green Space' element of the policy. The policy currently states that local communities will have the opportunity to designate high valued areas as 'Local Green Space'. The Council needs to ensure that this does not become a way for local residents to obstruct the much needed development taking place throughout the district. It is therefore suggested that further clarification on this matter should be included within the policy and its supporting text before it can be found sound.

Response Noted. The plan is clear throughout that contributions from developers for required infrastructure must not be excessive to the point of risking the viability of a development.

The policy also states that Local Green Space cannot be used as a means to block development. Where this is suspected the designation will not be implemented.

Proposed Change No change.

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

0114 Objection Policy **S 4**

051 Story Homes Ltd A010

Detail There is no indication of what land will be required for different sizes of development. Policy S4 states "wherever possible new development will be expected, either on site of through contributions to asset elsewhere". Development contributions should mitigate their own impacts only in order to make the development acceptable in planning terms and be fairly and reasonably related in scale. It is not appropriate for developments to address existing deficiencies or wider issues. It is important to provide developers with as much certainty as possible in relation to developments in order to promote viability. (same rep as 0115)

Response Disagree - where an existing infrastructure deficit exists that would impact upon the well being and day to day life of the residents/business that will subsequently occupy the development then it is entirely appropriate for developer contributions to address this. A viability assessment is underway to assess the economic impacts of policies in this plan and will be used to ensure that developer contribution requirements do not make developments unviable as well as ensuring that viability can not be used as a tool for developers to shirk their responsibility to the communities they wish to develop in.

Proposed Change No change

0177 Support Policy **S 4**

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail Care of and respect for creation is a God-given duty and privilege. Chapter both welcomes and supports Policy S4 (p.37-40) and the expectations placed upon developers of new properties, though notes that the Policy is not specific about whether it should be applied to all new development, commercial and domestic. We further welcome the protection of bio- and geodiversity, green and blue infrastructure and the securing of reasonable access to it.

Response Acknowledged

Proposed Change No change

1121 Comment Policy **S 4**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail There needs to be a structured plan for cycle ways into, around and through the City, to encourage safer cycling.

Response Noted. Should cycling way proposals come forward they will be supported through this policy.

Proposed Change No change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0800	Support	Policy	S 4	
158/33	Mrs Julie Templeton			
Detail	I generally agree with this policy. I would like more protection given to green banks and green places within communities. I would like to see wildflower meadows incorporated into parks, verges and open spaces, as well as helping to stop the decline of the bee population, after the initial outlay, savings could be made by cutting the cost of maintenance.			
Response	Support acknowledged. Wildflower meadows will be included within the policy.			
Proposed Change	Include wildflower meadows as requested.			
0452	Support	Policy	S 4	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District strongly supports Policy S4 – Green Infrastructure. The policy will result in better and more sustainably designed developments which will incorporate and enhance the natural environment and provide sustainable cycle and pedestrian access to new developments. We welcome the inclusion of this policy particularly the section on Local Green Space.			
Response	Support acknowledged.			
Proposed Change	No change.			
0323	Objection	Policy	S 4	
081		HS Cartmell		A013
Detail	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 S4 and its supporting text. Moreover, there is concern regarding the 'Local Green Space' element of the policy. The policy currently states that local communities will have the opportunity to designate high valued areas as 'Local Green Space'. The Council needs to ensure that this does not become a way for local residents to obstruct the much needed development taking place throughout the district. It is therefore suggested that further clarification on this matter should be included within the policy and its supporting text before it can be found sound.			
Response	Noted. The Plan should be read as a whole, issues regarding viability and the use of developer contributions are addressed within Policies on Delivering Infrastructure and Planning Obligations.			
Proposed Change	Local Green Space is a designation presented within the NPPF. The policy is clear that they cannot be instated purely to block development. If this is suspected, the designation will not be approved. No change.			

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

0987 Comment Policy **S 4**

194 Michael Barry Cumbria County Council

Detail This policy is broadly welcomed however reference to the Cumbria Transport Authority requires amendment.
Suggested Changes:
In point 2 of this policy; "Cumbria Transport Authority" should be amended to "Local Highway Authority".

Response Noted.

Proposed Change Amend as requested.

0678 Objection Policy **S 4**

146/18 Mr Ian Brodie The Ramblers

Detail The Policy recognises the important of Hadrian's Wall WHS as part of the green infrastructure but fails to give recognition of the English Coastal Route, the delivery of which is Government Policy. The future development of this trail through Carlisle LP area (as with the existing Pennine Way and Cumbria Coastal Way) is an important part of the areas green infrastructure and appropriate protection of the potential route should be made. Any developments which infringe on the route should be examined for potential planning gain which may facilitate the route.
Add the route of the proposed English Coastal Route will be given appropriate protection.

Response The policy does not reference the Hadrian's Wall WHS. The English Coastal Route is mentioned elsewhere in the plan.

Proposed Change No change.

0410 Comment Policy **S 4**

096 Rob Naples Northumberland County Council

Detail The policy appears to provide protection to existing green infrastructure and seeks to ensure that adequate green infrastructure is provided through new developments. However, the policy does not take account of any cross-border green infrastructure linkages. Northumberland County Council is currently preparing its Core Strategy, which looks to protect and enhance Northumberland's green infrastructure network, including links with the green infrastructure networks in adjoining authority areas. A number of trails and national routes as well as the Hadrian's Wall World Heritage Site cross Northumberland's border into Carlisle and the County Council would suggest a reference within the Local Plan to the possibilities of cross-boundary working to protect and enhance such green infrastructure assets

Response Agreed. Cross-boundary issues will be referred to in the policy.

Proposed Change Include reference to cross-boundary issues.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0376	Objection	Policy	S 4	
089	Elizabeth Allnutt	National Allotments Society		
Detail	Local Green Space - Allotments as highly valued areas should be designated 3.40 Allotments are productive landscapes and should be protected from inappropriate development Suggest: 3.40 - Include allotments along with forestry, agriculture etc.			
Response	Disagree - whilst it is accepted that allotments are productive land uses, and their importance as this is valued, this part of the policy is referring more to large scale uses. Allotments would look out of place when included with a large scale forestry and agriculture. It is also debateable as to whether it could be suggested that allotment use "powers" the rural economy. Allotments are also protected to a greater degree and with much more detail within the plan elsewhere.			
Proposed Change	No change.			
1105	Objection	Policy	S 4	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	The emphasis on the protection and enhancement of existing green assets is welcomed especially that afforded to local green space- once designated. However; it would be appropriate to also include specific reference to the protection and enhancement of other non statutory green assets. In particular, the requirement for proposals to protect and enhance key ecological habitats and wildlife corridors (paragraph 3) may protect the integrity of sites hitherto vulnerable to significant damage, despite their importance to the integrity of local biodiversity. With regard to developer's compensatory contributions, or mitigation measures, in respect of proposals; it would be desirable for these to be deployed as closely as possible to the affected green asset; a reference to such a requirement should be clearly stated within the policy.			
Response	Noted. Ecological habitats and wildlife corridors are protected under this policy and under the Biodiversity and Geodiversity policy. Reference will be made to ensuring mitigation measures are deployed as closely as possible to affected green asset.			
Proposed Change	Reference ensuring mitigation measures are deployed as closely as possible to affected green asset to be included in policy.			
0353	Support	Policy	S 4	
088	Elizabeth Allnutt	Save Our Streets		
Detail	Green Infrastructure is particularly relevant to inner-city areas where there can often be little or no green space for visitors and more importantly residents. Rickergate has a large residential element which needs to be considered. Local Green Space – the green banks at the west end of Corporation Road are significant for local residents and should be regarded as important for residents and the neighbourhood as a whole, as well as their general amenity value for city centre users and visitors.			
Response	Support acknowledged. The suggested Local Green Space shall be considered for designation as Local Green Space.			
Proposed Change	No change.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0304	Objection	Policy S 4	37	
078	Mr Trevor Wilson			
Detail	<p>This policy replaces LCg – disused railway lines. The previous LCg had a definitive statement with respect to protecting the Carlisle Goods Avoiding Line. 'In the urban area they may also provide a safer alternative to roads for pedestrians and cyclists. Larger areas of disused railway land, such as goods yards or maintenance depots can also provide ideal opportunities for development, thus reducing the need for greenfield sites. These sites are therefore excluded from this policy. The reinstatement of the former railway line known as the Carlisle Freight Avoiding Line has the potential, if implemented, to release passenger capacity on the West Coast Main Line by reducing the constraint of the passage of freight goods through the congested Citadel Station. There are, however, potential conflicts between a number of uses in the vicinity of the route including its use as part of the Sustrans national cycle route. These conflicting uses need to be resolved through additional work within the plan period before confirming the most appropriate use for this former railway line'</p> <p>The Carlisle Goods Avoiding Line is not mentioned in the new Local Plan.</p> <p>Include a statement protecting the Carlisle Goods Avoiding Line, as per previous plan.</p>			
Response	Noted. Reference to this will be included in the policy.			
Proposed Change	Include reference to disused railway lines, and the Carlisle Goods Avoidance line within policy justification.			
0104	Objection	Policy S 4	38	
049	Mr D Nash			
Detail	The phrase "exceptional Overriding Need" requires defining otherwise developers will decide their definition for Carlisle.			
Response	Noted. Wording will be changed. The Council will use its judgement for each case on its own merit as to what constitutes overriding economic and/or social need.			
Proposed Change	Wording to read: "overriding economic and/or social need"			
1106	Objection	Policy S 5		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	The area encompassed by this policy includes the Citadel Station yet no mention is made of this vital economic asset, or any form of linkage between it and the local public transport network. Reference should be made to options for the provision of an integrated transport hub in this vicinity- perhaps by elevating the existing car park to first floor level in order to allow the creation of a ground level bus station.			
Response	The work on the City Centre Masterplan will help inform future policies on the Local Plan. Comments will be fed into the work on the City Centre Masterplan.			
Proposed Change	No change to policy in response to this comment.			

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

0801 Comment Policy **S 5**

158/33 Mrs Julie Templeton

Detail In view of the high profile of Rickergate in previous development plans put forward in the Local Plan I find it very suspicious that the public are being asked if they support policy S5 when the City Centre Masterplan has not been made available to the public. Thoughts on the future of the high street are changing all the time. There is no consensus on what the impact of Internet shopping is going to have on the high street in the future and I think that development plans should reflect this. I agree that the historic character of the City Centre should be retained and a mix of units for all retailers. I believe that the city centre belongs to all of the people and the city centre should be kept as a public place retaining public rights of way. I think that public rights of way within the city should be protected on behalf of the public and not allowed to become a private public space handing private control to local private business partnerships. I think that if a large Primark store moved into the city centre it would have an adverse affect on all the other value clothing stores in the centre such as H&M and TK Max. Primark has a lot of support and people are prepared to travel to shop there, it is one of the stores that would do well at an out of town site as the people who support it would not be put off by the travelling. I agree with a mix of uses in Botchergate and the city centre other than just bars, fast food outlets and shops. There are no details given on parking plans for the city centre. I agree with the importance of public real improvements within the city, maintenance and cleanliness outweigh statement items.

Response The work on the City Centre Masterplan will help inform future policies on the Local Plan. Comments will be fed into the work on the City Centre Masterplan.
Proposed Change No change to policy in response to this comment.

0685 Support Policy **S 5**

147/19 Mr Viv Dodd

Detail Yes

Response Support noted
Proposed Change No change required

0435 Support Policy **S 5**

098 Sainsbury's Supermarkets Ltd A015

Detail Sainsbury's supports Policy S5 and the Council's aim to focus retail and other main town centre use development within Carlisle City Centre. This approach reflects the settlement hierarchy and the strategic role that the City Centre plays within the borough and the wider Cumbria I Borders area.

Response Support noted
Proposed Change No change required

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

0988 Objection Policy **S 5**

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
There should be policies dealing with land use and development sites within the City Centre. The selection of sites should have regard to infrastructure availability and site deliverability.

Response The work on the City Centre Masterplan will help inform future policies on the Local Plan. Comments will be fed into the work on the City Centre Masterplan.

Proposed Change No change to policy in response to this comment.

0194 Comment Policy **S 5**

070 Mr R Coad A013

Detail 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. To ensure that deliverable sites are allocated for development, the Council should not over rely on brownfield sites, particularly in the short term. Brownfield sites will take time to be delivered and completed. On this basis, adequate greenfield sites (throughout the District, not just in Carlisle) must be allocated to ensure the development need and demand for the entire District is met, particularly housing development.

Response The Council have commissioned a viability study that will inform the Local Plan. The City Centre Masterplan is also being completed and the Masterplan work will test viability as part of its findings. The Council have considered green field and brown field sites during the preparation of the Local Plan and many sites selected are green field sites.

Proposed Change No change to policy in response to this comment.

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

0178 Objection Policy **S 5**

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail
 Chapter welcomes the ambition to develop the Botchergate area but it unclear about the Council's exact ambitions for the unspecified area between the pedestrianized centre and the station. It notes in 3.46 and 3.47 the expectation that population increase will generate extra demand from the city centre offer, but wonders whether the (perhaps) unambitious new-build housing targets will provide sufficient residents with disposable incomes to generate interest from nationally recognised high-quality retailers present in other larger cities.
 If the City Council is to fulfil its aim to promote Carlisle as the retail and heritage capital of Cumbria and The Borders, regular, seasonal and special occasion trade bleed from the south of the county to Preston and Lancaster, and from the north of the county to Newcastle (and perhaps also Glasgow and Edinburgh) must be addressed to ensure that the quality of the retail offer is compelling. This would ensure that footfall in heritage attractions and income from their associated retail does not also decline. We long for sustainable and appropriate use of the Hoopers' building opposite the north side of the Cathedral, as its continuing emptiness casts a shadow over the vibrancy of the Historic Quarter.

Response
 The Carlisle Retail Study August 2012 considered Carlisle's potential in terms of retail expansion and the loss of trade to other areas and identified the level of growth and scale of development required to attract retailers particularly those represented nationally. This work is being taken forward in a City Centre Masterplan elements of which have fed into the Preferred Options Stage 2 Plan, this will continue to be developed.

Proposed Change
 No change required as a result of this objection.

0324 Comment Policy **S 5**

081 HS Cartmell A013

Detail
 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 greenfield sites need to be identified to ensure that the Plan is realistic and the sites are truly deliverable.
 To ensure that deliverable sites are allocated for development, the Council should not over rely on brownfield sites, particularly in the short term. Brownfield sites will take time to be delivered and completed. On this basis, adequate greenfield sites (throughout the District, not just in Carlisle) must be allocated to ensure the development need and demand for the entire District is met, particularly housing development.

Response
 City Centres sites on previously developed land have been identified for potential development in the stage 2 preferred options Local Plan, the deliverability of these sites is being considered as part of the City Centre masterplan work, this will therefore identify any potential viability issues. Both brownfield and greenfield sites have been put forward as proposed allocations for residential development, therefore it is not considered that the Plan is overly reliant on brownfield sites. Additionally whole Plan viability work has been undertaken to evidence the policies and allocations contained within the Plan.

Proposed Change
 No change required to the policy as a result of this comment.

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

0354 Comment Policy **S 5**

088 Elizabeth Allnutt Save Our Streets

Detail

Policies for the City Centre are particularly relevant for residents and business people in Rickergate and the absence of detailed policy for the City Centre is a serious omission. It is impossible for SOS and indeed anyone else, to comment meaningfully on this policy without the City Centre Master Plan in place. The validity of the Local Plan will be in doubt when consultation comments are returned without respondents being able to consider the City Centre Master Plan, both for the City Centre itself and how the policies surrounding this relate to other district wide policies.

In principle this policy contributes to the support of the City Centre as the major centre for retail in the City. However it also misses the other functions of the City Centre:

- Other services – e.g. Council offices (City and County), library, swimming pool etc. What is the policy surrounding central locations for these other services?
- There is a significant residential element there which is an important contributory factor to the life of the centre which is not considered? What are the principles for supporting or extending or indeed reducing this element beyond using the upper floors?
- Parking. Easy and cheap access for shopper parking is essential for retail. What are the policies for this in the City Centre? What is the relationship between shopper parking and residential parking?
- Public transport – access to this and its location in relation to the shops and other services?
- The social aspect of the City Centre as belonging to all the citizens of Carlisle; a place for public demonstrations and celebrations for all aspects of Carlisle life – e.g. Christmas lights, Love Parks Week as well as a location for raising and drawing attention to local political or social issues. What are the policies for encouraging this? An emphasis on retail and the needs of retail may discourage and stifle these events which are of great importance to the life of the City Centre
- Visitor attraction, particularly the heritage aspects. Other Conservation Areas other than the Portland Sq area should be listed and therefore given the attention they need.
- The role development can play in supporting small local businesses as well as large national chains

All of these aspects need to be considered as functions of the City Centre beyond the purely commercial and retail concerns.

The significance of the City Centre is of importance to all aspects of future planning in Carlisle District. The absence of any detailed policy for the City Centre is a glaring omission and means that any comments made on Policy S5 without this in place should be deemed invalid.

The Infrastructure Delivery Plan which will deal with transport links will also have a strong bearing on the future of the City Centre and should also be complete before any comments on this Policy can be valid

Require the publication of the City Centre Master Plan and the completion and publication of the Infrastructure Delivery Plan so that there is clarity about policy for the City Centre. This is only the beginning – objections cannot be resolved until it is clear what might be wrong.

In principle the emphasis on the City Centre as only a retail centre needs to be redressed.

Response Comments noted. The preferred options stage 2 consultation will provide more detail in respect of policy S5 alongside the publication of the masterplan.

Proposed Change No change at present, following the next preferred options consultation which will incorporate more policy detail

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0552	Support	Policy S 5		
120		Possfund Custodian Trustees Limit	A019	
Detail	<p>We note the 'consultation so far/what you told us' comments that 'respondents felt that large operators are important and that further development in the City Centre should be allowed to attract them to Carlisle.</p> <p>We also agree with the comments that a policy to encourage development activity in the Botchergate area would be beneficial. The forthcoming improvements at St. Nicholas Gate Retail Park will enhance the appearance of the wider Botchergate area and make the route into the City more attractive. This may stimulate further investment in the Botchergate/London Road corridor. Given it is an existing retail destination with strong linkages to Botchergate, reference could be made to St. Nicholas Gate Retail Park in draft Policy S5, which supports proposals which focus on the consolidation and improvement of retail uses within the area.</p> <p>Re the justification text paragraphs 3.47 and 3.48: The existing and consented retail floorspace at St Nicholas Gate Retail Park provides suitable opportunity for the Council to meet future retail needs within the City Centre by offering sites to potential new retailers which require larger floorplates. Through the development of the City Centre Masterplan and other local policy framework documents the Council can improve the retail offer of the City Centre and in doing so improving it's vitality and viability.</p>			
Response	Support noted			
Proposed Change	No change required			

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

0207 Comment Policy **S 5**

071 Andrew Hunton Cumbria Constabulary Community

Detail [also see rep 0208 Policy 10] The Council’s desire to encourage vibrancy and sustainability in this sector is acknowledged. However, there are implications to Cumbria Constabulary in policing the Night-time Economy. The Constabulary maintains minimum staffing (constables) levels throughout each 24 hour period. To accommodate the demands on police resources, staffing is doubled every Friday, (between 2100hrs and 0400hrs) and by a factor of 2 ½ on Saturday. The festive season places even greater demands on available resources. It can be demonstrated that the majority of alcohol-related crime and public disorder in the City, occurs in conjunction with Night-time Economy around Botchergate within these hours.

Experience in other Police Forces has shown that too many A4 and A5 premises concentrated in a small area will generate a disproportionate level of public disorder and alcohol-related crime. Ratios of Night-time Economy outlets exceeding 20%, compared to other retail outlets, have been found to produce this effect.

Therefore, the Constabulary would support a policy that encourages a broader range of commercial activity around Botchergate and consideration of a ‘Saturation Policy’ that would place a limitation on the ratio of Night-time Economy establishments. A greater diversity of Uses would contribute to vibrancy and sustainability in this area and provide additional interest and appeal to this Conservation Area.

Response Noted. An anti-saturation policy was discussed with Councillors when preparing the plan. They however felt that it would be unreasonable and beyond the remit of the plan to restrict particular use-types in this area, particularly if the market for them is still strong. There was a concern that limiting the amount of evening economy uses within Botchergate would lead to a spreading of night spots, and the less desirable implications and problems which that brings, across the city as opposed to focusing them in a more manageable, contained area could create more problems than it would solve. A more flexible approach to development may be explored through retail and city centre policies however. The Council would welcome further discussion on this issue with the Constabulary.

Proposed Change This issue should be explored in more detail with the Constabulary before changes are made to policy.

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

0148 Comment Policy **S 5**

062 Church Commissioners for England A013

Detail 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. We therefore strongly question the realistic deliverability of these suggested 'regeneration' sites, particularly where it involves housing, during the plan period and suggest that more detailed deliverability and viability work is necessary before the Council can include this site as 'deliverable' during this plan period. To ensure that deliverable sites are allocated for development, the Council should not over rely on brownfield sites, particularly in the short term. Brownfield sites will take time to be delivered and completed. On this basis, adequate greenfield sites (throughout the District, not just in Carlisle) must be allocated to ensure the development need and demand for the entire District is met, particularly housing development.

Response Viability work on the whole of the Local Plan has been recently undertaken and this will inform revisions to the Plan where necessary. Also the City Centre Masterplan will consider, in detail, the deliverability of sites in order to meet the need identified within the Retail Study. It is not considered that the Local Plan is overly reliant on brownfield sites with a mix, particularly in respect of housing sites, containing a considerable number of greenfield sites as will be seen on the Preferred Options Stage 2 policies map.

Proposed Change No change to Policy as a result of this objection.

0495 Objection Policy **S 5** 41

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. The historic environment should be considered in delivering a number of other planning objectives, 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. 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. Suggestion: 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. The Council should be undertaking conservation area appraisals to inform this part of the Plan.

Response This is being looked at as part of the City Centre masterplan which highlights the heritage assets and the Historic Quarter. Further details may be added once the masterplan is complete.

Proposed Change No change proposed at this stage.

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

0908	Comment	Policy	S 5	41
189	Mrs Janet Whitworth	University of Cumbria		
Detail	We are supportive of the regeneration and development of Botchergate, especially further measures to better integrate and dissipate the social benefits generated by this currently tightly focused activity. The proximity to the University's Fusehill Street Campus is important, as is the contribution that the facilities make to the 'student experience' in Carlisle. Pubs, bars and nightclubs have a part to play, as does access to reasonably priced takeaways, cafes and restaurants. We are also keen to see reference to the provision of appropriate levels and locations for private student accommodation and access and signage to the University campus from the City Centre, as well as advertising (and from the perimeter of the City at key access points e.g. London Road etc.). [same comment to Policy 10 page 69 - Ref 0909]			
Response	Comments noted.			
Proposed Change	No change required			

0606	Comment	Policy	S 6	
128	Cllr John Mallinson	Carlisle City Conservative Group		
Detail	Is this a sufficiently welcoming statement of intent regarding future expansion of the university?			
Response	The policy has been developed in consultation with the University, and we have a continuing commitment to work with them to ensure that the Local Plan can help to facilitate Plans for future development within Carlisle.			
Proposed Change	No change required as a result of this comment.			

0802	Support	Policy	S 6	
158/33	Mrs Julie Templeton			
Detail	I support the Universities place in the city. I would like any expansion plans for the University to be alongside and compatible with existing communities.			
Response	support noted			
Proposed Change	no change required			

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

0989 Comment Policy **S 6**

194 Michael Barry Cumbria County Council

Detail Both the Sub-Regional Spatial Strategy and the County Council's Area Plan for Carlisle support the important role of the University of Cumbria. The Local Plan should also give clearer support to the important role of the University given the educational and economic benefits higher education creates. Suggested Changes: 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".

Response Agree to demonstrate a clearer degree of support for university by amending wording to policy in line with suggestion.

Proposed Change Amend policy to read: To ensure the continuing development higher education in Carlisle, proposals will be supported providing that;...
3.75 To ensure the continued success of all higher education institutions the following range of higher education and related uses will be supported;...

0590 Comment Policy **S 6**

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail The University of Cumbria's main campus is in Carlisle but it does have a presence in Allerdale. Both Local Plans are supportive of the future plans for the University and there maybe an opportunity to work jointly in the future to deliver the University's aspirations.

Response Comments noted

Proposed Change No change required as a result of this comment.

0932 Comment Policy **S 6**

005 Paul Barton Clerk to Dalston Parish Council

Detail The university needs to provide the right courses for local people which are sustainable.

Response This is not a matter for the Local Plan

Proposed Change No change required as a result of this objection.

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

0179 Support Policy **S 6**

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail
 The University of Cumbria's use of the Cathedral for twice-yearly graduation ceremonies is important in many ways to the Cathedra. The Bishop of Carlisle is an ex-officio member of the University's Board of Management and The Dean is present by election. Chapter welcomes proposals to expand and develop the university infrastructure and the consequent opportunity to deepen and develop the Cathedral's relationship with the University. Chapter believes that the University makes a significant and positive cultural and educational contribution to the character of the City of Carlisle. Its expansion, together with the Cathedral's own Fraternity project development, will offer new and creative opportunities for the University and Cathedral to work in partnership. Increased numbers of students will positively impact demand in retail and night economies and create sustained demand for low cost let property. The expansion of the University may allow it to develop a research base, enhancing its national reputation, attracting additional postgraduate students and enabling the University to attract further high-quality academic and administrative staff. If this expansion takes place at the same time as the development of potential employment for graduates, year-on-year retention of young people and expanding University employment could contribute to lowering of the mean age of Carlisle's demographic by 2030.

Response support noted
Proposed Change no change required

1107 Objection Policy **S 6**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail
 Whilst the importance of the University of Cumbria's presence in the city is undeniable the policy itself is superfluous and constitutes repetition. The policy's provisions i.e. Proposals for expansion would be acceptable providing that: the scale reflects the surrounding area; or it results in the refurbishment of a vacant building and does not detract from the amenity and quality of the surrounding environment; and that satisfactory access can be achieved, are stated in other policies within the consultation document. In view of the difficulty in confirming the university's exact plans, following the introduction of fees, the lack of a university specific policy would not, of itself, indicate a lack of support for the institution.

Response The University is of strategic importance to Carlisle providing clear educational and economic benefits to the District. To have no specific policy for the University would be to show a lack of recognition for the importance of having such an institution within Carlisle and no strong indication of the level of support that will be given to appropriate proposals for the development and expansion of the University.
Proposed Change No change required as a result of this objection.

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

0910	Comment	Policy	S 6	43
189	Mrs Janet Whitworth	University of Cumbria		

Detail

We welcome a specific policy for 'University Development' and are fully supportive of this approach, to enable the University to develop and grow, thereby contributing to the local economy in the Carlisle District and regionally across Cumbria. We welcome recognition that the University, as part of a process of developing a sustainable and resilient business model, may require to rationalise or redevelop existing sites and facilities, and also use existing vacant sites to develop further appropriate teaching and learning spaces, business interaction facilities and/or student accommodation. To this end, the University needs the development flexibility necessary to adapt its estate to suit ever-changing education sector initiatives and challenges, acknowledging that they will need to be delivered within a transparent and appropriately consulted statutory process.

As per our response to S2 [Ref 0907] 'The University has the power to attract undergraduate and postgraduate students (both national and international) to the city, as well as provide CPD and higher level skills development to employees, stimulate enterprise, and provide knowledge transfer and innovation support to local businesses, as well as drive widening participation to encourage young people locally and regionally to progress through the educational system to achieve higher levels of achievement (either through the University or through other routes)'. The University, being Cumbria wide, has sites across the sub-region – in this respect, the University also provides a mechanism for driving connectivity with the 'Energy Coast', both in relations to skills and support for the supply chain which seeps into the Carlisle District.

We would seek reference to the broader socio-economic impact of having a University in the city, supporting the case for further development of the University facilities. The policy itself is rather bland, and reads as 'reactive', rather than facilitative in the growth of the University. For example, 'refurbishment of a vacant building' – during the lifetime of the plan we may seek to develop new builds on vacant sites, to bring our campus facilities together – we would like the plan to enable this, should this become a reality within the plan's lifetime.

Justification should refer to the Carlisle Economic Potential study, which recognises the socio-economic impact of having a University in the city.

3.49 refers to the University 'having brought together previous further education offers in the Carlisle' – please note that the University does not deliver further education, it delivers higher education, and has brought together the higher education offer in the city. It is important that this differentiation is understood and acknowledged as the mechanics and engagement with the city and business can often be different, depending on the FE or HE context.

We would like the scope of the policy to be expanded, recognising the contribution of the University to the local and regional economy, and providing scope for the University to move facilities, and to develop vacant sites, and undertake new builds, should that be appropriate to grow the Universities student numbers and/or support local business growth. This may involve consolidating campuses, and so the widest use for University buildings/sites which may include proposals for disposal is sought, provided that funds secured as a result are re-invested in the University's development. We are also keen to identify potential zones for University development across the city to support future development, should a consolidation of sites be required within the timeframe of the plan.

We would also like to reference Policy 59 (local listings) here, and the need to take an appropriate and supportive view on listings on buildings contained with the current University estate in Carlisle. The University and the Council should work collaboratively so that listings, and also restrictions on sites, are positively appraised to minimise unnecessary barriers to development.

We would also seek reference to the ability to extend the lease on Paternoster Row, and to bring Castle Street back to use, to support business interaction, depending on the success of the newly opened facility on Paternoster Row.

The University views Carlisle City Council as a critical partner, and one that can contribute to the future success and growth of the University, and therefore the University's contribution to the local economy.

We would also wish to continue our involvement in the range of discussions and proposals which focus specifically on Arts and Culture. The Arts are viewed by the University as a key mechanism for engaging with the local community and for raising aspirations. The Arts can make a key contribution to physical and mental health and well being, and to wealth generation; the development of key sites to provide a focus for Arts activities should be a principal goal for the University and the City working together, and the College.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
Response	It is not proposed to significantly amend this policy - however the wording in S2 Spatial Strategy has been strengthened to reflect the strategic importance of the university and recognise the benefits of the presence of the university particularly as its development and the wider social and economic impacts contribute towards meeting the Local Plan objectives.			
Proposed Change	No change to policy as a result of this objection.			

RepNo	Status	Paragraph	Page	Map
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Consultee Ref No	Consultees.Contact	Organisation	Agent
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REPRESENTATIONS

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

Chapter 04

0022 Objection Policy

011 Terry Jones

Detail The Plan Lacks ambition: Rather than having a plan for the redevelopment of the Willowholme industrial estate as an estate attractive to small businesses, and part of it for flood resilient housing, the City Council has decided to sell off such of its holdings as it can and to abandon those holdings that it cannot sell. There are already an number of abandoned and derelict buildings on the estate and a number of large facilities in private ownership which have been on the market for sale or lease for a number of years.

Response No change to the Plan. Whilst there may be vacancies at present the estate provides sites and buildings for businesses which may be difficult to accommodate elsewhere and it is important to ensure that the City has a range of sites to accommodate different employment uses to meet the needs of businesses wishing to start up or expand within Carlisle or relocate to Carlisle.

Proposed Change No change proposed to plan as a result of this objection.

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

0571 Objection Policy

122 Bob Taylor Taylor & Hardy

Detail
 The Local Plan follows themes from the previous Local Plans in defining areas for specific uses such as Primary Employment Areas, Mixed Commercial Areas, Primary Retail Areas and Primary Residential Areas.

Whilst the policy approach underpinning those themes may well have been successful there have been significant changes in the 30 years since that approach was conceived.

In particular the Government has recognised for some time (e.g. PPG 1 revised 1997) the benefits of a mixed use approach which can create vitality and diversity and reduce the need to travel. It advocated identifying specific sites where such an approach could be justified.

The NPPF adopts the promotion of mixed use developments as one of its core planning principles (para 17).

It is submitted that a specific policy recognising the benefits of mixed use schemes should be introduced.

In association with that policy, consideration should be given to identifying locations where such an approach would be appropriate. These could include problem sites, prominent sites etc.

We are willing to discuss this suggested approach further.

Response
 The existing primary employment areas and mixed commercial areas have been reviewed in light of comments received through the local plan process so far and amendments to designation have been proposed. Also both policies have been revised to provide for more flexibility, where appropriate on sites, with the proposal to designate current Mixed commercial areas as mixed use areas providing scope for a more balanced mix of uses.

Proposed Change
 Amend primary employment areas policy to read:
 Within Primary Employment Areas proposals for B1, B2 and B8 Uses will be acceptable. Sui generis uses may be appropriate in Primary Employment Areas dependent upon the nature of use but only where there would be no negative impact on other existing business premises. Proposals must demonstrate that any additional traffic generated by proposals can be satisfactorily accommodated on the surrounding road network.

In addition to B1, B2 and B8 uses there may be scope to accommodate the following types of uses on sites:

- Industrial/commercial training facilities
- Specialised leisure uses which cannot be accommodated centrally because of their scale or operational requirements/impacts.
- Small scale ancillary facilities which support the functioning of the Primary employment area.

Trade counters and retailing from employment premises will be restricted to that ancillary for the main operation of the B1/B2/B8 business. Planning conditions may be imposed to ensure that the use remains ancillary to the main operation. Use Class A1 premises will not be allowed on primary employment areas unless it is a small component of a servicing area for that employment area e.g. Kingmoor Park Hub or have been well-established in the existing employment area. Other Class A premises will be restricted in scale and permitted development rights to change to A1 may be removed

Where there is no reasonable prospect of an entire employment site being used for employment use; interventions to improve the attractiveness of the site are not feasible and; its release would not impact on the wider strategy for employment land or the availability of local provision, applications for alternative uses of land or buildings should be treated on their merit having regard to market signals and the relative need for different land uses to support sustainable local communities.

Permission will be given for redevelopment or change of use where the site adversely affects neighbouring residential properties or local amenity and this adverse effect is removed. Permission will only be granted where the proposed alternative development would be appropriate in terms of scale and design to the surrounding area and the amenity of adjacent premises would not be prejudiced.

Sui generis uses may be appropriate in Primary Employment Areas dependent upon the nature of use but only where there would be no negative impact on other existing business premises.

In the Sandysike/Whitesyke areas proposals for the redevelopment and extension to existing industrial and warehousing premises will be acceptable provided that:

1. the proposal does not have an adverse impact on the landscape; and

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- 2.the proposal does not involve the loss of existing tree cover; and
- 3.where appropriate, opportunities are taken to reinforce existing landscaping; and
4. adequate access and appropriate parking are provided.

Amend Mixed Commercial areas to read:

Policy 3 - Mixed Commercial Use Areas

Within Mixed Commercial Areas, proposals for a range of uses B1 (Business), B2 (General Industrial) and B8 (Warehousing) uses will generally be acceptable. A1 (Retail) and A2 (Financial and Professional) will only be acceptable if a sequentially preferable location within a Primary Retail Area Primary Shopping Area is either not available or suitable for the proposed use, and that the proposed site can be defined as an edge-of-centre location. Additionally retail developments over 200m2 and A2 development over 2,500m2 applicants will be required to undertake an impact assessment.

Proposals for residential development may be acceptable, subject to a satisfactory relationship with existing uses, and provided that there would be no loss of operational employment land.

In all cases the following criteria must be met:

1. the relationship of the site to the highway network is satisfactory and any additional traffic generated by proposals can be satisfactorily accommodated on the surrounding road network; and
2. access to the site is satisfactory; and
3. appropriate parking provision can be is provided; and
4. the scale of development is appropriate in relation to the site and the amenity of adjacent uses is not prejudiced.

Proposals for residential development may be acceptable, subject to a satisfactory relationship with existing uses, and provided that there would be no unacceptable loss of employment land.

0388	Objection	Policy	4.1	
090	Elizabeth Allnutt			
Detail	<p>The final sentence in this paragraph presupposes a support for business in the planning regime. While this may well be beneficial to the district and the region as a whole, this support needs to be tempered with provisos so that all aspects of sustainable development are considered. There are social and environmental aspects to sustainable development which must also be considered. The preferential support for business needs to be balanced out by the other considerations. A correction of the imbalance towards favouring economic issues/business in sustainable development.</p> <p>Suggest: At the least, insertion of phrases in 4.1 to the effect that planning permissions will only be awarded to business notwithstanding the issues and significance in other planning policies dealing with communities and the environment.</p> <p>Insertion in 4.2 of clauses to the effect that sites for employment and economic development will not be developed at the expense of communities. Rickergate was particularly hard hit and disregarded by Carlisle Renaissance's proposals for the development of our neighbourhood in the name of district wide economic development</p> <p>Readdress these policies in the Sustainability Appraisal</p>			
Response	<p>Agree that a greater emphasis could be put on all aspect of sustainable development to clarify that alongside economic aspect social and environmental considerations are also important in decision making in line with the NPPF.</p>			
Proposed Change	<p>Amend paragraph 4.1 to state: 'sustainable economic growth'.</p> <p>Amend last sentence of paragraph 4.2 to read: 'This plan will address the longer term needs and ensure that appropriate sites are brought forward to strengthen the local economy as well as providing for investment and redevelopment for existing businesses alongside social and environmental improvements.'</p>			

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o355	Comment	Policy	4.2	45
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o88	Elizabeth Allnutt	Save Our Streets		
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Detail SOS would suggest that appropriate sites for strengthening the local economy are not those with a resident community. If sites are chosen with residents in close proximity then every opportunity must be made to consult with and take appropriate action on the result of these consultations to prevent communities being disadvantaged.

Suggest: Insertion in 4.2 of clauses to the effect that sites for employment and economic development will not be developed at the expense of communities. Rickergate was particularly hard hit and disregarded by Carlisle Renaissance’s proposals for the development of our neighbourhood in the name of district wide economic development

Response Agree that additional text could be included in paragraph 4.2 to make reference to reference to social and environmental improvements to ensure that the local community is recognised.

Proposed Change Amend paragraph to read:
 4.2 The Carlisle Employments Sites Study along with work on the Local Economic Assessment and Economic Potential Study identify the strengths of the local economy along with indicators of where improvements are required to sustain economic growth. One of the key issues has been the quality and choice of employment locations for companies to invest. This plan will address the longer term needs and ensure that appropriate sites are brought forward to strengthen the local economy as well as providing for investment and redevelopment for existing businesses alongside social and environmental improvements.

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0990 Objection Policy 01

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:

- It is considered that Policy 1 should also look to identify a further employment site close to Junction 42 of the M6.
- The policy should be explicit about the economic strengths and ambitions for Carlisle and look to ensure that the employment sites can contribute to the delivery of these important aspirations.
- The policy should be clearer about the nature and scale of the proposed employment site at Harker to allow a fuller assessment of its implications.
- 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."
- At the end of the first paragraph of the policy add, "Sui generis uses may be appropriate in Primary Employment Areas dependent upon the nature of the use but only where there would be no negative impact on other existing business."
- The layout and uses at the proposed employment site at Morton needs to be compatible with nearby residential amenities.
- The Local Plan should refer to MOD Longtown highlighting its scale and importance and site should be identified within the subsequent proposals map.
- Policy within the Local Plan should make reference to the value of smaller scale employment proposals.

Response Policy 1 refers will be amended to refer to the development of a high value employment area as part of the Carlisle South Masterplan however the actual allocation will come through the development of the Carlisle South masterplan. The wording relating to the land at Harker will be refined to provide more clarity. Reference to MOD Longtown site will also be included within the policy and supporting text, consideration will be given to including this on the policies map. In respect of smaller scale employment proposals - this policy relates to allocations therefore more strategic sites, policy 2 would be more appropriate for reference to smaller scale proposals.

Proposed Change Amend policy to read:

Sui generis uses may be appropriate dependant upon the nature of the use but only where their would be no negative use on other exitsing businesses.

Land is allocated around Grearshill Farm to the North of junction 44 for employment development that would require a major electricity supply due to its proximity to Harker substation.

The Council will support the exploration of opportunities to utilise the site to maximise its economic potential of the MOD Longtown munitions base.

However, any use of this area 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

4.11 The potential of the Longtown munitions base is significant site due to its scale and the economic importance to the District. The recent announcement by the MoD to retain the site and explore commercial opportunities in areas such as logistics supply of: biomass fuel, food and retail, nuclear decommissioning/new build, and coal, is seen as very positive for the District. The site also has the potential as an effective dry port facility for onward distribution and redistribution creating linkages with the Port of Workington. The potential economic benefits of the Longtown site are highlighted in the Cumbria LEPs Strategic Economic Plan 2014-2024. Exploiting the potential of linkages with the Port of Workington is also identified as a priority key action within the Carlisle Economic Partnership Economic Review of Carlisle (January 2013).

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0428 Comment Policy 01

097 Amy Heys Environment Agency

Detail Nestle Factory Site in Dalston:
We have no objections to expansion within the existing site however there should be no encroachment into the River Calder floodplain.

Response There is no suggestion within the Local Plan that there will be expansion of the Nestle Factory.

Proposed Change No change required to the Plan as a result of this comment.

0436 Comment Policy 01

098 Sainsbury's Supermarkets Ltd A015

Detail Sainsbury's supports the aims of Policy 1 which will seek to ensure that sufficient employment and commercial land is provided to meet identified needs throughout the plan period. However, the policy as currently drafted does not refer to the benefits that small scale ancillary development of other uses on employment land can achieve. The provision of non-B Class Uses, such as retail, within employment locations could promote the creation of sustainable communities, by serving the retail and top-up needs of local communities. Retail uses can also provide an important buffer between residential and less sensitive land uses, e.g. Traditional employment uses.

Sainsbury's, therefore, recommends that the policy be amended to allow for retail uses of an appropriate scale in employment locations, to promote the benefits of mixed use development and adhere to the approach towards mixed use development contained within the Framework.

Response Policy 1 is primarily focused on the allocation of land for employment development, and therefore identifies the sites and outlines the uses that would be considered appropriate, it does not go into details of ancillary uses. Policy 2 primary employment areas provides more detail on this matter and sets out a range of uses that may be considered appropriate. This policy has been reworded to expand the scope of operations that may be deemed acceptable which should go some way to addressing the concerns raised.

Proposed Change No change to policy 1 as a result of this response.

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

0714 Comment Policy 01

151/23 Mr Bob Sharples Sport England

Detail

Sport and the economy Sport's contribution to the English economy reached 20.3 billion in 2010, 1.9% of the England total. This placed sport up in the top 15 industry sectors in England above motor vehicles, telecoms services, legal services, accounting, publishing, advertising and the utilities. Research commissioned by Sport England and carried out by AMION Consulting found an important and resilient sector. Employment Sport employment remains a crucial component of the economy. The number of people with sport-related jobs in 2010 is estimated at over 400,000 - that's 2.3% of all employment in England. Wider benefits Volunteering in sport, and the health benefits from sport, also have an impact on the economy. .The estimated economic value of sport-related volunteering is 2.7 billion .The annual value of health benefits from people taking part in sport is estimated at 11.2 billion Sport's value to England and the regions in 2008 Previous work into the economic value of sport also compared the value of the sport sector across the country. Read more about the economic impact of sport in England in 2008 and at a regional level by downloading the documents at <http://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/> Economic impact and regeneration There have been a number of studies on the economic impact of sport in recent years. The Cardiff Millennium Stadium and the City of Manchester Stadium both had a positive impact on local property markets, one study found. Other researchers have studied the economic impact of non-elite, mass-participation events such as marathons. They found such events can raise the profile of a host location and generate tourist income for minimal infrastructure investment. With reference to the economic benefits of sport in North West 2008 the following were the key messages: Consumer expenditure on sport in 2008 was 2,061 million, or 2.2% of total consumer expenditure in the region, representing a decrease of 10% compared to 2005. This is a direct consequence of the 2008 recession affecting the sport and leisure sectors more than other sectors of the economy. Sport-related economic activity increased from 1,784 million in 2003 to 2,082 million in 2008. The largest part of this economic activity (1,086 million, 52%) is generated by the commercial non-sport sector. Commercial sport increased its output in the examined period despite the 2008 recession. Within the commercial sport sector, during the period 2005 to 2008, spectator sports increased its GVA contribution by 20% reaching 187 million in value. However, during the same period the contribution of retailing decreased marginally. Despite the recession, sport-related employment in the North West grew marginally from 59,400 in the year 2005 to 59,500 in 2008. Over the same period, as a percentage of total employment, it remained stable at 1.9%. This is marginally above the national average at 1.8%. The better performance of employment compared to GVA indicators, imply that the first effect of the recession in the region was to reduce the profit margins. Economic Importance of Sport North West 2003-2008 http://www.sportengland.org/media/102798/economic-value-of-sport_north-west_full-report-2-.pdf Whilst Sport England does not have specific evidence on the economic impact that sport has on Carlisle, the economic value of sport to area should not be overlooked. Commercial indoor five aside, commercial indoor cricket, have been growing markets even in the most recent recession, creating employment and training opportunities on business parks. D2 uses therefore should be considered along side B1 uses, just as a number of gyms such as Virgin and Fitness First have been on business parks elsewhere in the country. E.g. Wolverhampton Business Park, Wolverhampton. Also it should not be overlooked that there is usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First D2 use, than a 100,000m2 B8 use. In conclusion, Sport England wishes the Carlisle's Planning department to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. And therefore should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this table.

Response Comments acknowledged. Leisure uses are subject to sequential and impact assessments in accordance with the NPPF therefore may not be appropriate on all employment sites. The Primary employment areas policy has been expanded to allow more scope for a broader range of uses acknowledging that there are situations where leisure uses may be appropriate on employment sites particularly where operators have very specific site/building requirements.

Proposed Change No change proposed as a result of this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0607	Objection	Policy	01	
128	Cllr John Mallinson	Carlisle City Conservative Group		
Detail	Employment sites in the surrounding hinterland of the airport should be encouraged to stimulate economic growth			
Response	The small industrial estates located adjacent to Carlisle airport will be identified on the policies map to ensure recognition that they are there and operational. The focus of the Plan is sustainable growth and therefore proximity to the M6 corridor is key to encouraging economic growth therefore we are seeking to allocate, through the Carlisle South Masterplan, an employment site to the south of Carlisle to maximise the potential of junction 42.			
Proposed Change	No change proposed as a result of this objection.			
0303	Comment	Policy	01	
078	Mr Trevor Wilson			
Detail	<p>Interesting to see that you have identified a site at Harker for a data centre. Good location being next to the electricity sub station. Even better would be next to a power station but then Carlisle does not have any power stations so Harker sub electricity station is the next best. I assume this site does not flood.</p> <p>However, you state 'any use would have to minimize any increase in traffic levels due to the capacity of the existing highway network and Junction 44 of the M6. Building a data centre will generate an increase in traffic during the build process. After the build process, expect traffic levels to fall as data centres are predominately a lot of space for servers, etc. and, by comparison, very little office space. So I would expect a minimal increase in traffic levels and therefore increased traffic will not be noticeable.</p> <p>But interesting that the statement is made that any data centre would have to minimise any increase in traffic levels. What will happen to all the other traffic generated by other developments to the north of Carlisle, such as Crindledyke by Story homes (planning ref 09/0617 page 251), site CA22 (page 252), site CA50 (page 252), Brunthill (page 49) and industrial developments at Kingmoor?</p> <p>The area shown on Map 4 Land at Harker north of J44 of the M6 page 50 is a huge area for a data centre. So presumably there will be other industrial developments on the land and it would be these other developments, i.e. non data centre, that would impact the traffic levels. If a data centre was built to fill the land area, then I would expect there would be an electricity supply problem, i.e. insufficient electricity. I assume that by data centre you do not mean a call centre.</p> <p>Review the statement regarding the data centre and amend accordingly.</p> <p>Review the entire document for all developments in the north of Carlisle that will generate traffic and consequential impact on the existing highway network at junction 44 of the M6.</p>			
Response	Cumbria County are advising on the highways implications of any potential allocations of land through the local plan. Other developments to the north of the river which have planning permission (existing commitments) will have had highways implications/traffic generation assessed through the planning application process and will be taken into account when considering any additional development. The area of land for the data centre has been slightly refined for the next stage of consultation however more detail is still being sought as to the actual scale and location of the proposed data centre. It is not the intention that alternative employment related development or additional employment development be developed on the site.			
Proposed Change	Amend wording to reflect refined area around Grearshill Farm: 'Land is allocated around Grearshill Farm to the North of junction 44 for employment development that would require a major electricity supply due to its proximity to Harker substation.'			
	No further amendment required as a result of this objection.			

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

0180 Support Policy 01

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail Chapter welcomes the identification of a high value employment area along the M6 corridor and recognises that, in the City's demographic spread, young and middle aged professional people are currently under-represented. Provided that skills training in the City can be matched with employer's requirements we would look particularly to this development to drive both the retention of young school and college leavers and recent University graduates. Such employment can create the potential for increased support of heritage attractions, of new and creative offers in music and the arts at the Cathedral and, through the Cathedral's outreach and mission, an increase in the social capital that the Cathedral can offer to the City and its many organisations.

Response Support acknowledged.

Proposed Change No change required as a result of this comment.

0445 Objection Policy 01

100 Richard Percival Carigiet Cowen

Detail I would like to express my disappointment that the site referred to as Site No. 52 – M6 North East of J42, Newlands Farm, Carleton in the Carlisle Employment Site Study undertaken by DTZ has not been included within the preferred employment site allocation options for the new draft plan. Despite scoring well in both the Market Attractiveness and Strategic Planning Factors sections of the Site Assessment Proforma. I understand that Policy S2 – Spatial Strategy of the Preferred Options documents, highlights the need to identify a broad location for growth in the area of Carlisle South and that it also refers to developing a high value employment area to attract high value jobs in a location which utilises the M6 corridor. With this in mind I would have thought the above site offers a perfect opportunity to meet those needs as well as providing an alternative site to help balance out the availability of large amounts of employment to the north of the City. Further text regarding National Grid.

Response 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.

Proposed Change Amend policy and supporting text to read:Develop a high value employment area, as part of the Carlisle South Masterplan, to attract high value jobs in a location which utilises the M6 corridor.

4.5Land to the South of Carlisle will be identified for longer term employment use as part of the Carlisle South Masterplan to take advantage of the good links with the M6 and provide additional employment opportunities alongside significant housing development and infrastructure improvements. Locating additional employment land to the South of the City will also help to rebalance the level and quality of provision to the North.

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

0149 Comment Policy 01

062 Church Commissioners for England A013

Detail The Commissioners support the allocation of land for employment development at Morton, as indicated on Map 2 (page 48). This development is complementary to the masterplan for South Morton. However, the area of land as shown on Map 2 is not consistent with the latest Phasing Plan for the site that was agreed with Carlisle City Council and approved on 4th February 2013. The area for employment development shown on Map 2 is larger than that which was originally agreed as part of the South Morton Masterplan and as shown on the approved Phasing Plan for the site and should be amended accordingly.

Response Agree that the map needs amending to show the correct site area.

Proposed Change Amend map to show correct site area.

0782 Comment Policy 01

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Whilst generally supporting this policy we are still concerned that the issues regarding limited opportunities being available given the dominance of key parties in the property market has still not been fully tackled. The statement in paragraph 4 that, "this needed to react to special circumstances", is not very helpful to potential investors and developers.

Response Policy 1 has identified additional employment land in Carlisle to add to the range and type of land available, including the intention to identify a future site as part of the Carlisle South masterplan. The Local Plan has a commitment to ensuring opportunities for maximising the economic potential of the M6 corridor in line with the LEP priorities. This should help broaden the range of employment sites within the District. The statement in paragraph 4 relates to the findings of the employment sites study and in response the Plan has identified a couple of sites for more specific uses including the allocation for a data centre at Gearshill and a Business Park at Morton. The detail of the employment site to the south of Carlisle will be worked up as part of the masterplan process.

Proposed Change No change as a result of the comment.

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

0485 Objection Policy 01

103 Kingmoor Park Properties A017

Detail

The policy references the need to develop a high value employment area in a location which utilises the M6 corridor, but it does not identify a site. Given that evidence points towards a need generally for qualitative, rather than quantitative improvements, the Council must be very careful not to oversaturated the market with employment land, as this will only serve to undermine the property market and reduce commercial property values significantly. Indeed a similar situation occurred with development at Parkhouse Road approximately 6 years ago, where the office market suffered from massive oversupply which led to a 25% drop in rents across the city.

These considerations are particularly relevant to the proposal to allocate land at Harker Industrial Estate for employment development requiring a major electricity supply. It is unfortunate, given the key findings of the Employment Sites Study that there appears to have been little or no engagement with KPPL regarding the land requirements for such a potential user, as the possibility of locating such a user could potentially be provided at Kingmoor Park / Brunthill.

Currently there is very little information, or background evidence available to explain the potential land take up of such a user (a data centre is mentioned) and it is challenging therefore for KPPL to offer a definitive view on the merits of the draft allocation.

What is apparent however is that KPPL's land at Harker is currently an underused asset. The buildings on site are old and increasingly difficult to maintain. Occupation levels are low and there is ample scope to relocate remaining occupiers to alternative employment sites / premises. KPPL has previously promoted the land for residential use as a viable alternative to employment, capable of delivering in the region of 300 family homes.

It is unclear if a high-energy user on the adjacent land would require the use of all or part of the Harker land. It may well be the case that if such a proposal was commercially sensible, such a use could be supported by KPPL. Alternatively HOW has experience in promoting mixed use schemes including residential and data centre uses, and it is clear that the two can co-exist alongside each other. Given the Council has a chronic shortage of previously-developed land, the redevelopment of Harker for residential use as part of or complimentary to an adjacent employment development should be welcomed and supported.

At this stage therefore KPPL supports the principle of Harker being redeveloped, and would suggest that the allocation of the site for a mixed use allocation, allowing for employment and residential uses should be supported. This would allow flexibility which is required at this stage until further details of the end-users requirements are established.

The justification for Policy 1 suggests there may be issues with 'limited opportunities given the dominance of key parties in the property market for employment sites'. KPPL strongly refutes this suggestion and questions the inclusion of this statement. It is unhelpful and has no place in the emerging Local Plan. If the Council considers there to be an issue in this regard discussions would be welcomed.

Response

The Plan recognises the importance and opportunities that are presented by the proximity of the M6 corridor and therefore in line with the LEP priorities identifies the scope to maximise the economic benefits. Years 11-15+ the preferred option within the Local Plan is to identify a broad location for growth to the South of Carlisle which will incorporate significant residential and employment development . Additional employment land to the South is considered important to help rebalance the distribution of population and employment land provision within Carlisle which is currently focused in the north and make use of an underused motorway junction (J42), the land would only be released in line with the masterplan and during the latter stages of the plan period to support the Local Plan's vision for managed growth which should help support development on other employment sites prior to release of the additional land. The Plan's strategy for growth does not only relate to housing development but also to the quantity and quality of a range of sites to attract new businesses and retain existing employers. The locational requirements of a data centre are quite specific and whilst the employment sites within the District were looked at the only site considered suitable was the one we have included within the Plan (control over neighbouring occupiers, access to a high voltage, reliable energy supply, site security). Discussions are ongoing about the extent of land and exact location required and will continue to inform the Local Plan process, the area that is being considered now excludes the KMP Harker Site. The Harker site has now been included as a proposed housing allocation.

The reference to 'limited opportunities given the dominance of key parties in the property market for employment sites' is linked to the finding of the employment sites study however the wording will be reviewed in light of this representation.

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

Proposed Change

Continue to seek clarification over the extent of the land requirements for the data centre to show more clearly on the policies map and within policy 1. Policy wording amended to clarify that the area being looked at related to Grearhill Farm not KMP Harker to read: Land is allocated around Grearhill Farm to the North of junction 44 for employment development that would require a major electricity supply due to its proximity to Harker substation.

Delete reference to Harker within policy and delete inclusion of map showing the site. Include new map showing Datacentre site relating to Grearhill Farm.

Delete reference in 4.4 to dominance of key parties.

0101 Comment Policy **01**

048 Keith Walker Linton Tweeds Ltd

Detail

Site: Westwood Nurseries, Orton Grange - Approx Site Area 2.8 ha [current land use is Commercial nursery and base for 3 landscape consultant and construction companies, small business offices and storage areas to let and a single detached house].
Allocation in Draft Local Plan: None [has been subject to several planning permissions]
Proposed Allocation: Mixed Commercial Development
Supporting background information given and maps enclosed.

Response

12/09/13 Phone call to Angela - Bruce Walker Director of Linton Tweeds would like to meet to discuss their options for the future in relation to their comments [also see 0100] Tel No: 07736 364337

It is not considered to be appropriate to designate this land as mixed commercial development the nature of the uses and location of the site would not appear to fully comply with the purpose of the policy. Any proposals for development would be treated on their own merits.

Proposed Change

No change proposed as a result of this objection.

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

0969 Comment Policy 01

005 Paul Barton Clerk to Dalston Parish Council

Detail
 Dalston PC Policy 3: Land at Barras Lane - extension to business park. Justification: An extension of the business park would provide extra employment land over the lifetime of the plan, if required.
 This site is reasonable well contained adjacent to the existing small industrial park. It can be contained within the existing landscape without prejudicing the wider area which is an important green space to the local community. The site requires landscaping through the use of native trees and hedgerows to its eastern and northern boundaries.

Dalston PC Policy 6: Site allocated for future mixed use or residential development. Justification: This is the site of an old mill which played an important part in Dalston's past. In recent times it has become less viable as a place for employment. Although the site is some distance from the centre of the village, it is an existing brownfield site that would lend itself to an attractive residential or mixed-use conversion.

Response Dalston PC policy 6 dealt with under rep 0970

In respect of the land adjacent to Barras Lane Industrial estate- this would appear to be logical as an extension to the site however access would have to be achieved via the existing estate as access to the land is currently via Hailway Cottages (residential). Whilst the allocation of the site has not been taken forward at this stage proposals to extend the site would be likely to be supported in principle. May be reviewed if additional information comes forward suggesting extra land may be required and that access can be satisfactorily achieved.

Proposed Change No change to plan at this stage

0093 Comment Policy 01

042 Mr & Mrs J Myers

Detail
 We don't agree to any plans to build any more houses or industrial development on the back of Alexandra Drive and to the west of Barley Edge. Any more development and we won't have any countryside left round our area plus our roads are not suitable for any more traffic. There is no proper footpath on the back of Scotby Road by the road leading up to the nunnery it is very bad walking up there. Plus the speed of the traffic.(same rep as 0092 Policy 19)

Response Dealt with under 0092, no industrial development proposed on the land within the draft Local Plan.

Proposed Change No change to plan as a result of this objection

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

0098 Objection Policy 01

046 Messrs Osgood A009

Detail My client objects to the exclusion of land identified east of Junction 42 [105ha - map enclosed] from the list of sites allocated under Policy 1 for employment development. They confirm that the land is available to be developed and would like to see this land brought forward for employment development. A list of supporting statements as to its suitability is given.

Response 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.

Proposed Change Amend policy and supporting text to read: Develop a high value employment area, as part of the Carlisle South Masterplan, to attract high value jobs in a location which utilises the M6 corridor.

4.5Land to the South of Carlisle will be identified for longer term employment use as part of the Carlisle South Masterplan to take advantage of the good links with the M6 and provide additional employment opportunities alongside significant housing development and infrastructure improvements. Locating additional employment land to the South of the City will also help to rebalance the level and quality of provision to the North.

0100 Objection Policy 01

048 Keith Walker Linton Tweeds Ltd

Detail Site: Shaddon Mills, Shaddongate - Site Area 0.8 ha
Allocation in Draft Local Plan: Primary Employment
Proposed Allocation: Mixed Commercial Development
Supporting background information given and maps enclosed.

Response 12/09/13 Phone call to Angela - Bruce Walker Director of Linton Tweeds would like to meet to discuss their options for the future in relation to their comments [also see 0101] Tel No: 07736 364337

Agree to amend the designation of the area identified to mixed commercial to more closely reflect the operation on the site.

Proposed Change Amend site to Mixed Commercial Area

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

0496 Objection Policy 01

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. No assessment or reference to the historic environment (including both designated and non-designated 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 consider that all development related to Carlisle Airport will be acceptable without any criteria to determine this. Several suggested amendments given

Response
 The Local Plan is a suite of policies which should be given consideration in the determination of planning applications. The heritage policies will be used when proposals could have an impact on the historic environment. It is therefore unnecessary to go into detail on heritage matters within individual policies. In relation the Carlisle Airport the policy does not consider all development to be acceptable it links to airport related development and associated business uses.

Proposed Change
 No change required as a result of this objection.

0546 Site Proposal Policy 01

115 Rachel Lightfoot Positive Planning Solutions Ltd

Detail
 Kingmoor House, Carlisle should be considered for employment opportunities at Kingstown Carlisle.

Response
 Whilst we are not proposing to allocate this land for employment development and at present its current use does not constitute its designation as a primary employment area - the sites proximity to Kingmoor Park and the improvements to the road network through the development of the CNDR would mean that proposals of this nature may well be acceptable in principle.

Proposed Change
 No change to the Plan as a result of this comment.

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

0560 Objection Policy 01

121 Mike Fox Brampton Economic Partnership

Detail
 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. 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.
 [Comment supported by Burtholme Parish Council]

Response
 Brampton has a range of industrial estates such as Townfoot Industrial Estate and employment premises as well as a wider range of retailers and service uses within the Town, it is therefore well placed to accommodate additional to help further support these services. Should the result be a demand for additional employment land/floorspace the Plan is flexible enough to allow for further development to take place. Carlisle Airport is included as an allocation within the local plan due to its strategic importance to the District.

Proposed Change
 No change proposed as a result of this objection.

0139 Support Policy 01 050 Map 4

060 Messrs Grieve, Carlyle & Graham A011

Detail
 Carlisle city Council recognised that this site has a number of key services close at hand and so put it forward in the Proposed Local Plan as a site suitable for development in terms of light industry/technology. Over the period of the last 3 months our clients have been approached by a number of developers looking at the site for Data Centres. It has all the services the developers are looking for, good lines of communications, fibre optic cable and above all an excellent power source. We understand that at least 3 of the developers interested in the site have contact Carlisle city Council directly to make enquiries. At this stage the developers that we have been talking to have expressed an interest in the site but that interest is subject to the land being included in the New Local Plan for Carlisle. We would therefore urge the Economic Development Dept within the City of Carlisle to ensure that this site is included within the Plan. There are very few sites around the UK that have the necessary infrastructure at hand to support such a development and there is a distinct and present need for this type of development.

Response
 Land at Grearshill Farm is identified for the development of a data centre which meets the locational and service requirements of the interested parties/operators. Further detail is still required as to the actual site area and location however there is a suggestion that this may incorporate some of the City Council's land to provide access.

Proposed Change
 Refine site to exclude Harker Industrial Estate to the North, focus on Grearshill Farm.

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

o89o	Comment	Policy	o1	49
187	Ken Hind			Clerk to Kingmoor Parish Council
Detail	Can consideration be taken on access to the Crindledyke Farm development?			
Response	This comment relates to the Brunthill employment allocation. This forms part of the wider Kingmoor Park employment site and therefore access is available within the existing highway network. Is in not proposed to create additional access points to Crindledyke.			
Proposed Change	No change required.			

o88o	Comment	Policy	o1	5o
184	Mrs Andrea McCallum			Clerk to Rockcliffe Parish Council
Detail	Rockcliffe Parish council queried the designation of this area as there was no legend visible on the map for the colour purple. This site is also being included as a site identified as an alternative option for preferred housing - Site OC23 Harker (page 274) clarification on the designation of this site is therefore considered necessary.			
Response	The Harker Industrial Estate site and land to the south is identified as a site for a specialist employment use - data centre. The actual site area has now been refined and excludes Harker IE., with the focus now being on Grearhill Farm. The actual extent of the area required has not been finalised and discussion are ongoing.			
Proposed Change	No change required as a result of this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1074	Comment	Policy 01	50	Map 4
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. 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. Public Rights of Way BW 120005 and FP 120004 cross the site and will need to be taken into account in any subsequent proposals.</p> <p>There are ordinary watercourses running through the site. Approximately 5- 10% of the site is shown on 1:100 year surface water mapping to be at risk of flooding</p> <p>No designated heritage assets affected, other than the potential setting of nearby grade II Harker Lodge. Would request any forthcoming application for this site be accompanied by the results of an archaeological desk-based assessment & evaluation.</p> <p>No minerals or waste constraints</p>			
Response	Information noted regarding site. Wording within supporting justification to be amended to reflect comments regarding the requirement to accommodate vehicle movements within existing highways network.			
Proposed Change	Justification wording relating to the site at Harker amended to state: However, any use of this area 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.			
0528	Objection	Policy 02		
119		Stainsby Garage Ltd	A018	
Detail	Land at London Road/Petteril Terrace, Carlisle. My client object to the identification of this site as a Primary Employment Area on the Local Plans Preferred Options Policy Map and as White land in respect of the former pfs and to its exclusion as a Mixed Commercial Area. Should be designated as a Mixed Commercial Area [also see objection 0529].			
Response	<p>The land adjacent to Petteril Terrace forms part of a wider primary employment area. The policy for primary employment area will be revised to broaden the scope for a range of uses considered appropriate to employment areas - this will include specialised leisure uses, training facilities and small scale ancillary facilities which support the functioning of the employment area. It is therefore not considered necessary to change the designation of the site, however there is provision within the policy, should there be no reasonable prospect in the future of the site being used for employment purposes (including those listed previously), to allow for alternative uses where supported by evidence/market signals.</p> <p>The former petrol filling station remains as white land as this reflects the sites current situation. A white land designation does not preclude development taking place it just indicates that no change is envisaged on the land, however should an application be submitted the proposal would be considered on its own merits.</p>			
Proposed Change	No change proposed as a result of this objection.			

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

0536 Objection Policy 02

112 Mr Connan A009

Detail Land to the East of Lorne Crescent, Denton Holme, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. It is considered that the designation of the land as a Mixed Commercial Area is appropriate [6 reasons listed] [also see rep 0537]

Response Agree to amending the designation in line with the comments made.

Proposed Change Amend site to be designated as a mixed use area.

0532 Objection Policy 02

110 S & R Hall Properties A018

Detail Land at the Maltings, shaddongate, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. The site has planning permissions for and is put to a varied mixture of uses including A1, Sui Generis (Auction) etc, it is considered that the designation of the land as a Mixed Commercial Area is appropriate. [Also see rep ref 0533]

Response Agree to amending the designation in line with the comments made.

Proposed Change Amend site to be designated as a mixed use area.

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

0715 Comment Policy 02

151/23 Mr Bob Sharples Sport England

Detail

Sport and the economy Sport's contribution to the English economy reached 20.3 billion in 2010, 1.9% of the England total. This placed sport up in the top 15 industry sectors in England above motor vehicles, telecoms services, legal services, accounting, publishing, advertising and the utilities. Research commissioned by Sport England and carried out by AMION Consulting found an important and resilient sector. Employment Sport employment remains a crucial component of the economy. The number of people with sport-related jobs in 2010 is estimated at over 400,000 - that's 2.3% of all employment in England. Wider benefits Volunteering in sport, and the health benefits from sport, also have an impact on the economy. .The estimated economic value of sport-related volunteering is 2.7 billion .The annual value of health benefits from people taking part in sport is estimated at 11.2 billion Sport's value to England and the regions in 2008 Previous work into the economic value of sport also compared the value of the sport sector across the country. Read more about the economic impact of sport in England in 2008 and at a regional level by downloading the documents at <http://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/> Economic impact and regeneration There have been a number of studies on the economic impact of sport in recent years. The Cardiff Millennium Stadium and the City of Manchester Stadium both had a positive impact on local property markets, one study found. Other researchers have studied the economic impact of non-elite, mass-participation events such as marathons. They found such events can raise the profile of a host location and generate tourist income for minimal infrastructure investment. With reference to the economic benefits of sport in North West 2008 the following were the key messages: Consumer expenditure on sport in 2008 was 2,061 million, or 2.2% of total consumer expenditure in the region, representing a decrease of 10% compared to 2005. This is a direct consequence of the 2008 recession affecting the sport and leisure sectors more than other sectors of the economy. Sport-related economic activity increased from 1,784 million in 2003 to 2,082 million in 2008. The largest part of this economic activity (1,086 million, 52%) is generated by the commercial non-sport sector. Commercial sport increased its output in the examined period despite the 2008 recession. Within the commercial sport sector, during the period 2005 to 2008, spectator sports increased its GVA contribution by 20% reaching 187 million in value. However, during the same period the contribution of retailing decreased marginally. Despite the recession, sport-related employment in the North West grew marginally from 59,400 in the year 2005 to 59,500 in 2008. Over the same period, as a percentage of total employment, it remained stable at 1.9%. This is marginally above the national average at 1.8%. The better performance of employment compared to GVA indicators, imply that the first effect of the recession in the region was to reduce the profit margins. Economic Importance of Sport North West 2003-2008 http://www.sportengland.org/media/102798/economic-value-of-sport_north-west_full-report-2-.pdf Whilst Sport England does not have specific evidence on the economic impact that sport has on Carlisle, the economic value of sport to area should not be overlooked. Commercial indoor five aside, commercial indoor cricket, have been growing markets even in the most recent recession, creating employment and training opportunities on business parks. D2 uses therefore should be considered along side B1 uses, just as a number of gyms such as Virgin and Fitness First have been on business parks elsewhere in the country. E.g. Wolverhampton Business Park, Wolverhampton. Also it should not be overlooked that there is usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First D2 use, than a 100,000m2 B8 use. In conclusion, Sport England wishes the Carlisle's Planning department to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. And therefore should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this table.

Response Comments noted.
The Policy and supporting justification have been expanded, to reflect the NPPF, allowing for amongst other things specialist leisure use to locate on Primary Employment Areas. This relates to proposals which because of their scale or operational requirements/impacts cannot be located elsewhere.

Proposed Change Amended policy to include:In addition to B1, B2 and B8 uses there may be scope to accommodate the following types of uses on sites:
-Industrial/commercial training facilities
-Specialised leisure uses which cannot be accommodated centrally because of their scale or operational requirements/impacts.
-Small scale ancillary facilities which support the functioning of the Primary employment area.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0568	Objection	Policy	02	
122	Bob Taylor	Taylor & Hardy		
Detail	<p>The DTZ Employment Land Study 2010 which forms part of the Evidence Base for the Local Plan makes clear that there is a substantial supply of employment land estimated at between 30 to 85 years supply.</p> <p>In those circumstances there is no imperative to restrict the flexibility that the NPPF recognises in para 21.</p> <p>The Evidence Base recognises that there are qualitative issues with existing employment land. The concern expressed in the Local Plan regarding piecemeal and random implications of a relaxation of policy impacting upon attractive employment areas could be addressed by drawing a policy distinction between such sites and those more unattractive areas where redevelopment should be positively encouraged.</p> <p>The policy as currently formulated is considered to be unsound.</p> <p>We are willing to be involved in discussions to suggest means of re-drafting the policy.</p>			
Response	<p>Agree that the policy should allow more scope for a range of uses allowing for flexibility in line with the NPPF. Amend policy to include text detailing a wider range of possible uses.</p>			
Proposed Change	<p>Amend the policy to include: In addition to B1, B2 and B8 uses there may be scope to accommodate the following types of uses on sites:</p> <ul style="list-style-type: none"> -Industrial/commercial training facilities -Specialised leisure uses which cannot be accommodated centrally because of their scale or operational requirements/impacts. -Small scale ancillary facilities which support the functioning of the Primary employment 			
0530	Objection	Policy	02	
109		Alexandra Sawmills		A018
Detail	<p>Former Alexandra Sawmills, Willowholme, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. It is considered that the designation of the land as a Mixed Commercial Area is appropriate. [Also see rep ref 0531]</p>			
Response	<p>Whilst the site is no longer operational as a sawmill, it is still considered appropriate to retain it as an employment site. The primary employment areas policy is being revised to allow for more flexibility with a wider range of uses potentially being considered to be acceptable.</p>			
Proposed Change	<p>No change to plan as a result of this objection.</p>			

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

0437 Comment Policy 02

098 Sainsbury's Supermarkets Ltd A015

Detail Sainsbury's supports the aims of Policy 2 and the Council's acknowledgement that the change of use of buildings I land within employment areas can remove adverse effects on neighbouring residential properties or local amenity.

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.

Response The intention of the policy is to ensure that sufficient land is available in employment use to support business and allow for economic growth and development. It is also recognised that in line with the NPPF policies should allow for flexibility and therefore the policy has been amended to allow more scope for a range of uses which would potentially include retail of an appropriate scale to the site and operations.

Proposed Change In addition to B1, B2 and B8 uses there may be scope to accommodate the following types of uses on sites:
Amend the policy to include:
-Industrial/commercial training facilities
-Specialised leisure uses which cannot be accommodated centrally because of their scale or operational requirements/impacts.
-Small scale ancillary facilities which support the functioning of the Primary employment

0444 Objection Policy 02

099 Simon Thomas & Shelly Bullman Joint Administrators Newtown Ind A016

Detail [Link to Rep 0443 Policy 19] Policy 2 of the Preferred Options document and the Carlisle Urban Area Policy Map, which are the subject of this consultation, propose to maintain the allocation of Newtown Industrial Estate for employment use as part of a continued designed Primary Employment Area.
We object to Policy 2 for reasons relating to the supply of employment land in Carlisle, the supply of housing land and the absence of market interest in the former printworks site for on-going B Class uses.

Response The ELR states that the entire Newtown Road employment site should be invested in however not earmarked for any potential funding to improve the access or provide environmental improvements in line with the report recommendations. The site subject of this objection has been marketed for the past 18 months with no demand. The consultee states that the original occupation of the premises ended approx 15 years ago. There were a number of subsequent uses, although the building is now vacant. The NPPF states that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose.

Proposed Change Site allocated for housing development with indicative yield of 40.

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

0783 Support Policy 02

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted

Proposed Change No change required as a result of this support

0991 Objection Policy 02

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
 - 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".
 - Within the second paragraph add additional text stating: "Where there is no reasonable prospect of a site being used for the allocated employment use; interventions to improve the attractiveness of the site are not feasible and; its release would not impact on the wider strategy for employment land or the availability of local provision, applications for alternative uses of land or buildings should be treated on their merit having regard to market signals and the relative need for different land uses to support sustainable local communities".
 - Within the policy, the following text should be included; "traffic generated by proposals can be satisfactorily accommodated on the surrounding road network;"

Response Agree to amend text to more closely reflect the NPPF by stating that different land uses may be considered where there is no reasonable prospect of employment uses coming forward on an employment site. Also agree to suggested text regarding traffic generation.

Proposed Change Policy amended to include: Proposals must demonstrate that any additional traffic generated by proposals can be satisfactorily accommodated on the surrounding road network.

Where there is no reasonable prospect of an entire employment site being used for employment use; interventions to improve the attractiveness of the site are not feasible and; its release would not impact on the wider strategy for employment land or the availability of local provision, applications for alternative uses of land or buildings should be treated on their merit having regard to market signals and the relative need for different land uses to support sustainable local communities.

Also inclusion within the supporting text: This policy will help to encourage investment in all employment areas with the key aim of retaining employment uses to provide the wide variety of sites required for existing business in Carlisle district, whilst also allowing for flexibility where there is no reasonable prospect of a site being used for employment use and interventions to improve the attractiveness of the site are not feasible.

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

0539 Objection Policy 02

047 McKnight & Son Builders A009

Detail Land at Collingwood Street, Denton Holme, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. The site is subject to a current planning permission [09/0815] for a mixed use development, as such it should be designated as a Mixed Commercial Area. [further reasons given] [also see rep 0540]

Response Agree to amending the designation in line with the comments made.

Proposed Change Amend site to be designated as a mixed use area.

0138 Objection Policy 02

059 BSW Timber PLC A004

Detail Site: BSW Timber PLC, Carlisle Sawmills, Cargo, Carlisle
My client object that this site is not identified as being a Primary Employment Area. The land benefits from several planning consents [33 listed from 1986 to 2011] so ought to be specifically identified in the Carlisle District Local Plan 2015 - 203 as a Primary Employment Area subject to Policy 2

Response Recognise that this site is in employment use. Agree that this can be recognised within the Plan as a Primary employment Area - extent of BSW site to be established.

Proposed Change Amend Plan to recognise site as Primary Employment Area.

0188 Objection Policy 02

068 CN Group A004

Detail Land at Dalston Road, Carlisle [plan attached]
It is considered that the inclusion of this land/property within a Primary Employment Area is wholly inappropriate and ought to be re-zoned as Mixed Commercial Development as this would more accurately reflect:
- the mixed commercial character of the area within which the site is situated
- the mix of existing use on adjacent sites. This mix including, in addition to employment, retail; offices and food and drink
- the type of development which, in recent years, has occurred on adjacent sites
- the commitments/allocations in the Draft Local Plan for future development on adjacent sites
- in the context of the preceding, the broad range of land uses which would be appropriate for the land/property subject of this objection if it were, in the future, to be partially or wholly redeveloped.

Response Recognise that the range of uses on this site are more varied than primary employment therefore agree to change the designation to mixed use to reflect the current range of uses.

Proposed Change Change the designation of the site to mixed use area.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0037	Objection	Policy 02	52	
018		The Border Group	A004	
Detail	The documents which comprise of the package of papers upon which comments are sought do not include a Policy Map which is District Wide. In the absence of such a map it is highlighted that as the land owned by my clients benefit from 9 Planning Consents (listed), it ought as a whole, be specifically identified in the Plan as a Primary Employment Site subject of Policy 2. [land at Woodlands, Sandysike/Whitesyke].			
Response	The policies map for the wider rural area was not published as part of the preferred options consultation. However Whitesyke and Sandysike are still identified as primary employment areas, this will be shown on the policies maps that will be available as part of the preferred options consultation stage 2.			
Proposed Change	No change required as part of this consultation.			
0497	Objection	Policy 02	52	
104	Emily Hrycan	English Heritage North West		
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 in the plan of these areas or heritage assets been identified to inform this policy. [Same as Rep 0498 Policy 3] Several suggested amendments given			
Response	Primary employment areas are operational sites and are therefore already established - this is recognised through their designation. Any proposals for additional development in these areas or intensification of the uses would be considered against the full suite of policies provided in the Local Plan included those relation to heritage assets where appropriate and relevant.			
Proposed Change	No change required as a result of this objection.			
0537	Objection	Policy 03		
112	Mr Connan		A009	
Detail	Land to the East of Lorne Crescent, Denton Holme, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. It is considered that the designation of the land as a Mixed Commercial Area is appropriate [6 reasons listed] [also see rep 0536]			
Response	Agree to amending the designation in line with the comments made.			
Proposed Change	Amend policies map to designate the area as Mixed use.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0570	Comment	Policy	03	
122	Bob Taylor	Taylor & Hardy		
Detail	The policy approach for Mixed Commercial Areas is generally supported. In referring to Retail and Financial and professional uses in such areas the word "only" is not only unnecessary since the tests referred to in the policy have to be met but sends an anti-development message contrary to the purpose of national policy as set out in the NPPF.			
Response	Objection noted, policy wording can be amended to remove the word 'only' from the policy.			
Proposed Change	Amend second sentence of the policy to read: 'A1 (Retail) and A2 (Financial and Professional) will be acceptable is a sequentially preferable location within a primary shopping area is either not available or suitable for the proposed use,....'			
0438	Comment	Policy	03	
098		Sainsbury's Supermarkets Ltd		A015
Detail	Sainsbury's support the aims of Policy 3 and wish to highlight the benefits that mixed use development can make towards creating sustainable communities. However, it is recommended that the sequential approach towards retail development within mixed use areas is brought in line with national guidance to ensure that the policy is sound.			
Response	Agree to amend the sequential approach to ensure that the wording is in line with the NPPF and make reference to the impact assessment.			
Proposed Change	Amend policy to ensure accordance with the NPPF.			
0498	Objection	Policy	03	
104	Emily Hrycan	English Heritage North West		
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 in the plan of these areas or heritage assets been identified to inform this policy. [Same as Rep 0497 Policy 2] Several suggested amendments given			
Response	Primary employment areas are operational sites and are therefore already established - this is recognised through their designation. Any proposals for additional development in these areas or intensification of the uses would be considered against the full suite of policies provided in the Local Plan included those relation to heritage assets where appropriate and relevant.			
Proposed Change	No change required as a result of this objection.			

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

0529 Objection Policy 03

119 Stainsby Garage Ltd A018

Detail Land at London Road/Petterill Terrace, Carlisle. My client object to the identification of this site as a Primary Employment Area on the Local Plans Preferred Options Policy Map and as White land in respect of the former pfs and to its exclusion as a Mixed Commercial Area. Should be designated as a Mixed Commercial Area [also see objection 0528].

Response The land adjacent to Petteril Terrace forms part of a wider primary employment area. The policy for primary employment area will be revised to broaden the scope for a range of uses considered appropriate to employment areas - this will include specialised leisure uses, training facilities and small scale ancillary facilities which support the functioning of the employment area. It is therefore not considered necessary to change the designation of the site, however there is provision within the policy, should there be no reasonable prospect in the future of the site being used for employment purposes (including those listed previously), to allow for alternative uses where supported by evidence/market signals.

The former petrol filling station remains as white land as this reflects the sites current situation. A white land designation does not preclude development taking place it just indicates that no change is envisaged on the land, however should an application be submitted the proposal would be considered on its own merits.

Proposed Change No change proposed as a result of this objection.

0992 Objection Policy 03

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
 - 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.
 - Point 3 to this policy should be amended to the following:- "Appropriate parking provision is provided; and"
 - In addition, the following addition point should be included in the policy "traffic generated by proposals can be satisfactorily accommodated on the surrounding road network;"

Response Agree to suggested additional text, considered appropriate and would provide greater clarity and detail.

Proposed Change Amend policy to include: Only after these options have been fully exhausted will a well connected accessible out of centre site be considered. Additionally retail developments over 2000m2 and A2 development over 2,500m2 applicants will be required to undertake an impact assessment.

1. the relationship of the site to the highway network is satisfactory and any additional traffic generated by proposals can be satisfactorily accommodated on the surrounding road network;

appropriate parking provision can be is provided; and

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

0540 Objection Policy 03

047 McKnight & Son Builders A009

Detail Land at Collingwood Street, Denton Holme, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. The site is subject to a current planning permission [09/0815] for a mixed use development, as such it should be designated as a Mixed Commercial Area. [further reasons given] [also see rep 0540]

Response Agree to amending the designation in line with the comments made.

Proposed Change Amend site to be designated as a mixed use area.

0533 Objection Policy 03

110 S & R Hall Properties A018

Detail Land at the Maltings, Shaddongate, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. The site has planning permissions for and is put to a varied mixture of uses including A1, Sui Generis (Auction) etc, it is considered that the designation of the land as a Mixed Commercial Area is appropriate. [Also see rep ref 0532]

Response Site designation has been reviewed and it is agreed that it would be more appropriate to designate it as a mixed use area to reflect the range of uses operational in the area.

Proposed Change Amend designation to Mixed use area.

0531 Objection Policy 03

109 Alexandra Sawmills A018

Detail Former Alexandra Sawmills, Willowholme, Carlisle. My client objects to the identification of the land as a Primary Employment Area on the Policy Map and its exclusion as a Mixed Commercial Area. It is considered that the designation of the land as a Mixed Commercial Area is appropriate. [Also see rep ref 0533]

Response Despite the site no longer being operational as a sawmill it is considered that its designation should remain as primary employment area. It is proposed that the primary employment areas policy be amended to allow greater scope for a wider range of uses in accordance with the NPPF. Willowholme (adjacent) is designated as a primary employment area and retaining the former sawmill site as a primary employment area would seem most appropriate. There is scope within the policy to allow for alternative uses where there is no prospect of an entire site being used for employment - therefore should this be the case throughout the plan period provision is in place to allow for change. However at present the site does not warrant a change in designation.

Proposed Change No change proposed as a result of this objection.

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

0553	Objection	Policy 03		
120		Possfund Custodian Trustees Limit	A019	

Detail

The Policy Map identifies a number of mixed commercial areas in and around the City Centre. The mixed commercial areas include a range of sites, including the terraced commercial properties along Botchergate. The policy favours B1, B2 and B8 employment uses in all of these areas, which is not a realistic prospect for many of the properties in the mixed commercial area. This is also inconsistent with Policy S5, which supports proposals for 'the consolidation and improvement of the leisure and retail uses' within Botchergate, none of which are Class B uses.

The justification text highlights the NPPF commentary that it does not restrict economic growth to only the B use classes of development, yet the policy itself is drafted vary much as a traditional Class B employment policy. We would recommend a review of the policy to emphasise that a broad range of economic uses could be supported in this area of the City.

The requirement for a sequential test for Class A1 and A2 uses is narrower than the NPPF test, omitting reference to viability and also limiting the possibility that sites might be acceptable to edge of centre locations only. The policy as drafted is therefore not in accordance with the NPPF.

Response

The policy has been amended to refer to a range of uses. Refer to the impact assessment has been included.

Proposed Change

Policy amended to read: Policy 3 - Mixed Use Areas

Within Mixed Commercial Areas, proposals for a range of uses B1 (Business), B2 (General Industrial) and B8 (Warehousing) uses will generally be acceptable. A1 (Retail) and A2 (Financial and Professional) will be acceptable if a sequentially preferable location within a Primary Shopping Area is either not available or suitable for the proposed use, and that the proposed site can be defined as an edge-of-centre location. Only after these options have been fully exhausted will a well connected accessible out of centre site be considered. Additionally retail developments over 200m² and A2 development over 2,500m² applicants will be required to undertake an impact assessment.

Proposals for residential development may be acceptable, subject to a satisfactory relationship with existing uses, and provided that there would be no loss of operational employment land.

In all cases the following criteria must be met:

1. the relationship of the site to the highway network is satisfactory and any additional traffic generated by proposals can be satisfactorily accommodated on the surrounding road network; and
2. access to the site is satisfactory; and
3. appropriate parking provision is provided; and
4. the scale of development is appropriate in relation to the site and the amenity of adjacent uses is not prejudiced.

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

0579 Comment Policy 03
 124 Ediston Properties/Whitbread Grou A020

Detail
 Policy 3 confirms that in existing mixed commercial areas B1, B2 and B8 uses will generally be supported. A1 and A2 will only be supported if criteria forming part of the policy are satisfied.
 Policy 3 specifically concerns business uses, i.e., B1, B2 and B8, and it is misleading that the policy as drafted indicates that it deals with commercial areas. Policy 3 would be more clear and effective if it were to be re-titled Policy 3 – Business Areas.
 To complement Policy 3 as proposed to be altered as set out above the Council is invited to formulate and propose a new policy which deals with other commercial uses/areas.
 Like Policy 3, the new policy would deal with other uses and criteria needing to be satisfied should the existing use be proposed for redevelopment. The policy could be termed Policy** - Commercial Areas (new Policy).

Response
 This policy is distinct from the primary employment areas policy which deals more specifically with B1, B2 and B8 uses allowing for the provision of A1 And A2 uses as well as residential uses. More flexible wording is proposed allowing for a greater degree of change within the parameters of the policy to ensure compatibility. Retail proposals may be considered appropriate provided they meet the tests contained with the NPPF and residential may also be appropriate provided there is compatibility with the surrounding existing uses.

Proposed Change
 Policy wording to be amended slightly to allow for more flexibility include 'range of uses' to first line, bring the reference to residential development further up the policy to make it more prominent.

0993 Objection Policy 04
 194 Michael Barry Cumbria County Council

Detail
 Background information submitted. Suggested Changes:
 - 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.
 - 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."

Response
 Agree - policy s5 will be expanded to include detail regarding development oppotunities in the City Centre in line with the City Centre Masterplan. Amend criterion in line with suggestion.

Proposed Change
 Amend crietrimon to read: satisfactory access to service vehicles is provided

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

0572 Objection Policy 04

122 Bob Taylor Taylor & Hardy

Detail It is impossible to comment in any meaningful way on Policy 4 referring to Primary Retail Areas in the absence of any definition of such areas on the proposals map. Similar comments apply to Policy 5 Primary Shopping Frontages. Policy 6 refers to the City Centre. The Proposals Map indicates an extensive potential area much greater than currently indicated. We assume that Consultation will take place both on the defined area and the relevant policies. At this time we consider that other location such as Shaddongate / Caldewgate could be included in this designation with the prospects of better spin off to the City Centre Core than areas such as St Nicholas.

Response Since consultation more work has been undertaken on the City Centre masterplan and this is continuing. The Stage 2 Preferred Options will contain more detail for the City Centre including development site options. Work will continue to refine the detail for this area.

Proposed Change No change proposed at this stage

0759 Comment Policy 04

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail City centre's have irrevocably changed and there is no point in trying to have a sentimental vision of the past. The local plan should be the starting point for a bold new world, helping to develop a unique vibrant community hub. The city centre should become the driving force behind economic recovery. The city centre can no longer be just a primary retail area, it needs to incorporate other uses such as, health, housing, arts, entertainment, business and office space developing day, evening and night time cultures where shopping is just part of the total plan. As it is written at the moment the local plan does not recognise this need for the more business like approach to the city centre. The local plan should be used to set an objective to repopulate the city centre as a bustling community hub encouraging the varied uses that are needed to develop this hub. Policies should be in place to encourage successful independent retailers into the city centre. Change of use policies should encourage wider uses that are needed to make the city centre more commercially successful. The local plan should encourage the development of a city centre business plan covering all aspects of city centre life, not just planning.

Response Comments noted

Proposed Change No change proposed.

0803 Support Policy 04

158/33 Mrs Julie Templeton

Detail I agree with proposals for the redevelopment, refurbishment or adaptation of existing shop premises within the Primary Retail Area if they enhance or do not adversely affect the townscape.

Response Support noted

Proposed Change No change required to policy as a result of this comment.

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

0356 Objection Policy 04

088 Elizabeth Allnutt Save Our Streets

Detail
 It is not possible to comment meaningfully on a policy dealing with retail areas without being able to refer to the City Centre Master Plan. As a community on the edge of the City Centre SOS would endorse the policy but would add some further issues, mainly concerned with enhancing the vitality and viability of the area.

- Positive support for small, independent local business.
- Positive development support for opening first floor apartments and other marginal properties for residential use
- Positive support for short-term, alternative uses for retail spaces which would contribute to the retail of the area. Usage is better than a shut up premises.
- Parking provision is considered
- Commercial concerns do not outweigh the importance of other functions for primary retail areas. Although the City Centre is the main example of how other services and objectives can be met in a retail area, it should be remembered that local High Streets or even local parades of shops have a significance for a local community beyond their retail value as a meeting place and adjunct to other services.

Suggest: Policies which support the use and development of primary retail areas for functions other than retail.

Response
 These comments are noted. Work is ongoing with the City Centre Masterplan and these comments will feed into it. A policy covering Regeneration and Strategic Retail in the City Centre and Botchergate will be included in the Preferred Options Stage 2 consultation which will take on board the work done so far providing a range of development site options. This will be further developed and more information will be made available for comment over the next few months.

Proposed Change
 No change proposed as a result of this objection at this stage.

0439 Comment Policy 04

098 Sainsbury's Supermarkets Ltd A015

Detail
 Sainsbury's supports the Council's intention to protect Town Centres within Policy 4. More detailed comments are reserved until the Primary Retail Area of Carlisle is defined once the City Centre Masterplan has been published.

Response
 Comments noted

Proposed Change
 No change required to policy at this stage as a result of this comment

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0554	Objection	Policy	04	
120		Possfund Custodian Trustees Limit	A019	
Detail	<p>The draft policy seeks to preserve Class A1 uses in the Primary Retail Area. It also notes that the primary retail area is to be used as the main town centre reference for any sequential test to be undertaken. However, the Policy Map does not identify what the Primary Retail Area is intended to be. It is therefore not possible at this stage to conclude whether we support the draft policy.</p> <p>The Glossary at Annex 2 of the NPPF defines primary shopping area as 'Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).</p> <p>The Primary Shopping Area extends significantly beyond the Primary Retail Area as shown on the Adopted Carlisle Local Plan Proposals Map. It includes those secondary frontages which are contiguous and closely related to it, including retail uses along Botchergate.</p> <p>In Carlisle, primary and secondary retailing extends from the heart of the City Centre along the full length of Botchergate, including at St Nicholas Gate Retail Park. The mix of uses along Botchergate is predominantly leisure and class a uses, including a significant proportion of retail.</p> <p>Based on our analysis of existing uses in the centre, the primary shopping area covers an area from West Tower Street to beyond Lancaster Street.</p> <p>The policy as drafted also seeks to protect retail uses in the City Centre from changes of use. The policy does not fully reflect the 'consultation so far' comments, which highlights 'the main aim is to support the maintenance and enhancement of the vitality and viability of city and town centres through encouraging an appropriate balance and diversity of uses within each Centre, including the retention of a suitable level of retail activity.'</p>			
Response	<p>Work is still ongoing with the City Centre Masterplan, more detail for the City Centre will be provided in the stage 2 preferred options which will include development site options to meet the retail needs identified within the Retail study 2012. The Primary Shopping Area is also defined taking on board the recommendations from the Retail Study evidence base which identified how the existing areas should be amended.</p> <p>In respect of the comments relating to the restrictions on change of use, this is included in the context that a significant concentration of non retail uses within the Primary shopping area could undermine the viability and vitality of the shopping area. The supporting text has been further expanded to state that The City Council will therefore resist proposals for change of use, or the conversion of retail premises which would result in a loss of retail provision and have an impact on the vitality and viability as a retail area reducing consumer choice and the diversity of the retail offer. Restaurants and cafes may be permitted because of their contribution to the vitality of the primary shopping area.</p>			
Proposed Change	No change required to policy at this stage.			

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

0499 Objection Policy 04

56

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. The historic environment should be considered in delivering a number of other planning objectives.
 The previous consultation on the Local Plan highlighted the need to improve the primary retail areas whilst combining it with "its historic attractiveness". 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".
 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.
 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.
 Suggest: 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.

Response
 The City Centre masterplan will provide an overview of the character areas within Carlisle City Centre, this considered the development constraints that exist as a result of Carlisle's historic environment. Further detail will also be added to the proposals maps identifying areas of key townscape frontage which includes buildings which form part of the Local List. The Masterplan will continue to inform development of the Local Plan with recognition being given to heritage matters when considering development site options.

Proposed Change
 No change proposed as a result of this objection.

0784 Comment Policy 05

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail
 Whilst supporting this policy we refer to our comments regarding the primary shopping area and the need for non-retail activities to be encouraged. Consideration should also be given to bars/restaurants on the Lowther Street/ Scotch Street frontage to help improve the vibrancy of the city centre.

Response
 Agreed. Policies for retail in the city centre will need to be flexible to account for the changing nature of city centres away from being primarily retail orientated. These policies will be updated using data from the city centre masterplan, though they do already look to relax limits on non-retail uses within the city centre.

Proposed Change
 Ensure flexible approach to non-retail uses within the city centre is retained once retail policies are updated by the city centre masterplan.

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

0555 Comment Policy 05

120 Possfund Custodian Trustees Limit A019

Detail No primary shopping frontage is identified on the policy map, therefore it is not possible to comment in detail on this policy at this stage.

Response Noted. The extent of Primary Shopping Frontage will be informed by the City Centre Masterplan. City Centre policies will be updated using the data presented in the Masterplan. These policies and designations will be consulted on as part of a second preferred options consultation in the Spring 2014.

Proposed Change No change.

0994 Objection Policy 06

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
 - 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.

Response The policy states that the sequential and Impact test should be applied to retail proposals over 200m².

Proposed Change No change required as a result of this objection.

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

0556 Objection Policy 06

120 Possfund Custodian Trustees Limit A019

Detail

Draft Policy 6 proposes criteria for retail proposals on unallocated sites outside of the City Centre. However:

Allocated sites: It is not yet clear which sites are allocated in the Plan. We recommend that this is clarified to include those sites identified as Large Stores and Retail Warehouses and allocations for new development, including St Nicholas Gate Retail Park.

Policy criteria: The draft policy proposes a number of criteria against which retail proposals outside of the City Centre would be assessed. The policy criteria are inconsistent. For instance (1) states that there is an essential requirement to transfer bulky customer loads from store to car, yet (2) requires sites to be widely accessible by public transport. If only retailers selling bulky items are permitted, it seems unrealistic that customers would shop using public transport. There is no requirement in national policy which dictates that an essential requirement to transfer bulky customer loads from store to car is pre-requisite for retail development outside of centres.

Reference to need should be deleted. The requirement to demonstrate a quantitative and qualitative need no longer forms one of the development management requirements for retail development in the NPPF. The 'need' test was abolished by PPS4 in 2009, which replaced it with an impact assessment. The NPPF retained the impact test for retail developments in out of centre locations and is concerned principally with development which may lead to a significant adverse impact on defined centres or planned or committed in-centre investment. As such, the policy does not accord with the NPPF.

We recommend that a reference to addressing impact is added, in order to be consistent with paragraph 26 of the NPPF.

Threshold for policy: The threshold for the policy is set at any proposal over 200 sq. M, which is just eight percent of the 2,500 sq. M threshold for impact assessments recommended at paragraph 26 of the NPPF. The same paragraph recommends that local planning authorities should set 'proportionate local thresholds' for assessments of impact. No justification for the 200 sq. M threshold is provided, which is unrealistically low in our view.

The latest Goad Plan of Carlisle City Centre, surveyed by Experian in April 2012, shows that the City Centre comprises 111,980 sq.m of Class A1 – A5 retail floorspace, with 87,400 sq.m of that floorspace being exclusively Class A1. The 200 sq.m threshold therefore makes up only 0.2% of the Class A1 floorspace and 0.1% of the overall retail floorspace in the City Centre.

The proposed threshold is therefore such an insignificant amount that a proposal of that scale could not possibly have a significant adverse impact on the City Centre. Requiring an assessment for such small scale proposals does not comply with Government's objectives to speed up the planning system and remove barriers to investment and growth as set out, for example, at paragraph 21 of the NPPF:

Response

The Plan includes an allocation at Morton for a foodstore, this is the only out of centre allocation currently in the Plan. The other sites identified as large store and retail warehouses are currently in this use therefore it would be unnecessary to allocate them for development.

The reference to criteria 1 and 3 being inconsistent is not strictly true. Apart from customers accessing the site there is also a need for workers to be able to access their place of work therefore a requirement for a range of sustainable transport options is appropriate. The NPPF states that local planning authorities should support a pattern of development which facilitates the use of sustainable modes of transport.

The impact threshold has been set in accordance with our evidence base the Carlisle Retail Study 2012 which recommends that the Council should adopt a local floorspace threshold of 200m2 for comparison and convenience retail.

Proposed Change

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

0440 Objection Policy 06

098 Sainsbury's Supermarkets Ltd A015

Detail
 Sainsbury's recommend that the criteria against which retail proposals on edge or out-of-centre sites will be determined should be amended to reflect national policy within the Framework.
 Paragraph 26 of the Framework confirms that impact assessments should include "assessment of"
 - the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made."

Response
 Sainsbury's also objects to the proposed threshold for impact assessments within the draft policy (200 sqm gross). This proposed threshold is well below the national threshold contained within the Framework (2,500 sqm) and the policy is not supported by sufficient evidence to justify such a threshold.

The wording in the policy reflects the NPPF in respect of the criteria against which retail proposals should be assessed. Whilst it does not fully duplicate the NPPF wording it is an accurate picture of what is required and reference is made to the NPPF and the relevant sections. Additional text has been added to the policy to refer to the impact assessment.

Proposed Change
 No change proposed as a result of this objection.

0580 Comment Policy 06

124 Ediston Properties/Whitbread Grou A020

Detail
 The policy confirms that retail proposals will not be permitted outside of the City Centre unless they are on sites allocated in the plan or unless a qualitative and quantitative need can be expressed for the proposals, no sequentially preferable sites exist and a number of strict criteria are satisfied.
 Whilst the representor accepts that this policy reflects guidance in NPPF and usual considerations that are applied to retail proposals in out-of-centre locations, there are instances where the Council will wish to support retail proposals in out-of-centre locations because of their potential to contribute towards the delivery of other plan objectives. For example, to complement another proposed and supportable development, to make a nonviable development viable, to assist in the delivery of regeneration objectives etc.
 To reflect this it is suggested that the following be added to the end of Policy 6:
 'Reflecting the fact that retail developments, including those in out-of-centre locations, have the potential to contribute towards the delivery of the plan vision, other plan objectives including regeneration objectives and can assist in making unviable developments which the Council supports viable, the Council will weigh factors of this nature in support of such proposals on a case by case basis and by reference to the merits of the proposals.'

Response
 Whilst the comments are noted it is not considered to be appropriate or necessary to include the additional criterion suggested in respect of out of centre locations. The policy is written in accordance with the NPPF and it is considered that proposals should be in accordance with this approach. Any proposals which are contrary to this would be treated on their own merits.

Proposed Change
 No change as a result of this objection.

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

0500	Objection	Policy	06	60
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 non-designated 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 omit any reference to the impact on the historic environment including heritage assets for development sites for retail development. Several suggested amendments given</p>			
Response	<p>The only retail site allocated, outside of the City Centre, is for the foodstore at the District centre at Morton a wider development area prosed for a significant amount of residential development alongside employment. Heritage matters have been looked at in detail as part of the planning applications which relate to the site.</p>			
Proposed Change	<p>No change proposed as a result of this objection.</p>			

0441	Support	Policy	07	
098		Sainsbury's Supermarkets Ltd	A015	
Detail	<p>Sainsbury's supports Policy 7, in particular the allocation of Stanwix Neighbourhood Shopping Parade.</p>			
Response	<p>Support noted.</p>			
Proposed Change	<p>N/A</p>			

0608	Objection	Policy	07	
128	Cllr John Mallinson	Carlisle City Conservative Group		
Detail	<p>This policy should require a degree of balance in the types of retail outlet permitted in a particular parade as a whole and not focus on one particular type of outlet.</p>			
Response	<p>Noted. The policy already allows for other small scale commercial uses within neighbourhood shopping parades where it can be demonstrated they are needed to support existing retail uses. It would not be appropriate for policy to interfere with market forces and make supporting uses on parades a requirement.</p>			
Proposed Change	<p>No change.</p>			

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

0995 Comment Policy **07**

194 Michael Barry Cumbria County Council

Detail Neighbourhood shopping parades have an important role in supporting communities and on that basis this policy is supported in principle. In addition to policy concerning the consideration of proposals at parades, the City Council would benefit from reviewing to the distribution of parades and consider options for further local retail provision across the City where there is considered to be a local deficiency.
Suggested change:
Through the ongoing development of the plan, consideration should be to the distribution of local retailing across the City and where a deficiency is identified, whether additional provision should be planned.

Response Support noted. A recent Retail Study did consider neighbourhood shopping parades and their function within their local context. It did not recommend that new ones were required. However, it may be appropriate for the policy to consider possible changes in need over the 15 year timescale of the Local Plan. Wording could be included to allow for new parades to be set up where need is identified.

Proposed Change Include wording in policy to allow for new shopping parades where need can be demonstrated.

0996 Support Policy **08**

194 Michael Barry Cumbria County Council

Detail It is noted that retailing at the Morton District Centre already benefits from planning permission so the provision of retail development here is considered appropriate.

Response Acknowledged.

Proposed Change N/A

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

0557 Objection Policy o8

120 Possfund Custodian Trustees Limit A019

Detail The reference to protecting all other committee or operations foodstores in the City should be removed, as it effectively seeks to protect all existing foodstores from competition, regardless of whether they are located in centres or outside of centres.

Response The Carlisle Retail Study considered the planning permission that was granted in 2010 within its study and concluded that the Council should retain the allocation of a district centre for Morton through the emerging Local Plan in order to provide sufficient policy protection to ensure that the foodstore anchor is delivered.

The Retail Study also recommended that there was no need for the Council to plan for new foodstore provision, taking into account the planning permission granted at Morton. Any additional foodstore proposals which are proposed, particularly to the south of the city, should be thoroughly assessed to ensure that the proposal does not undermine the delivery of the Morton store and its trading performance going forward.

However, the Retail Study does not state that the policy should restrict all potential retail development (so long as it doesn't affect the delivery of the anchor foodstore) and recommends that the Council should explore the potential to introduce a wider range of complementary retail and service uses as part of the Morton district centre scheme to meet the wider needs of existing and future residents - this is reflected in the Policy.

Proposed Change Amendment to policy to delete final sentence so that it is only relates to Morton

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

1130 Objection Policy 08

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail

Para 4.44. The justification for retaining Morton's District centre status is "to provide sufficient policy protection to ensure that the food store anchor is delivered." Para 4.45 "recognises that there is the potential to introduce wider range of comparison retail to meet the wider needs of existing and future residents" and Para 4.46 "A capacity assessment of current food store commitments across the city shows that there is no requirement for new convenience provision ---through to 2030" This appears to contradict Policy 55 Regeneration and Strategic Retail in the City Centre and Botchergate. "Carlisle City Centre will be the principle focus for high quality comparison retail-- -".

(Botchergate is outside the "Edge of centre" definition of 300m from the town centre" and as such is "Out of Centre")

At the 1996/97 public inquiry into the Local Plan, the Inspector considered a food store of 27,000 sq ft as appropriate to serve the Morton area plus a proposed housing development of a nominal 850 units. He also allowed the City Council's request for Morton to be classified as a District Centre. This ranks Morton on a par with the city centre in the sequential test with respect to retail development. At the time, the retail trade was buoyant and the Council's income from its significant interest in The Lanes had grown consistently over the years. The retail capacity study by the Council's consultants gave no indication of the impending nation wide collapse of city centre retail and the impact of internet shopping.

Planning permission has been granted for a 90,000sq.ft Superstore on the Morton site selling a wide range of goods and services, the year 2007 marked the bursting of the retail bubble, with the beginning of the recession and the inexorable growth of internet trading. Carlisle has not been immune from this. This is evident in the empty shops and charity shops in Carlisle and declining income from the city centre. There has also been a fundamental and strategic change away from the large Superstore format to neighbourhood convenience stores.

Morton's District Centre status, with its intention of a far wider offer than food, supported by free car parking, will further erode the viability of city centre retail and may well compromise its long term future. Unless the Council have entered into contractual arrangements with the purchaser of the site, and recognising the dramatic change in retail trading, the designation of Morton as a District Centre should be reviewed. Is Carlisle large enough to support two centres under these new trading conditions?

Response

Policy 8 fails to recognise the changed circumstances in retailing. Consideration should be given to rescinding the District centre status of the Morton site.

The Carlisle Retail Study considered the planning permission that was granted in 2010 within its study and concluded that the Council should retain the allocation of a district centre for Morton through the emerging Local Plan in order to provide sufficient policy protection to ensure that the foodstore anchor is delivered.

The Retail Study also recommended that there was no need for the Council to plan for new foodstore provision, taking into account the planning permission granted at Morton. Any additional foodstore proposals which are proposed, particularly to the south of the city, should be thoroughly assessed to ensure that the proposal does not undermine the delivery of the Morton store and its trading performance going forward.

However, the Retail Study does not state that the policy should restrict all potential retail development (so long as it doesn't affect the delivery of the anchor foodstore) and recommends that the Council should explore the potential to introduce a wider range of complementary retail and service uses as part of the Morton district centre scheme to meet the wider needs of existing and future residents - this is reflected in the Policy.

Proposed Change

Amendment to policy to delete final sentence so that it is only relates to Morton

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

0150 Support Policy **08**

062 Church Commissioners for England A013

Detail The Commissioners support the development of a foodstore at Morton District Centre and consider it as being complementary to the land within their ownership at South Morton that has committed approval for residential development (reference 09/0413).

Response Noted

Proposed Change No change to the Plan in response to this comment.

0933 Objection Policy **08**

005 Paul Barton Clerk to Dalston Parish Council

Detail Development should be restricted to the north of Peter Lane

Response The planning approval and master planning for the Morton development is currently contained north of Peter Lane. To restrict any further development to north of the road would not be in conformity with the NPPF and its positive approach to planning. There is no evidence to suggest that land south of the road is of particularly special or significant value that should be actively protected. Should an application for development come in for this land, it will be considered on its own merit.

Proposed Change No change.

0357 Support Policy **09**

088 Elizabeth Allnutt Save Our Streets

Detail There are a number of shop fronts in Rickergate. SOS would endorse this policy particularly where it touches on the heritage aspects of the other buildings in the neighbourhood which is in a conservation area.

Response Support noted.

Proposed Change No change

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0502	Comment	Policy 09	67	
104	Emily Hrycan	English Heritage North West		
Detail	<p>Criterion 3: We support the retention and enhancement of original shopfronts and those in the Botchergate Conservation Area being in line with the Management Plan. This is not included in the evidence base. (Although the Botchergate Conservation Area is not described in the Plan as of importance, given its location in the City of Carlisle, it is vital that it is recognised in the Plan as contributing to the character of the City.</p> <p>Para 4.49 - 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 1994</p> <p>Para 4.50 - The character referred to here has not been described within the Plan. This paragraph emphasises that the town needs considerable investment suggesting that the Botchergate Conservation Area is of a poor quality but this has not been identified in the Plan. The Plan should be expanded to identify issues and opportunities with regards the historic environment in the District and in particular the City of Carlisle.</p>			
Response	<p>Criterion 3: Noted - The Botchergate Conservation Area Management Plan did form part of the evidence base for the plan, and is available to view online. Better links from the Evidence Base page to the management plan could be included online however.</p> <p>Para 4.49 - Noted. The Council is considering an update to the 1994 SPG, however it is not considered critical as the guidance contained within it is still current and appropriate. The Shop Front policy can refer to it for the time being.</p>			
Proposed Change	<p>Link to Botchergate Conservation Area Management Plan from the Local Plan Evidence Base page online.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0501	Objection	Policy	09	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; this includes improving the standard of design in new developments.</p> <p>The consultation responses on the Core Strategy Issues and Options, outlined in the Plan mention the “need to protect and preserve historic and well designed aspects of the townscape, which would include consideration of the design of shopfronts within town centres”.</p> <p>As shown on the policy maps a few of the main shopping areas in the District of Carlisle are within conservation areas therefore, there will be a need to identify these areas within the Plan, including possibly an assessment/ description of their character, (this can also be through Conservation Area Appraisals and Management Plans). Shop fronts make a significant contribution to the historic environment, therefore it is important that they respond to the historic character of the area.</p> <p>Suggest: The Plan should be expanded to include a description of the historic retail environment in City of Carlisle and some of the main market towns and an assessment be made of their character and heritage assets.</p>			
Response	<p>Noted. Descriptions of Conservation Areas will be included in Conservation Area Appraisals as and when they are completed. These appraisals will include an assessment of the Conservation Area's character and heritage assets. Conservation Area Appraisals will form part of the evidence base for the plan, as such it is considered that there is little merit in repeating detailed descriptions of them within the Plan.</p>			
Proposed Change	<p>No change.</p>			
0581	Objection	Policy	10	
124		Ediston Properties/Whitbread Grou	Ao2o	
Detail	<p>The policy does not appropriately reflect that other locations as opposed to just the City Centre and District Centre have to be regarded as appropriate for such uses if general plan objectives relating to creating sustainable patterns of development are to be delivered. For example, the district contains large areas/concentrations of employment uses which need to be served by food and drink uses otherwise those working there will need to travel some distance to access such facilities. This also applies to proposed new areas of housing, some of which are not well related to existing or proposed shopping centres.</p> <p>Accordingly, it is proposed that the policy be altered to make it more realistic and reflective of this point. Proposed changes are as follows:</p> <p>‘Policy 10 - Food and Drink</p> <p>The Council will aim to create a vibrant and viable food and drink sector within the City and other designated Centres and at locations which will assist in creating sustainable patterns of development and/or which have the potential to meet other plan objectives. Such proposals will be considered on a case by case basis and on their merits. Second paragraph and related criteria to be retained and final paragraph to be deleted.’</p>			
Response	<p>Noted - wider location criteria could be included in the policy to explore where food and drink uses would be appropriate and sustainable. However, the criteria within the policy are important for both developers and decision makers when assessing these kind of proposals. They should be retained.</p>			
Proposed Change	<p>Include reference to food and drink provision in less central areas such as employment centres or large housing estates.</p>			

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

0997 Comment Policy **10**

194 Michael Barry Cumbria County Council

Detail This policy details the policy to be used when considering food and drink proposals. Food and drink development have an important role in enhancing the offer within town centres, making them more attractive to communities and visitors alike. It is considered that during the development of policies for the City Centre, recognition should be given to the importance of food to the operation of Carlisle's economy.

Response Noted. Food is considered important to the operation of Carlisle's economy, hence it has been given a specific policy (Policy 10) detailing how food related development should be addressed through planning.

Proposed Change No change.

0785 Support Policy **10**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail I refer to our comments in policy 4 and 5
 4: City centre's have irrevocably changed and there is no point in trying to have a sentimental vision of the past. The local plan should be the starting point for a bold new world, helping to develop a unique vibrant community hub. The city centre should become the driving force behind economic recovery. The city centre can no longer be just a primary retail area, it needs to incorporate other uses such as, health, housing, arts, entertainment, business and office space developing day, evening and night time cultures where shopping is just part of the total plan. As it is written at the moment the local plan does not recognise this need for the more business like approach to the city centre. The local plan should be used to set an objective to repopulate the city centre as a bustling community hub encouraging the varied uses that are needed to develop this hub. Policies should be in place to encourage successful independent retailers into the city centre. Change of use policies should encourage wider uses that are needed to make the city centre more commercially successful. The local plan should encourage the development of a city centre business plan covering all aspects of city centre life, not just planning.
 5:Whilst supporting this policy we refer to our comments regarding the primary shopping area and the need for non-retail activities to be encouraged. Consideration should also be given to bars/restaurants on the Lowther Street/ Scotch Street frontage to help improve the vibrancy of the city centre.]

Response Noted. This issues are more suited to be picked up in reference to comments on policies 4 and 5. The food and drink policy already looks to establish a vibrant and viable food and drink sector within the city centre, it also recognises and recommends support of an informal, emerging restaurant and bar quarter within the City Centre as identified within the Retail Study.

Proposed Change No change.

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

0181 Support Policy 10

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail Points 5 and 6 – Chapter welcomes the imposition of opening hours and regard for the possible disturbance to residential areas. Many Cathedral Close residents and tenants rise early in order to begin the Cathedral day at 7.00am. They much appreciate the City’s evening offer of activities, services and live music, but are grateful for the clarity that currently exists about its duration.

Response Support noted

Proposed Change No change required

0208 Comment Policy 10

071 Andrew Hunton Cumbria Constabulary Community

Detail [also see rep 0207 S 5] The Council’s desire to encourage vibrancy and sustainability in this sector is acknowledged. However, there are implications to Cumbria Constabulary in policing the Night-time Economy. The Constabulary maintains minimum staffing (constables) levels throughout each 24 hour period. To accommodate the demands on police resources, staffing is doubled every Friday, (between 2100hrs and 0400hrs) and by a factor of 2 ½ on Saturday. The festive season places even greater demands on available resources. It can be demonstrated that the majority of alcohol-related crime and public disorder in the City, occurs in conjunction with Night-time Economy around Botchergate within these hours.

Experience in other Police Forces has shown that too many A4 and A5 premises concentrated in a small area will generate a disproportionate level of public disorder and alcohol-related crime. Ratios of Night-time Economy outlets exceeding 20%, compared to other retail outlets, have been found to produce this effect. Therefore, the Constabulary would support a policy that encourages a broader range of commercial activity around Botchergate and consideration of a ‘Saturation Policy’ that would place a limitation on the ratio of Night-time Economy establishments. A greater diversity of Uses would contribute to vibrancy and sustainability in this area and provide additional interest and appeal to this Conservation Area.

Response Noted. An anti-saturation policy was discussed with Councillors when preparing the plan. They however felt that it would be unreasonable and beyond the remit of the plan to restrict particular use-types in this area, particularly if the market for them is still strong. There was a concern that limiting the amount of evening economy uses within Botchergate would lead to a spreading of night spots, and the less desirable implications and problems which that brings, across the city as opposed to focusing them in a more manageable, contained area could create more problems than it would solve. A more flexible approach to development may be explored through retail and city centre policies however. The Council would welcome further discussion on this issue with the Constabulary.

Proposed Change This issue should be explored in more detail with the Constabulary before changes are made to policy.

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

0909 Comment Policy **10**

69

189 Mrs Janet Whitworth University of Cumbria

Detail We are supportive of the regeneration and development of Botchergate, especially further measures to better integrate and dissipate the social benefits generated by this currently tightly focused activity. The proximity to the University's Fusehill Street Campus is important, as is the contribution that the facilities make to the 'student experience' in Carlisle. Pubs, bars and nightclubs have a part to play, as does access to reasonably priced takeaways, cafes and restaurants. We are also keen to see reference to the provision of appropriate levels and locations for private student accommodation and access and signage to the University campus from the City Centre, as well as advertising (and from the perimeter of the City at key access points e.g. London Road etc.). [same comment to Policy S5 page 41 - Ref 0908]

Response Support for policy 10 noted.

Proposed Change No change to Policy 10

0340 Support Policy **11**

084 Richard Greenwood Cumbria Tourism

Detail an important policy for Carlisle and the rural areas with potential to attract new visitors. Support.

Response Support noted

Proposed Change N/a

0805 Comment Policy **11**

158/33 Mrs Julie Templeton

Detail Again the absence of the City Centre Masterplan makes it difficult to comment on this policy. I would like development to make use of existing buildings if possible.

Response Noted. The City Centre Master plan is currently out for consultation. Updated policies will be consulted on in Spring 2014. An underlying principle of sustainable development is that existing/redundant buildings should be brought back into use where possible.

Proposed Change No change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0358	Support	Policy	11	
088	Elizabeth Allnutt	Save Our Streets		
Detail	The proposal to build a new Arts Centre in the Old Fire Station in Rickergate is largely welcomed by SOS. Since Rickergate is in a Conservation Area an additional clause should be inserted to the effect that any development should retain and enhance any existing historic buildings or street pattern.			
Response	Support noted. Suggested clause can be included.			
Proposed Change	Add suggested clause.			
0377	Objection	Policy	11	
089	Elizabeth Allnutt	National Allotments Society		
Detail	Allotments appear on the Policy Map as Land Allocated for Primary Leisure Use. This is not entirely appropriate. It is misleading and inconsistent – a new dedication all of their own or at least as Open Space would be more appropriate.			
	Suggest: Include all allotment sites on the Policy maps with a separate allocation reference.			
Response	Agreed. Allotments have been designated incorrectly on the policy map. A more appropriate designation would be Open Space, inline with how they are covered in policy.			
Proposed Change	Change Policy Map - create new designation for Open Space inline with Policy 65 to cover appropriate open spaces (allotments and amenity land)			
0716	Comment	Policy	11	
151/23	Mr Bob Sharples	Sport England		
Detail	Sport England support the principle of this policy, however concerning sports facilities there should be robust justification usually through a nationally recognised methodology such as the Planning Facilities Model for new facilities such as swimming pools artificial grass pitches, sports halls and indoor bowls. We would advise that the wording in paragraph 4.62: from Leisure development covered by this policy could include improvements to or the development of private outdoor facilities including... to Leisure development covered by this policy could include improvements to or the development of private outdoor facilities including... to.. That means that local authority and government leisure facilities will be treated the same as the private sector making the policy more equitable. We would like support paragraphs 4.63 and particular 4.64. Some sports require the natural environment and are not always easily accessible on walking and cycling routes.			
Response	Noted - reference to "private" can be deleted to make it clear that the policy applies to both private and public leisure development equally. Support noted.			
Proposed Change	Delete reference to "private" in paragraph 4.62			

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

0911 Comment Policy **11**

189 Mrs Janet Whitworth University of Cumbria

Detail
 The University is keen to continue to work in partnership with Carlisle City Council and relevant partners (e.g. Carlisle Leisure Ltd) to support the co-ordination, alignment and development of relevant leisure facilities across the city – to the benefit of the communities of Carlisle, and to students, so that we are able to offer high quality facilities, appropriately contributing to the student academic and welfare experience, and to specific programmes of learning (for example, in sport and performing arts). The University also hosts a number of conferences / visitor groups every Summer using our campus facilities and our on-site residential accommodation (for example, Fusehill Street has a 4 star visit Britain status). The University is able to support the development of our tourist and visitor offer by supporting and hosting specific events.

Response
 Support noted. The Council looks forward to working with the University to ensure an optimal leisure offer across the city.

Proposed Change
 No change.

0107 Objection Policy **11**

049 Mr D Nash

Detail
 Again statements of good intent, which could apply to any city nationwide, but following justification is bland and fails to show a positive commitment to developing a theatre or the wider arts, although the city wishes to be a tourist destination.

Response
 Noted. Issues surrounding tourist attractions/arts have been considered in Policy 12. Policy 12 is likely to be merged with policy 11 as it is logical to consider leisure uses and tourism under one heading.

Proposed Change
 Policy 11 to be merged with Policy 12.

0998 Comment Policy **11**

194 Michael Barry Cumbria County Council

Detail
 This policy contains the criteria against which new proposals for leisure development would be considered. While the principles expressed within the policy are considered appropriate, consistent with Paragraph 26 of the NPPF, the policy should be more explicit about the requirement for an impact assessment in the case of larger leisure developments on sites that are not in the “town centre”. The policy should also set out the scales of development beyond which such assessments are required.
 Suggested changes:
 - 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.
 - Point 5 of the policy should also be revised as follows: “appropriate car parking and satisfactory access are provided; and”

Response
 Noted. The Council has not set its own thresholds for triggering impact assessments, the default trigger presented within the NPPF would therefore be used.

Wording change to point 5 to require adequate parking provision is acceptable.

Proposed Change
 Update Point 5 to state parking should be provided rather than achieved.

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

0582 Comment Policy **11**

124 Ediston Properties/Whitbread Grou A020

Detail The justification for this policy needs to confirm whether the policy applies to hotel and/or just hotel related leisure facilities (see paragraph 4.62). Assuming it is confirmed that the policy does apply to hotels, the representor requests that the second criterion be altered to reflect the fact that development at non-city centre locations might assist in delivering other plan objectives. For this reason it is proposed to amend this criterion as follows: 'If the proposals affects land outside of the City or other designated centres, a sequential test has been applied and satisfied unless it is accepted that the proposals would assist in delivering other plan objectives.'

Response Noted and agreed. This policy should also apply to hotel/accommodation related leisure facilities. As such is proposed that this policy be merged with Policy 12 for Tourism related development. A more flexible approach will be required regarding sequential testing for tourist accommodation. It is agreed that if it can be demonstrated that there is a need for a hotel/motel/hostel to be located outside the city centre, if for example it is to support a rural tourist attraction, then the requirement for a sequential test may be waived.

Proposed Change Merge policy with Policy 12. Relax sequential test requirement for hotels and other accommodation related development when it can be demonstrated there is a need to locate it outside of the city centre.

0934 Support Policy **11**

005 Paul Barton Clerk to Dalston Parish Council

Detail We support this policy

Response Support noted

Proposed Change N/A

0341 Support Policy **12**

084 Richard Greenwood Cumbria Tourism

Detail Support. A broadly based policy which should assist both economic and physical regeneration. This could be supplemented with specific site based allocations for new hotels and attractions.

Response Comments noted. Specific allocations relating to this policy may be identified within the City Centre Masterplan. Planning permission for new hotels would be assessed using Policy 11 Leisure Development however it is considered that this Policy and Policy 11 will be merged.

Proposed Change The results of the City Centre masterplan will be used to inform City Centre Policies and as such wording may be added relating to site specific allocations.

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

0912 Comment Policy **12**

189 Mrs Janet Whitworth University of Cumbria

Detail

The University of Cumbria is supportive of the policy and the desire to develop the arts, cultural and tourism offer of the District. As per our response to Policy 11 [Ref 0911]: 'The University is keen to continue to work in partnership with Carlisle City Council and relevant partners (e.g. Carlisle Leisure Ltd) to support the co-ordination, alignment and development of relevant leisure facilities across the city – to the benefit of the communities of Carlisle, and to students, so that we are able to offer high quality facilities, contributing to the wider academic and cultural student experience, and to specific programmes of learning (for example, in sport and performing arts)'. In terms of cultural diversity, the University is currently developing its strategy and enhancing its ability to attract international students to the University, with view to growing the number of international students at all of its campuses, including Carlisle. Reference to cultural diversity and actions to encourage and support the communities of Carlisle to welcome international students would be welcomed. We are also keen to work with the City Council to promote the city and the wider region to our students, graduates, and their families, encouraging engagement with the visitor economy, whilst at the University, but also on leaving the University through our alumni. As earlier, we would also wish to continue our involvement in the range of discussions and proposals which focus specifically on Arts and Culture. The Arts are viewed by the University as a key mechanism for engaging with the local community and for raising aspirations. The Arts can make a key contribution to physical and mental health and well being, and to wealth generation; the development of key sites to provide a focus for Arts activities should be a principal goal for the University and the City working together, with the College.

Response Comments are noted. The City Council is committed to working closely with the University in relation to Arts and Culture and recognises the benefits that can be realised from this type of development and promotion, not only in terms of health and wellbeing but also in raising the profile of Carlisle and promoting the District to students, graduates and their families. This will help towards the University attracting an increasing number of international students.

Proposed Change This Policy will be merged with Policy 11 of the Draft Plan and suggestions made by the University will be incorporated to ensure that the Policy adequately covers the ambitions of the University in relation to the benefits of enhancing the Arts, Cultural and Tourism development of the District.

0182 Objection Policy **12**

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail

Chapter is disappointed that the Cathedral is mentioned neither in the consultation response nor in the Policy itself. Whilst it does not have World Heritage status it is nevertheless one of Carlisle's Grade 1 listed buildings and is a Scheduled Ancient Monument in its own right. If Carlisle is to be promoted in the same ways that York, Cambridge and Chester are, the Cathedral would wish to become a major partner in that promotion.

Response Comment noted and agree.

Proposed Change Reference has been made to the Cathedral in the Justification part of the Policy.

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

0999 Comment Policy **12**

194 Michael Barry Cumbria County Council

Detail The visitor economy is an important element of Cumbria’s economy and this policy, which supports the delivery of appropriate cultural schemes, is welcomed subject to the minor amendment set out below.
Suggested Changes:
 Point 3 should be revised as follows: “adequate access by a choice of means of transport, including sustainable modes of travel such as cycling or long distance walking, and appropriate car parking is provided;”

Response Comments are noted and will be added to the Policy.

Proposed Change Point 3 has been changed to read '3. adequate access by a choice of means of transport, including sustainable modes of travel such as cycling or long distance walking, and appropriate car parking is provided'.

0284 Support Policy **12**

077 Mr Alan Hubbard National Trust

Detail The general approach is noted and supported, especially in the context of the wider social and economic benefits of heritage-led tourism.

Response Comments noted.

Proposed Change No proposed change to Policy as comments are supportive.

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

0806 Support Policy 12

158/33 Mrs Julie Templeton

Detail
 The fire station in Rickergate is the proposed site for an Arts Centre. I support making use of this significant building. It is a central location and has easy access to transport. I believe that it will bring vitality to the town and bring people into the centre who will then go on to take advantage of restaurants, cafe's and nightclubs in the city centre. I also think that it will make economic sense to use the fire station as it is large enough to encompass many diverse uses and therefore not just rely on one source of income. The lead up to the pageant and the pageant itself showcased how it could draw in young people and be an asset to tourism. I believe that it fits in with item 4.6g - Tourism development will be considered favourably where it will assist in the economic and physical regeneration of an area and be of benefit to the local community. Opportunities should be taken for tourism development to promote the distinctive environment, culture and history of the area as a tourist attraction. The Old Fire Station/Police Station, Magistrates Court and the houses in Warwick Street together with the Victorian terraces in Corporation Road are all part of the heritage of Carlisle. I welcome this building being put to use to support the Arts, Tourism and Culture offer for Carlisle.

Response
 Comments are noted. There has been a long history of exploring the idea of a mid-scale arts centre and performance venue in Carlisle. The Carlisle Plan (Community Plan) provides a commitment for the development of an Arts centre within the city. Its Vision is to 'promote Carlisle as a prosperous City, one in which we can be proud'. To help achieve this it commits to 'develop vibrant sports, arts and cultural facilities, showcasing the City of Carlisle'. As such planning permission is currently being sought by the City Council for temporary change of use of the former Fire Station on Warwick Street, Rickergate to a 'Temporary Pilot Arts Programme'. The planning application is currently being considered however if approved, consent would be given up to 30th May 2014. During this time the Council will be testing how well the building works for this type of use and will be putting together a business case for its permanent change of use which may include a performance space, workshop, gallery and cafe.

Proposed Change
 The commitment for the development of an arts centre within the City will be mentioned within the Policy. The old fire station may be referenced if this is confirmed as the location for such facility.

0935 Objection Policy 12

005 Paul Barton Clerk to Dalston Parish Council

Detail
 No mention of guest houses and B&B accommodation, both of which are much needed in Dalston.

Response
 Comments are noted. Applications for the development of hotels and related facilities would be determined using Policy 11 Leisure Development and Policy 12 - Tourism, Arts and Cultural Development however it is considered that it would be beneficial to merge Policy 11 and Policy 12 as the criteria requirements would be largely the same. This policy would be clear that it applies to hotels as well as the development of other facilities which would further support the tourism offer of the whole District. Additionally not all B&B's will require planning permission (unless over 50% of the total number of bedrooms within a property would be reserved for this use).

Proposed Change
 Policies 11 and 12 will be merged to and will include reference, and support of the development of hotel and B&B accommodation within the District.

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

0169 Objection Policy 12

063 Ms Rose Freeman The Theatre Trust

Detail
 We object to the wording of this policy as it does not reflect the National Planning Policy Framework (NPPF) which states at item 70 that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community. The policy does not make it clear that existing facilities will be safeguarded and enhanced. Paragraph 4.70 states that the council 'recognises the value of these sectors and actively seeks to promote arts, culture and tourism'. But, for sustainability, this sector can only be developed by expanding existing or building new. Item 4 of the policy seems to only refer to the landscape not arts facilities/buildings.

Response
 We suggest item 4 of Policy 12 be expanded to promote and protect your existing established arts and cultural facilities as without such a policy it could become difficult to retain an essential arts/cultural asset particularly where land values become higher for an alternative use. This policy should state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community. The local community should also be given adequate opportunity to manage the asset.

Proposed Change
 Comments noted and agreed that the Policy should mention the need to safeguard against the unnecessary loss of valued facilities. In relation to the comment about the local community being given adequate opportunity to manage the asset, this is not something that Planning Policy can insist, however related to this is the Community Asset Register. Assets listed by the local community on the Community Asset Register ensure that in the event of a proposed sale or change of use, a process will be triggered that allows a community interest group to express an interest in bidding to purchase the property. This list is held by the City Council.

The following has been added into the Policy Justification "loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community".

0583 Comment Policy 12

124 Ediston Properties/Whitbread Grou A020

Detail
 The representor generally supports this policy but recommends that the policy makes it clear that tourism development extends to include accommodation for tourists. Indeed, the local tourism industry cannot survive and will never thrive unless visitors are provided with a choice of good quality and available and affordable accommodation in locations within and around the City Centre including locations close/adjacent to the national and primary route network.

Response
 Comments are noted. Applications for the development of hotels and related facilities would be determined using Policy 11 Leisure Development of the draft Plan however it is considered that it would be beneficial to merge Policy 11 and Policy 12 as the criteria requirements would be largely the same. This policy will be combined with the arts and culture policy and as such it will be clear that it applies to hotels as well as the development of other facilities which would further support the tourism offer of the District.

Proposed Change
 Policy 11 and 12 will be merged and reference will be made to enhancing the accommodation offer for tourists across the District.

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

0561 Objection Policy 12

121 Mike Fox Brampton Economic Partnership

Detail
 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.
 [Comment supported by Burtholme Parish Council]

Response
 Comments are noted, the Policy justification will be amended to include reference to the environment and the opportunities within the District for recreation and relaxation in line with the Green Infrastructure Policy.

Proposed Change
 Comments are noted, the Policy justification has been updated to include reference to the environment and the opportunities within the District for recreation and relaxation in line with the Green Infrastructure Policy.

0453 Support Policy 12

102 Dr Kate Willshaw Friends of the Lake District

Detail
 Friends of the Lake District supports this policy as it specifically states that proposals will be supported only where criteria which protect the natural environment are met. This is a strong policy which means that the high quality landscapes and natural environment of the District (one of the major reasons why tourists visit) will be maintained.

Response
 Comments noted and agree.

Proposed Change
 No proposed change as comments are supportive.

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

0633 Objection Policy 12

133/5 Ms Eileen Norman

Detail The section of the plan headed 'Arts, Culture & Tourism seems weak. Tourism is fairly well covered but Arts & Culture only seem to feature in the context of being considered good for tourism. There is an important point here, which is that the Arts & Culture offering of the district - say a theatre or art gallery - should clearly be for the benefit of the people of the district as well as tourism. There is no mention of an 'Arts Centre' for the district - a place where people can participate in the arts (music, drama, visual arts etc) as well as being audience for them. There has been much talk recently of trying to set up such a centre in the city and it would be interesting to know how supportive the City Council is of this, and for it to be included in some way in this plan. Also, there is a growing centre for the arts at The Hut (Brampton Community Centre) which would benefit from support and encouragement. This area of north-east Cumbria is an absolute hotbed of artists and craftspeople so there is an existing strong culture. The local authority would do well to acknowledge this, encourage it. consult with people and may then be able to capitalise on the expertise available.

To include more on Arts & Culture as stated in box 123

Response Comments are noted. It is recognised that the arts, culture and tourism development of the District is not just for visitors and is also for residents. Reference will be made within the justification of the Policy that the Council is supportive of the development of an arts centre within the City. The use of the Old Fire Station for this remains a proposal at this time however reference may be made to this within the justification. Mention will also be given to the existing strong culture of artists and craftspeople across the District.

Proposed Change Reference has been made within the justification of the Policy that the Council is supportive of the development of an arts centre within the City, for residents and visitors alike. The use of the Old Fire Station for this remains a proposal at this time however reference may be made to this within the justification. Mention will also be given to the existing strong culture of artists and craftspeople across the District.

0679 Objection Policy 12

146/18 Mr Ian Brodie The Ramblers

Detail The Policy recognises the important of Hadrian's Wall WHS as part of the green infrastructure but fails to give recognition of the English Coastal Route, the delivery of which is Government Policy. The future development of this trail through Carlisle LP area (as with the existing Pennine Way and Cumbria Coastal Way) is an important part of the areas green infrastructure and appropriate protection of the potential route should be made. Any developments which infringe on the route should be examined for potential planning gain which may facilitate the route.

The policy should recognise the government policy on the English Coastal Route and offer it appropriate protection.

Response Reference will be added to Policy 12 to mention the English Coastal Path however it is considered that the comment largely relates to Green Infrastructure and the protection of the route and as such this will be considered further under Policy 66 Public Rights of Way.

Proposed Change Reference has been added to the tourism, arts, cultural and leisure development Policy 12 to mention the English Coastal Path.

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

0359 Support Policy 12

088 Elizabeth Allnutt Save Our Streets

Detail Rickergate is the proposed location of a new Arts Centre and is also an area of distinctive buildings which contribute to the heritage and character of the City. The Rickergate community endorses policies which support the retention and celebration of the history and distinctiveness of the neighbourhood. SOS notes that there is an underlying presupposition here that historic buildings of local significance, art and culture are only of value where they can support the economy of the area. There needs to be a corrective here that historic buildings are valued in their own right as part of the heritage and distinctive character of Carlisle. The Old Fire Station/Police Station/Magistrates Court, houses in Warwick St and the distinctive Victorian terraces in Corporation Road and Peter Street would all be gone by now if the proposals of Carlisle Renaissance, made in the interests of the local economy, had been followed through.

Response Comments are noted. The proposed use of the Old Fire Station as an Arts Centre will be mentioned within the Justification. The importance of Rickergate in terms of its history and distinctiveness of the neighbourhood will be protected through other Policies within this Plan, including Policy 6o Conservation Areas. Policy 59 Local Listings will also help to ensure that historic buildings are valued in their own right as part of the heritage and distinctive character of Carlisle.

Proposed Change The proposed use of the Old Fire Station as an Arts Centre will be mentioned within the Justification.

0786 Support Policy 12

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Comment of support noted.

Proposed Change No proposed change in response to this comment.

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

0503	Objection	Policy	12	75
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.</p> <p>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.</p> <p>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. Reference is also made to a "historic quarter" yet these are not identified in the Plan or within the Tourism Policy. There is also a tourism strategy for Cumbria, which the Plan does not make reference to, nor is it included in the evidence base.</p>			
Response	<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. 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> <p>Comments are noted. It is considered that the Policy does recognise the importance of the historic environment in building a strong and competitive economy to some extent with the recognition of the importance of Hadrian's Wall World Heritage Site (WHS). The Policy justification also states that Carlisle's heritage is central to its attractiveness as a tourist location. The importance of the historic environment will however be emphasised more, linked with the assessment of the historic environment in Carlisle. This is mentioned within the Spatial Portrait at the start of the Plan however features specific to Carlisle District will be added to the justification of the Policy, including Carlisle Castle, Tullie House Museum, Carlisle Cathedral precinct, the City Walls, the Courts, the Market Cross, the Old Town Hall and Guildhall.</p>			
Proposed Change	<p>Comments are noted in terms of reference to websites promoting the tourist offer of the District and the tourism strategy for Cumbria.</p> <p>Further reference will be made within this Policy to the importance of the historic environment in building a strong and competitive economy, with additional historical and tourist attractions mentioned within the justification to the Policy.</p> <p>Reference has been made to the Tourism Strategy For Cumbria 'Making the Dream a Reality' (2008-2018) (and any successor/supporting strategies) within the evidence base.</p>			

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

1000 Comment Policy **13**

194 Michael Barry Cumbria County Council

Detail Such sites can play an important role in developing the visitor economy. Subject to the minor amendment set out below, the proposed policy approach which sets out how, camping caravan and chalet sites should be considered is welcome.
Suggested Changes:
Point 4 should be revised as follows: "Adequate access and appropriate car parking are provided; and"

Response Comments are noted.

Proposed Change Policy has been amended as a result of these comments and now reads '4. Adequate access and appropriate car parking can be are provided;'

0936 Comment Policy **13**

005 Paul Barton Clerk to Dalston Parish Council

Detail Should be incorporated into Neighbourhood Plan for Dalston

Response Comments are noted however it is the Parish Council that are developing the Neighbourhood Plan for Dalston and as such the City Council cannot determine whether this is considered as part of the Neighbourhood Plan.

Proposed Change No proposed change to the Policy in response to this comment.

0285 Objection Policy **13**

077 Mr Alan Hubbard National Trust

Detail National Trust does not object to what is in the policy or its detailed wording, but does consider that its scope is too limited. In particular the criteria against which developments will be assessed make no particular mention of heritage impacts. This appears particularly odd given the acknowledgement of the direct relationship between caravanning, camping and chalets, and the World Heritage Site.

Add an additional criterion to the Policy (or supplement the first criterion) to make explicit reference to not having an unacceptable impact upon heritage assets or their settings.

Response Comments are noted and agree.

Proposed Change Criterion 1 has been amended as a result of these comments and now states '1. The sitting and scale of the proposal does not have an unacceptable adverse effect on the character of the local landscape and historic environment or its setting'.

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

0072 Support Policy **13**

034 Lucy Adamski Aoo8

Detail Explicit provision for the certainty of providing policy geared towards caravan, camping and chalet sites is considered to be extremely positive for the industry and will undoubtedly encourage inward investment and visitor spend to the borough's economy.

Response Comments in support of this Policy are noted.

Proposed Change No proposed change as a result of these comments.

0342 Support Policy **13**

o84 Richard Greenwood Cumbria Tourism

Detail Broad support. Could this also make it clear that the policy applies to site extensions and new on-site facilities

Response Comments are noted and agree.

Proposed Change The Policy text has been amended as a result of this Policy to read 'Proposals for the development of and extension to caravan, camping and chalet sites will be acceptable provided that:'

0343 Support Policy **14**

o84 Richard Greenwood Cumbria Tourism

Detail support

Response Comment noted.

Proposed Change No proposed change as a result of this comment of support.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0937	Objection	Policy	14	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	This should not exclude other rural diversification, particularly for B&B and small scale accommodation, such as guest house.			
Response	B&B accommodation and guest houses often do not require planning permission as provided that less than 50% of the total number of bedrooms are taken over by this use, this would be considered to be permitted development. This Policy does recognise within the justification that there are opportunities for reusing or adapting surplus existing rural land and buildings to a variety of uses, including guesthouses. Policy 12 Arts, Culture, Tourist and Leisure will also be used to determine applications for hotel accommodation.			
Proposed Change	No proposed change to this Policy as a result of these comments.			
1001	Objection	Policy	14	
194	Michael Barry	Cumbria County Council		
Detail	<p>The draft Local Plan sets out policy with respect to the consideration of economic development proposals in rural communities. The first criteria of this policy, gives the impression that only uses linked to the rural economy would be acceptable in rural areas. This is not understood to be the intention of this policy. It is therefore suggested that this policy should be clearer that small scale employment uses, which can help diversify the rural economy would be supported. The policy could also make further linkages to broadband highlighting its importance in facilitating the diversification of the rural economy. The criteria addressing access and parking should also be revised to ensure its robustness.</p> <p>Suggested Changes:</p> <ul style="list-style-type: none"> - It is suggested that the policy should clearly recognise the potential benefits of different forms of employment schemes in rural areas, as part of this It could also highlight the value of Live/Work development and small flexible work spaces in diversifying economic activities. It should also look to amplify the value of rural broadband in aiding economic development in rural areas. - Criteria 3 should be revised to state: "provide adequate access and parking arrangements;" 			
Response	Comments are noted and the Policy will be updated accordingly in relation to changes to the Policy criteria and the reference to broadband in potentially expanding the scope for rural business opportunities. However, it is not considered that a reference to live/work units is required as a part of this Policy. The current Carlisle District Local Plan 2001-2016 includes a Policy on such however it is now considered that the NPPF would allow this type of use in the rural area, thus removing the need for a Local Plan Policy as this would simply be repeating national planning guidance.			
Proposed Change	<p>As per these comments, the Policy has been amended as follows -</p> <p>Policy Criterion 1 has been amended to read 'Be compatible with the existing rural setting' instead of compatible with 'agricultural operations', in order to demonstrate that whilst new businesses do not necessarily have to be agricultural in nature, they should still be compatible with the rural area.</p> <p>Policy criterion 3 has been amended to read 'Provide adequate access and parking arrangements'.</p> <p>The Policy Justification has been updated to reference the opportunities arising from the wider roll out of rural broadband 'New employment opportunities may also be created within the rural area as the provision and availability of rural broadband spreads'.</p>			

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

0787 Comment Policy **14**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail General support but a more positive approach is needed to start up business in particular for young people living in the rural area and wanting to remain there.

Response Comments are noted and agreed. This Policy aims to allow business to be established in appropriate locations to serve the local community in rural areas.

Proposed Change No proposed change as a result of these comments.

0211 Objection Policy **14**

072 Miss Alice Unsworth NFU

Detail Re point 2- The NFU has a concern that limits upon size and compatibility may disadvantage the agricultural community, and we would wish for proposals for farm diversification to receive favourable consideration.
 Re points 3 & 4 - While paragraph 4.79 provides a positive future for agriculture, the NFU has concerns that such policies do not incur additional costs upon the project so that it becomes uneconomical, and contrary to NPPF guidance.

Response This point is intended to protect the agricultural community from proposals that would not be compatible with agricultural operations. It is not intended to make schemes unviable. The policy will be tested through the viability assessment of the whole plan to ensure this. Point 2 is useful to ensure that there would not be significant adverse landscape impacts as a result of the development, which is important regardless of the proposed use.

Proposed Change There are no proposed changes as a result of this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0264	Comment	Policy	14	
074	Tim Coombe	Sustainable Brampton		
Detail	<p>Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.</p> <p>Rural communities spend a higher proportion of their disposable incomes on transport than on either electricity or heat. Sustainable transport is acknowledged in Objective 11 of the SA to help promote healthier lifestyles but spiralling transport costs nationally are already significantly affecting the wider sustainability and economic resilience of those living in remote rural areas. Policies are urgently required to help reduce future transport costs in areas where limited or no public transport is ever likely to exist. Electric bikes and cars offer one potential solution for rural transport as does converting vehicles (even tractors) to use methane as a fuel (methane being an important by-product of an AD plant). Innovative thinking will be required to provide solutions that address these long term issues and their importance should be reflected in the priority given to the provision of a 21st Century transport infrastructure and non-fossil fuel based forms of transport in the Local Plan for rural areas.</p> <p>Community led renewable energy generation schemes are a highly attractive way of meeting wider sustainability targets whilst also promoting economic growth and providing social benefits. Brampton and Beyond Energy (BABE) is a good example of one such project which seeks to benefit from seed-corn investment by the Rural Community Energy Fund (RCEF) sponsored by the DECC and administered through the Waste and Resources Action Programme (WRAP). Investment advice will be provided through Rural Cumbria Connects (RCC), a group of independent advisors who are committed to resourcing and administering multiple community based renewable energy projects. [further comments made regarding aims and how further achievement could be attained]</p>			
Response	<p>Comments are noted in terms of reference to community resilience within the Plan. The Objective for the Climate Change and Flood Risk Chapter does state that it seeks to ensure that 'Carlisle is more resilient and less vulnerable to the impacts arising from climate change'. A number of comments here relate to sustainable transport. Policy 34 Sustainable Transport covers the use of alternative fuels and sustainable modes of transport. Additionally, opportunities for renewable energy generation will be supported through Policy 41 Renewable Energy.</p>			
Proposed Change	<p>There are no proposed changes to this Policy however the comments will be picked up within Policy 34 Sustainable Transport, Policy 41 Renewable Energy and throughout the introductory paragraphs.</p>			

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

0151 Support Policy **14**

062 Church Commissioners for England A013

Detail 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. We therefore support the inclusion of Policy 14 in the Local Plan, as it is considered that there is a need to strengthen the economy in rural areas by supporting the growth and expansion of all types of business and enterprise in rural area.

Response Comments are noted and agree.

Proposed Change In response to this comment Criterion 1 has been amended to cover the potential for other businesses, not only those related directly to agriculture to develop in the rural area however it still recognises that these uses must be well related to the rural area. Criterion 1 now states 'Proposals should: 1.Be compatible with the existing rural setting;'

0735 Comment Policy **14**

154/26/27 Mr Bryan Craig

Detail There is no mention of Guest House and B&B Accommodation other than under Rural Diversification in what is an important tourist location

Response B&B accommodation and guest houses often do not require planning permission as provided that less than 50% of the total number of bedrooms are taken over by this use, this would be considered to be permitted development. Additionally for applications that would require planning permission, they would be determined using an updated Policy 12 Arts, Culture, Tourism and Leisure, and this Policy.

Proposed Change This comment is noted and as such Policy 12 will be updated to include reference to hotel accommodation which will cover the whole District.

0011 Support Policy **14** 79 - 80

010 Richard Ritson Chair of Kingwater Parish Council

Detail Keeping People in the area especially young people. Local People like to use local businesses. Helps keep a mixed community.

Response Comments are noted and agreed. This Policy aims to allow business to be established in appropriate areas to serve the local community.

Proposed Change There is no proposed change as a result of these comments.

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

1002 Comment Policy **15**

194 Michael Barry Cumbria County Council

Detail Farm shops can contribute to the diversification of the rural economy. This policy contains criteria for their consideration and while fundamentally robust, it is suggested that the criteria concerning access should be revised to ensure its effectiveness.
Suggested Changes:
Criteria 6 to this policy should be revised to state: "highway safety will not be compromised and adequate access is provided"

Response After reviewing the Policies contained within the Plan, it is considered that the content of this Policy would be covered by Policy 14 Rural Diversification and as such Policy 15 - Farm Shops will be removed.

Proposed Change No proposed change as a result of these comments as it is proposed that this Policy will be removed from the Plan.

0938 Support Policy **15**

005 Paul Barton Clerk to Dalston Parish Council

Detail We support this policy

Response Comment of support are noted.

Proposed Change No proposed change to this Policy as a result of this comment.

0344 Support Policy **15**

084 Richard Greenwood Cumbria Tourism

Detail support

Response After reviewing the Policies contained within the Plan, it is considered that the content of this Policy would be covered by Policy 14 Rural Diversification and as such Policy 15 - Farm Shops will be removed.

Proposed Change No proposed change as a result of these comments as it is proposed that this Policy will be removed from the Plan.

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

0609 Comment Policy **15** 81

128 Cllr John Mallinson Carlisle City Conservative Group

Detail Recommend removing points 1 & 2.

Response After reviewing the Policies contained within the Plan, it is considered that the content of this Policy would be covered by Policy 14 Rural Diversification and as such Policy 15 - Farm Shops will be removed.

Proposed Change No proposed change as a result of these comments as it is proposed that this Policy will be removed from the Plan.

0012 Support Policy **15** 81 - 82

010 Richard Ritson Chair of Kingwater Parish Council

Detail Employment and Farm diversification opportunities.

Response After reviewing the Policies contained within the Plan, it is considered that the content of this Policy would be covered by Policy 14 Rural Diversification and as such Policy 15 - Farm Shops will be removed.

Proposed Change No proposed change as a result of these comments as it is proposed that this Policy will be removed from the Plan.

1003 Support Policy **16**

194 Michael Barry Cumbria County Council

Detail This policy concerning the delivery of agricultural buildings is supported.

Response Comments of support are noted.

Proposed Change There is no proposed change in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0939	Objection	Policy	16	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	This policy might be too restrictive for future agricultural needs and all developments need to be suitably landscaped.			
Response	Comments noted. It is not intended that the Policy will be too restrictive for agricultural needs, it is intended to protect the landscape from any development that may have an adverse effect in terms of positioning or scale. Criterion 1 of the Policy states that new buildings should take advantage of the contours of the land and any existing natural screening. This would therefore help to ensure that new development would be suitably landscaped where possible.			
Proposed Change	No proposed change as a result of this comment as it is considered that the Policy adequately covers these points.			
0152	Comment	Policy	16	
062		Church Commissioners for England	A013	
Detail	Policy 16 is considered acceptable, in principle; however, to ensure that the Policy is sound, it is considered that the policy should only refer to the agricultural buildings which would not be covered by permitted development rights as set out in the General Permitted Development Order (GPDO). Policy 16 should therefore be reworded to say "Proposals for new farm buildings and extensions to existing agricultural buildings or other structures which fall outside of the permitted development rights will be permitted provided that ...".			
Response	Comments are noted and agree.			
Proposed Change	The Policy has been amended as a result of these comments and now states - 'Proposals for new agricultural buildings and extensions to existing agricultural buildings or other structures which fall outside of Permitted Development rights will be permitted provided that;'.			
0212	Objection	Policy	16	
072	Miss Alice Unsworth	NFU		
Detail	While the NFU welcomes the reduction in the formal application submissions for certain scaled projects as mentioned in paragraph 4.88, we have concern that such policies do not put additional cost upon a project so that it becomes uneconomical. We would also require clarification as to what would be considered as an "unacceptable impact" in point 4.			
Response	Comments are noted. It is not the intention of the Policy for projects to incur additional costs, the criteria is instead useful to ensure that new buildings are sited in the most appropriate locations. This Policy will however be tested within the viability assessment for the whole Plan and as such if it is considered that this Policy could make a scheme unviable it will be amended.			
Proposed Change	In relation to criterion 4, it is important to have criteria to consider the impact that any development would have on adjacent properties. What is considered unacceptable varies in different circumstances and as such it is difficult to define be it relating to over dominance, scale or positioning. There is no proposed change as a result of this comment.			

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

0736 Comment Policy **16**

154/26/27 Mr Bryan Craig

Detail Item 2 is too restrictive and the use of 'scale and form' in relation to existing Farm Buildings may make planning decisions on large modern farm buildings difficult.

Response Comments are noted.

Proposed Change Policy criterion 2 has been amended to '2. The scale and form of the proposed building or structure relates to the existing group of farm buildings, unless otherwise justified;'. The addition of the second part of this criterion relating to 'unless otherwise justified' would allow for development to deviate away from this where there is reasoned justification.

0013 Support Policy **16** 83 - 84

010 Richard Ritson Chair of Kingwater Parish Council

Detail Need new building to expand the farm business and to keep it going. Old ones become unfit for purpose. Newer buildings are easier and quicker to manager e.g. These housing animals.

Response Comments are noted. This Policy would allow for the development of new farm buildings or replacement of considered no longer fit for purpose.

Proposed Change No proposed change in response to this comment.

0940 Support Policy **17**

005 Paul Barton Clerk to Dalston Parish Council

Detail Happy with this one.

Response Comments of support are noted.

Proposed Change There is no proposed change in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0865	Objection	Policy	17	
122	Bob Taylor	Taylor & Hardy		
Detail	I consider that the policy as proposed is more restrictive than the NPPF approach. Para 28 of the NPPF makes clear that all types of rural business should be supported both through conversion and by new build. The additional criterion 2 requiring that an existing building be used where possible and especially that any new building should be within or adjacent to an existing building or group is too prescriptive and reduces flexibility. If free standing new buildings were proposed they would still need to satisfy the landscape impact test in criterion 1. I would welcome a discussion on this issue.			
Response	Comments are noted and agree. The Policy will be amended to remove this criterion.			
Proposed Change	Following the consultation this Policy has been amended and some of the criteria removed/merged. Criteria 2 'The scheme reuses an existing building(s) where possible and any associated new build, where necessary and appropriate, should be located within or adjacent to an existing building or group of buildings' has been removed.			
1004	Comment	Policy	17	
194	Michael Barry	Cumbria County Council		
Detail	Subject to the minor amendment, this policy, which addresses the delivery of buildings and uses linked to equestrian activity, is considered appropriate. Suggested Changes: Criteria 2 to this policy should be revised to state: "adequate access arrangements and car parking are provided;"			
Response	Comments are noted.			
Proposed Change	Criteria 2 of the Policy has been updated to state 'Adequate access arrangements and car parking are provided'.			
0073	Support	Policy	17	
034	Lucy Adamski			A008
Detail	Equestrian development is a significant component of recreational activities and it is considered extremely proactive to incorporate a policy of this nature into the Plan so as to provide appropriate guidance and, subject to location, scale and design, an appropriate degree of certainty.			
Response	Comments of support are noted.			
Proposed Change	No proposed change in response to this comment.			

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

0717 Support Policy **17**

151/23 Mr Bob Sharples Sport England

Detail Sport England supports the thrust of this policy but advise that in order to make stronger, any application for new stables/facilities should comply with the good practise guidance set out by the British Equestrian Federation www.bef.co.uk. And any major facilities development should be supported by the BEF and have a robust business plan/sports development plan. Equestrian developments can assist local economies by creating both direct and in-direct employment, which are important in rural areas. However, it is important that proposals receiving planning permission are finically sustainable and are needed.

Response Comments are noted however it is considered that in order to grant planning permission a scheme must be in line with the criteria outlined within the Policy, not necessarily the British Equestrian Guidance. Whilst it is important that proposals are financially sustainable, this is not something that the planning process would ensure, this is something that the applicant would need to consider before investing in this type of development.

Proposed Change The Policy Justification has been updated to include reference to the British Equestrian Federation - 'Supporting information and good practice guidance for this type of development is available from the British Equestrian Federation which is the national governing body for horse sports in the UK (www.bef.co.uk)'.

0014 Support Policy **17** 85 - 86

010 Richard Ritson Chair of Kingwater Parish Council

Detail Employment oppotunities and oppotunities for their sons and daughters to set up their own business,

Response Comments are noted.

Proposed Change No proposed change in response to this comment.

0360 Support Policy **18**

o88 Elizabeth Allnutt Save Our Streets

Detail The Rickergate community, as part of a Conservation Area, endorses this policy

Response Support Noted - this policy is going to be to deleted however as it is adequately covered by national policy and by regulations.

Proposed Change Delete Policy 18.

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

0853 Comment Policy **18**

173 Cllr Bloxham

Detail Should have something to do with the proliferation of signs for advertising .

Response Agreed. The advertisement policy will be deleted, however words to address the over proliferation of signs and adverts will be included in the Design policy.

Proposed Change Delete policy 18. Add wording to Design policy to address over proliferation/over-cluttering of signs and adverts.

0807 Support Policy **18**

158/33 Mrs Julie Templeton

Detail I support the need to have some control on the amount of outdoor advertisements on display especially within conservation areas.

Response Support Noted - this policy is going to be to deleted however as it is adequately covered by national policy and by regulations.

Proposed Change Delete Policy 18.

0286 Comment Policy **18**

077 Mr Alan Hubbard National Trust

Detail It is the Trust's understanding that the definition of "amenity" in regulation 2(1) of the Advertisement Regulations includes both visual and aural amenity. In this context a minor re-wording of the first sentence of the policy would appear to be warranted.

Include a reference to aural as well as visual amenity in the first sentence of the policy.

Response Agreed - however this policy is to be deleted. It is considered that the Advertisement Regulations and the NPPF are sufficient to cover guidance on the lay out and design of adverts.

Proposed Change Delete policy 18.

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

0864 Comment Policy **18**

174/48/49 Mrs Olwyn Luckley

Detail MY COMMENT IS IN REGARD TO ADVERTISEMENTS ON LISTED BUILDINGS. CLEARER AND PLAINER CONDITIONS COULD BE ADDED SUCH AS: PERMISSION WOULD ONLY BE PERMITTED IF THE SCALE, MATERIALS, COLOUR, DETAILING AND NUMBER OF SIGNS ARE SYMPATHETIC TO THE CHARACTER OF THE LISTED BUILDING THE SIGNS DO NOT DETRACT FROM OR CONCEAL ANY SIGNIFICANT ARCHITECTURAL FEATURE. THE SIGNS ARE NOT INTERNALLY ILLUMINATED.

Response Noted. Policy 18 will be deleted however as it is considered that the NPPF and the Advertisement Regulations cover planning issues arising from signs and adverts adequately. The issues raised in this comment are also addressed within the regulations.

Proposed Change Delete Policy 18.

0010 Comment Policy **18** 4.101 - 3 87-88

009 Outdoor Media Centre A002

Detail Overall the general thrust of the policy & the means by which control over outdoor advertising is proposed is sound. Support the criteria of the policy. As we consider that the 2nd sentence "Proposals which are of an inappropriate scale..." read together with the criteria of the Policy are sufficient to ensure that advertisements are designed to respect heritage assets. Suggest 1st sentence of Policy 18 ("Proposals for the display of advertisements within the conservation areas..." be deleted together with the final sentence in paragraph 4.102 " The council will require evidence..".

Last Paragraph Policy 18, re special considerations for ASCAs - when did the council last review its ASCAs. Was it within the last 5 yrs as required by Regulation 20(5). If not how can you justify stricter control. Perhaps the Policy should place an onus on the Council to review the ASCA as required by law. Do not understand sub-paragraph 3 perhaps it should be deleted or at least '@townscape' explained.

Paragraph 4.101 is inaccurate. The act is not defined. Suggest wording: "For the purpose of the law, "advertisement" has a wide definition. It would for instance, include...". We also suggest (for the avoidance of doubt) the "balloons" be expanded to "tethered advertising balloons"

Paragraph 4.103 is entirely untrue and must be deleted.

Paragraph 4.104, 3rd sentence mixes fact and opinion. Reg 21 restricts the range & type of advertisements which may be displayed within ASCA, but does not specify design, materials or illumination. This sentence should be subdivided to state the law separately from those aspects which the Council consider relevant as a matter of policy.

Response On advice from the Planning Inspectorate this policy will be removed from the Plan. The control of advertisements is covered by the Town and Country Planning (Control of Advertisements) (England) Regulations (2007) and as such there is no need to duplicate this in planning policy. Issues to do with design/highway safety are covered adequately within other policies within the Plan.

Proposed Change Policy will be deleted.

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

0009 Comment Policy **18** 4.101 - 3 87-88

008 British Sign & Graphics Association A002

Detail

Overall the general thrust of the policy & the means by which control over outdoor advertising is proposed is sound. Support the criteria of the policy. As we consider that the 2nd sentence "Proposals which are of an inappropriate scale..." read together with the criteria of the Policy are sufficient to ensure that advertisements are designed to respect heritage assets. Suggest 1st sentence of Policy 18 ("Proposals for the display of advertisements within the conservation areas..." be deleted together with the final sentence in paragraph 4.102 "The council will require evidence..".

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Proposed Change Policy will be deleted.

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

0584 Comment Policy **New**

124 Ediston Properties/Whitbread Grou A020

Detail

The representation is surprised that although the plan's policy map shows an allocation for mixed use developments, there does not appear to be an appropriate policy which links to it in so far as sites/land outside of the City Centre is concerned.

Given that there are likely to be a number of sites like the site adjacent Junction 44 of the M6 with A7/Kingstown Road, Kingstown, Carlisle, which is controlled by Whitbread Group Plc and in use as Premier Inn, which are known to either be being considered for redevelopment for mixed use developments or are suitable for such an initiative in future, it is appropriate that the plan includes a new policy to this effect.

The representation considers that the subject site should be allocated as a site/land that is suitable for redevelopment for mixed uses. As each site that is designated under this policy offers the potential for a different mix of uses/ developments it is proposed that the policy links to a schedule of all sites duly allocated which sets out what each site is considered suitable for and what criteria need to be satisfied before planning permission will be granted. A suggested form of words for the policy and schedule in so far as it relates to the subject site is as follows:

'Policy **** - Mixed Use Development Sites (Suggested New Policy)

Sites allocated as mixed use development sites are considered suitable for redevelopment for mixed use developments. The appropriate mix of uses each site is considered suitable for and relevant site related criteria against which future redevelopment proposals will be tested is set out in the schedule forming part of Appendix ** of the local plan. In all cases proposed developments should:

- satisfy other relevant plan policies;
- be accessible;
- be of a high quality of design;
- cause no unacceptable impacts on the City or other centres;
- cause no unacceptable environmental impacts;
- have acceptable transportation arrangements; and
- be compatible with and cause no unacceptable impacts on adjoining uses.

Schedule of Sites to Which Policy ** - Mixed Use Developments Applies:

Site ** - Budget hotel/land adjacent to Junction 44 of M6 with A7/Kingstown Road, Kingstown, Carlisle

This is considered suitable for redevelopment for all or a mix of hotel/budget hotel, complementary food and drink use/s, and retailing plus ancillary car parking.

Development proposals must satisfy the following criteria in addition to those forming part of the main policy:

- Demonstration that no sequentially superior sites exist in the City or other centres.
- Occupation of retail units is restricted, i.e., they cannot be used for unrestricted Class A1 Retail use.
- Retail uses cannot exceed 4,000 sq m gross floorspace.
- Retail floorspace can be subdivided but into no less than 4 retail units.
- The retail uses should cause no unacceptable impacts on the City or other designated centres.
- Car parking to be provided in line with local plan standards.
- Traffic generation and related impacts to be demonstrated to be within acceptable levels.
- Measures to be included which encourage access by public transport.'

Response

This site has not been given a designation in terms of land use as it was not envisaged that any change to take place. Any proposals that do come forward will be treated on their own merits. Should more detail be provided as to potential development options for the sites these can be considered as part of the next round of public consultation.

Proposed Change

No change proposed as a result of this objection

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

1108	Comment	Policy Overview		
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>The identified sites for development are the usual suspects; where there is an absence is that of any focus for investment into Carlisle, based on what it can offer, skills etc; what it can achieve and has done so; living environment and access to adjacent regions.</p> <p>The designation of Harker is strange, as is the rationale for its inclusion.</p> <p>The airfield site designation carries some very ambivalent statements and no definition of what may be airfield related and no evidence of any airfield master plan.</p> <p>On central Carlisle it is important to retain the centre of Carlisle as a vibrant commercial area, though there is little evidence of how this might be successfully achieved, particularly in supporting and having strategies to ensure that premises remain occupied.</p> <p>On tourism, great play is rightly made of the narrow Carlisle offer and how this can be enhanced. What is lacking is the active promotion/coordination and integration of the equally valuable surrounding natural environmental and heritage offerings.</p>			
Response	<p>The Harker allocation relates specifically to a type of user that has demonstrated a need for a location adjacent to a high voltage electricity supply. This is a low trip generating user.</p> <p>Reference to airport related development allows for a degree of flexibility whilst ensuring that development contributes to the delivery of an airport.</p> <p>The city centre related policies along with other policies within the plan will seek to maintain the vitality and viability of the city centre through creating the right conditions and providing the flexibility to allow and encourage occupation of premises with appropriate uses that will contribute positively to the success of the City Centre.</p> <p>The Spatial portrait and Plan objectives highlight and promote the value of the District's natural environment and heritage assets.</p>			
Proposed Change	No change required as a result of this objection.			

RepNo	Status	Paragraph	Page	Map
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Consultee Ref No	Consultees.Contact	Organisation	Agent
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REPRESENTATIONS

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

Chapter 05

o895 Comment Policy

187 Ken Hind Clerk to Kingmoor Parish Council

Detail When a development is of a size that it needs a period of public consultation, more emphasis should be placed on the response of the consultees be that of the general public, local residents or parish council. At the moment the period of consultation is used by a large developer to provide information of what they intend to build. The developer will have spent a large amount of money to produce these plans maybe some sort of limited consultation should happen before plans are drawn up as any developer is reluctant to change them once they have been paid for. Consultation is only good if it works both ways. Valid points need to be answered. Valid points made by consultees should be looked at by someone independent.

Response The NPPF para 66 states, "applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably". All planning applications have a period of public consultation, irrespective of size. Valid points are answered in the case officer's report. The Council does not have the resources to independently assess comments made as a result of consultation on a planning application. Occasionally responses of a technical nature are subject to independent scrutiny. The Local Plan will ultimately be subject to an Examination in Public held by a planning inspector. This is the last stage of the process, and will consist of a series of hearings on matters of the Plan.

Proposed Change No change to the Local Plan in response to this comment.

o888 Comment Policy

186 Ken Hind Clerk to Kirkandrews on Esk Parish

Detail There is a need for small scale affordable housing in small hamlets.

Response Policy 23 - Rural Exceptions Sites makes provision for small scale affordable housing in small hamlets.

Proposed Change No change to the Plan in response to this comment.

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

0318 Comment Policy

079 David Basden

Detail

I wish to comment on the new Carlisle Local Plan which I have read in Carlisle Public Library. The scope and detail of the Plan are impressive, but apart from expressing my general approval that the City Council is showing determination for advancing and improving the City in the next decades I wish only to comment on housing policy. I request that our Planners and Councillors look carefully at the growing demand for self-build housing, undertaken on a one-off or small collective scale. In particular I ask the City to look at making small areas of land available as building plots for individual home builders with the requisite planning permissions. This could possibly be on City owned land. Other towns and cities in England have made land and planning available for this need - Milton Keynes is an example. I would stress there is a large and growing interest in building homes the way that it is done in Europe - that is by individuals having one-off houses built by small house building companies. Such homes are of quality design and construction; in many cases better than that found in the large English spec.-built estates. It is land availability and planning policy that is making for difficulties for the individual wishing to build. I note that Carlisle has signed the Nottingham Declaration of 2007 on climate change. I submit that it is individual housebuilders who construct in excess of minimum building regulations, thus achieving a "greener" house and thereby reducing CO2 emissions to below that required by current regulations

Response

Low cost land is rare. The average open market cost of a selfbuild plot in the UK is over £200,000. The City Council sells surplus land at market price. Estate Agents and Land Agents can provide advice about finding land. Affordable selfbuild projects can be based on less expensive land, the kind that is usually developed under the exceptions planning policy to provide affordable housing for local people. Organisations such as community land trusts and CRHT may be able to help selfbuild groups with proposals to build on land that can only be developed under the rural exceptions sites policy. Self build is one of many ways of delivering open market or affordable housing.

Proposed Change

No change to policy in response to this comment.

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

0896 Comment Policy

188 Mrs Alison Riddell Clerk to Brampton Parish Council

Detail
 The PC is in favour of limited growth for Brampton providing that the issue of sustainability is addressed concurrently. If this Plan goes ahead as it is and concerns regarding sustainability are not tackled, the PC is concerned that Brampton will become a dormitory town. The general infrastructure of the town at present would not cope with the extra proposed housing, the level of development is too high. A better balance needs to be drawn which encourages growth but allows sustainability. There should be improved consultation at local level on large developments.
 The proposed density of housing is such that Brampton will not be able to support schools, doctors etc. Has any consideration been given to site in other areas such as Longtown, Cumwhinton, Scotby etc that will also affect the schools and doctors in Brampton. You have already highlighted concerns in the Plan regarding this under Policy 47.
 This matter needs addressed urgently.

Response
 Brampton is the second largest settlement in the District, and has a population of 4000. It also has the second largest range of services and facilities outside Carlisle. Brampton has both primary and secondary schools, a range of local shops, banks, estate agents, other businesses and community facilities including an expanding doctors' surgery, cottage hospital and library. There is also a train station nearby. Brampton has good road links to Carlisle and Newcastle, and regular public transport. As such it is considered to have the capacity to accommodate significant new housing development. The Plan covers a 15 year time scale, and the housing is to be delivered over that timescale. The Carlisle Housing Need and Demand Study identifies that the District needs to accommodate an additional 665 houses/year to meet its housing needs. Additional housing brings additional infrastructure requirements, but also delivers those needs. As such it is considered that Brampton should accommodate the identified level of housing as set out in the Plan.

Proposed Change
 No change to policy in response to this comment.

0737 Comment Policy

154/26/27 Mr Bryan Craig

Detail
 As the answers to Item (b) in question H7 clearly shows, Dalston should not become a Key Service Centre.

Response
 The Plan does not define a settlement hierarchy approach. This approach was advocated in Regional Planning Guidance, replaced by Regional Spatial Strategies, and now scrapped by the Government. The NPPF does not advocate a settlement hierarchy approach, but has an overall presumption in favour of sustainable development. The NPPF has a set of 12 core planning principles that should underpin plan making and decision taking. One of these is that succinct local and neighbourhood plans should set out a positive vision for the future of an area. In addition, LPAs are advised to promote the vitality of our main urban areas, but also support thriving rural communities within the countryside. Dalston is one such thriving rural community, and the policies in the Local Plan make provision for Dalston to continue to thrive.

Proposed Change
 No change to the Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
o339	Support	Policy	10	
o84	Richard Greenwood	Cumbria Tourism		
Detail	Sufficiently flexible to support new initiatives in town centres and rural villages whilst at the same time preventing an over provision in areas such as Botchergate. Support.			
Response	Support noted.			
Proposed Change	No change.			
o816	Support	Policy	16	
160/35	Mrs Catherine Leach	Clerk to Bewcastle Parish Council		
Detail	It was felt that this policy was both sensible and practical. It met the needs of the farmer as well as other rural dwellers.			
Response	Comments of support are noted.			
Proposed Change	There is no proposed change in response to this comment.			
o866	Site Proposal	Policy	19	
117		Messrs Marrs		A010
Detail	Land adjacent Moorhouse Courtyard, Moorhouse: The land is well related to the village of Moorhouse which has previously been considered as appropriate for small scale housing developments. Carlisle and the consented urban extension of Morton with public transport and amenities is in reasonable distance. In addition there are nearby primary schools at Burgh by Sands and Kirkbampton. The land would provide a sensible option to provide rural housing with both primary and secondary schools nearby. This would provide a different kind of housing to the urban area in terms of feel but will still be well related to the wider services which are available in Carlisle. There are no substantial infrastructure constraints known which would prevent the land coming forward in a planned manner and is considered that it represents an opportunity to secure the growth of Moorhouse over the longer term in an area already considered under the previous plan to have some potential for housing development. In addition, it could contribute to the provision of rural affordable housing through a proportion of on site delivery. It is requested that the land be considered for an allocation for residential development within the forthcoming Local Plan.			
Response	The site lies 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. It also lies immediately adjacent to the listed buildings at Moorhouse Courtyards.			
Proposed Change	No new site allocation in response to this proposal.			

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

1133 Objection Policy 19

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail

This policy states that 30% of all new housing developments will be in the rural areas. The allocation allows for 881 new units- over 50% in Brampton, 25% in Wetheral parish and 12% in Longtown and the remainder in the rest of the rural area. This is not cohesive long-term strategy for sustainable rural communities. Are these targets realistic?

A review is required in every village; the housing strategy excludes a large number of small rural communities. The draft plan should be revised to include all of these communities in order to enable developers to build small developments which include housing for the elderly and affordable rental in perpetuity. Housing needs and demands survey is required in all rural communities.

5.4 mentions housing for the elderly- this is needed in all communities and yet there is no provision.

5.10 mentions creating sustainable, inclusive and mixed communities, how can this possibly achieved?

5.11 States the housing target is based on a housing needs and demands study (HNDS) This was not carried out in each rural community, instead a certain percentage of communities were selected which will not necessarily be representative

The consultation clearly states (item D p.100) that smaller villages should be included as suitable locations for development yet very few of them have allocated sites, these should be included.

Response

The latest ONS mid-year population estimates show that there were 104 500 in the District mid 2010. Of this figure, 70 700 were living in the Carlisle urban area, and the remaining 34 000 in the rural west and rural east areas. This is an approximate split of 70% in the urban area and 30% in the rural area. As such Policy 19 makes provision for 70% of all new housing development to be delivered in the urban area and 30% in the rural area. There are not the resources available to carry out a housing needs survey in every village. Policy 19 is not the only policy that makes provision for housing development. Policy 20 enables housing development on sites that aren't allocated, and historic windfall monitoring shows that up to 100 new dwellings a year are achieved this way. Policy 20 is written in such a way as to allow housing in small rural communities where such development would maintain the vitality of the community.

The age profile for Carlisle District is slightly older than found regionally or nationally, with a greater proportion of people in all age groups from 45 onwards. Within the rural area there is a much larger proportion of people aged 45 and over than in the urban area. Nearly 30% of the population of each rural Housing Market Area (HMA) is aged 60 or over. Cumbria County Council have produced an 'Extra Care Housing Strategy 2011-2029', which identifies that 340 extra care units are required in the district up to 2019. There will be continuing dialogue with the County Council on how this can be delivered.

Currently criterion 4 of Policy 19 makes reference to specialist housing for vulnerable people. However, Policy 30 also makes provision for housing for those with special needs. For clarification, there will be a single policy (Policy 30) dealing with this issue.

A key element of the Nov 2011 HNDS was an assessment of both current and future affordable housing need. The most recent practice guidance on how to do this is contained in the CLG SHMA Guidance of August 2007. This states that it can be difficult to obtain a complete and robust estimate of current housing need including any backlog due to data limitations. Traditionally local surveys have been used although they can be costly to administer and difficult to interpret. Annex C of the guidance provides advice on undertaking household surveys. The 2011 HNDS followed this guidance. 10 000 survey forms were sent out and a total of 2581 were completed and returned. Paragraph 18 of the practice guidance states:

'A common misconception when sampling is that it should be based on a certain percentage of the population being studied. In fact, it is the total number of cases sampled which is important. As the number of cases increase, the results become more reliable but at a decreasing rate... Approximately 1,500 responses should allow a reasonable level of analysis for a local authority area'.

The Council does not have the resources to carry out village level surveys across the district. However, such surveys could be encouraged through the neighbourhood planning process, or through community plans. Dalston Parish Council has recently undertaken a parish housing needs (Sept 2013) survey using Cumbria Rural Housing Trust.

The HNDS identifies the district wide need for affordable housing. Local surveys can identify more detailed local need at a given point in time within a parish. They will be

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

encouraged through neighbourhood or community led plans.

Proposed Change Delete criterion 4 as this issue of specialist housing for vulnerable people should be dealt with as a whole in Policy 30, for clarity. Policy 30 amended to expand on how such housing can be delivered.

0402 Site Proposal Policy **19**

094 Cllr Betton

Detail I would also suggest that Rosehill car park land be proposed for housing to fit in with the idea of a health centre and the community. I have been emailed alternative brown field sites available that City Council own and I am also aware that County own brownfield areas also, I would like to encourage the use of these areas, some of which are not on the local plan to be alternatively used and that Durranhill Road is left out of the local plan.

Response Western part of the site is contaminated, and lies within Flood Zone 2. The site is heavily used as a car park serving the range of uses on Rosehill Industrial Estate. The site is almost entirely surrounded by employment uses. Housing in this location would be isolated from other houses and would lead to the loss of valuable facility on the industrial estate, leading to the displacement of parking onto surrounding streets, to the detriment of the amenity of the area.

Proposed Change No new allocation in response to site proposal.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0404	Site Proposal	Policy	19	
094	Cllr Betton			
Detail	There is outline planning permission in for brown field old COOP dairy land, I feel this land would be ideal to be encouraged in the local plan and recommended for part industrial and part residential. The link to the M6 is close by and even better on this site is a link to the railway for transport of business goods to Newcastle, Leeds etc.			
Response	<p>This is a brownfield site in a sustainable location. Paragraph 22 of the NPPF explains that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</p> <p>The site appears to have been on the City Council's Vacant Property Register since 2009. More recently, the letter from Hyde Harrington dated the 4th July 2013 explains that negotiations were ongoing between March and October 2012 with Bevcn at the end of which they withdrew from a proposed purchase because the proposed distribution centre to be built by Stobarts at the Airport, would alter the dynamics of the logistics industry within the City. In the intervening period a "For Sale" board was placed on the front gate on the 26th March; it was advertised in the Cumberland News on the 26th April; and details placed on the Hyde Harrington website. In response Hyde Harrington received enquiries but they have not been followed up with any offers or firm proposals. The letter goes on to explain that there is a ready supply of (employment) land available for development across the City; the Durranhill and Rosehill Estates are the recognised business locations in this sector of the City which have better access to the road networks; the site is opposite a housing estate meaning that any business is likely to favour sites where is less likelihood of tension from conflicting uses. The letter concludes by saying that the change of use for residential purposes would be more likely to produce investment and development within this area of the City.</p> <p>In June 2010 DTZ prepared a report on the "Carlisle Employment Sites Study: Implications for M6 Corridor" which identified employment sites to be retained and managed; those appropriate to consider alternatives; and those considered to be no longer required for employment use and which could be released immediately for residential or mixed use. A current application for the site (13/0655) fell into the latter category with the potential alternative use summarised as "residential for vacated dairy part of the site". The application has been recommended for approval subject to the completion of a S106 agreement.</p>			
Proposed Change	Site allocated for housing development with indicative yield of 66.			

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

0443 Site Proposal Policy 19

099 Simon Thomas & Shelly Bullman Joint Administrators Newtown Ind A016

Detail In order to assist Carlisle City Council in planning effectively to fully meet its needs for housing supply and to contribute towards a deliverable Local Plan, we consider it appropriate for Newtown Industrial Estate to be reallocated in the new Local Plan for residential development. [Link to Rep 0444 Policy 2]

Additions Information:

Background to the site; Employment Land review 2012; Housing Land Supply; Market Demand; Suitability for Residential Development; Social & Environmental Role; Economic Role.

Response The site is identified in the ELR as a site that could be released for residential development. The ELR also states that Carlisle has an excess of employment land supply over demand. The site has been marketed for the past 18 months with no demand. The consultee states that the original occupation of the premises ended approx 15 years ago. There were a number of subsequent uses, although the building is now vacant. The NPPF states that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose.

The site can be accessed from either Newtown Road or Kittiwake Road in the adjacent housing development to the east. Potential constraints could include contamination issues from former use, and proximity to River Eden SAC.

Proposed Change Site allocated for housing development with indicative yield of 40.

0483 Comment Policy 19

103 Kingmoor Park Properties A017

Detail Policy suggests an average annual district housing target of 550-650 houses per year. Given that the evidence underpinning the emerging Local Plan suggests that 665 units per year would support economic growth (with the lesser figure of 545 merely maintaining the status quo) in the interests of taking a positive approach to plan-making as advocated in the NPPF, it is recommended that Policy 19 should identify 650 units as a minimum annual housing target.

Response Policy 19 has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period. This reflects the evidence in the 2011 HNDS.

Proposed Change Criterion 1 amended to set district housing target of 665 dwellings/year.

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

0090 Site Proposal Policy 19

040 Client of Taylor & Hardy Ref: MEH/JJ/C12/030 A004

Detail Site at Cummersdale - Map attached.
 The site has many positive attributes which are set out in figure No 4 (attached) and these attributes have been discussed in a meeting with an LPA officer on 4 June 2013 and set out in correspondence dated 10 June 2013. That letter also highlighted several points regarding it's suitability (repeated in the representation).
 The site is in a very sustainable location close to a wide range of facilities and hope that consideration will be given to the allocation of the site.

Response Cummersdale is a small village with a pub, a primary school and a village hall. The Rural Masterplanning work identified that generally, there was positivity towards some development of Cummersdale that would provide for the needs of the community and support the existing services. The existing allocated site gathered the most support from the community. The Cummersdale Community Plan also identified a need for some additional housing in the village. The existing allocated site is considered to be a preferable alternative to this site. In terms of scale, it is not considered appropriate for the village to accommodate any additional housing above the preferred allocation.

Proposed Change None. No new allocation as a result of this site proposal.

0534 Site Proposal Policy 19

111 Cowen Flowline Ltd A018

Detail Land at Ellers Mill, Dalston. Dalston is clearly a significant settlement with a range of services and facilities. The quantum of development proposed to be allocated is minimal at 15 units. Further allocations are needed. A plan showing 2 potential areas of land are attached together with a schematic plan showing how development could take place. The site has 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 Policy encourages mixed uses.

Response Recent planning permission has been granted in the centre of Dalston for 121 houses. This is considered to be appropriate in terms of size and scale for the settlement and the level of services that it provides. The site is also well located in relation to accessing all local services and facilities on foot. It is not considered that Dalston requires a further housing allocation in order for the Local Plan to meet it's objectively assessed housing targets.
 The proposed site at Eller's Mill is split into sites A and B. Site A lies in open countryside between a no through road and the Ellers Mill access road. Site B lies within Flood Zone 3a. Flood zone 3a is defined as 'high probability'. The NPPF states that local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. The aim of the sequential test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.
 The site also lies within Dalston Conservation Area, immediately adjoins a SSSI/SAC, and is subject to TPOs. The existing means of vehicular access to Eller's Mill is restricted.

Proposed Change No new allocation in Plan in response to this site proposal.

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

0548 Site Proposal Policy 19

117 Messrs Marrs A010

Detail Land identified south west of Cummersdale 27/09/13 : 2 additional plots requested to be added to the submission. The land is well related to Carlisle and the consented urban extension of Morton with public transport and amenities in reasonable distances. The land would provide a sensible option to continue to grow the City to the West adjacent major employer of Pirellis and with both secondary and primary education nearby. There are no substantial infrastructure constraints known which would prevent the land coming forward in a planned manner and it is considered that it represents an opportunity to secure the growth of Carlisle of the longer term in an area already shown to have growth potential.

Response The sites are physically and visibly separated from the village of Cummersdale. If these sites were allocated it would lead to isolated housing development in the open countryside, contrary to policies in the NPPF.

Proposed Change No new allocation proposed as a result of this site proposal.

0562 Objection Policy 19

121 Mike Fox Brampton Economic Partnership

Detail 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. [Comment supported by Burtholme Parish Council]

Response Brampton is the second largest settlement in the District, with a population of approximately 4000. It has a good range of local services and facilities, including a primary and secondary school, community facilities including a library and doctors' surgery, and a range of shops and other businesses. As such it is a sustainable location for a significant level of new housing. The Strategic Housing Market Assessment (SHMA) (Carlisle Housing Need and Demand Study) is subject to an update to take account of the latest Census information. This will ensure that population statistics are robust.

Proposed Change No change to policy as a result of this objection.

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

0589 Comment Policy 19

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail
Housing and Level of growth
Allerdale and Carlisle do not share Housing Market Areas and from their evidence base (both in terms of land supply and infrastructure capacity) there is no cross boundary issue in terms of capacity to deliver. As with Carlisle, Allerdale have a significant number of housing commitments.
The proposed level of growth is ambitious but does not necessarily cause cross boundary issues. In discussions during preparing both local plans it was acknowledged that Carlisle is a sub-regional centre but that role does not inhibit the role of Wigton, located in Allerdale. Wigton is a market town that operates as a strong local centre that meets local housing, employment and retail needs for the town and its rural hinterland. Its role is complementary to Carlisle. [see also rep 0588 Policy S 2]

Response
Noted. Carlisle will welcome further discussions with Allerdale under the Duty to Cooperate, to continually review the requirement under the duty.

Proposed Change
No change to Plan in response to this comment.

0074 Comment Policy 19

034 Lucy Adamski Aoo8

Detail
Support the policy as a matter of land use principle given the need to provide for housing choice and growth but with suggested comments – see below.
19(4) - it is recommended that the term “ageing population” be perhaps revised to “an increase in the proportion of older people.”
Also, the terms Extra Care is often used as the only example of housing offers for older people, which can vary quite significantly. A more generic term should perhaps be considered or, alternatively, additional examples of housing offers for older people are referenced but by no means made finite. For example, down-sizers are a sizeable component of the older population, where individuals or couples may be under-occupying a 3/4/5 bed family homes that they no longer can, wish or are able to afford to maintain or run.
19(5) - it is considered that greenfield sites in sustainable locations should also be referenced.

Response
Criterion 4 has been moved to Policy 30 which makes provision for housing to meet specific needs. The term 'older people' has been used. The allocated sites listed in the policy are all considered to be in sustainable locations.

Proposed Change
Criterion 4 has been moved to Policy 30 which makes provision for housing to meet specific needs. The term 'older people' has been used.

0597 Site Proposal Policy 19

127 Margaret Miller Cumbria Housing Group

Detail
land at Wigton Road, Morton: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing. [SHLAA site CA 59]

Response
Support noted.

Proposed Change

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Consultee Ref No	Consultees.Contact	Organisation	Agent	

0599 Site Proposal Policy **19**
 127 Margaret Miller Cumbria Housing Group
 Detail Land at Dene Crescent, Belah: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing. [SHLAA site CA 55]
 Response Support noted.
 Proposed Change

0600 Site Proposal Policy **19**
 127 Margaret Miller Cumbria Housing Group
 Detail Land at California Road, Kingstown: Cumbria Housing Market Group promote the allocation of the site which will support delivery of affordable housing.
 Response The site is immediately adjacent to Carl 1, which is allocated for 217 houses. The two sites would need an integrated approach to development, to ensure that access, design and other infrastructure requirements are delivered successfully. Cumbria County Council have indicated that there are primary school capacity issues in north Carlisle. To resolve this, the County Council have indicated the need to look for additional housing sites north of the river to fund additional primary school places.
 Proposed Change Allocate 6.54 hectares for 200 dwellings.

0601 Site Proposal Policy **19**
 127 Margaret Miller Cumbria Housing Group
 Detail Land at Wood Street: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing.
 Response Support noted.
 Proposed Change

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

0602 Site Proposal Policy **19**

127 Margaret Miller Cumbria Housing Group

Detail Land at Greta Avenue: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing.

Response This response to be included in summary of responses to show deliverability of site.

Proposed
Change

0603 Comment Policy **19**

127 Margaret Miller Cumbria Housing Group

Detail Raffles Development Land: Cumbria Housing Market Group support the development of the site which will support delivery of affordable housing.

Response The land being developed at Raffles has planning permission and is therefore not included in the table of allocations in Policy 19.
CHECK with Fiona re: how this contributes to supply.

Proposed
Change No change to policy in response to this comment.

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0697 Comment Policy 19

150/22 Mr Ian Yates

Detail The proposed 70% - 30% split between urban and rural seems about right but with regard to specialist housing for the elderly, I think a more detailed housing needs survey needs to be carried out in the rural area, at individual village level, to determine how many such houses are likely to be needed and where they ought to be located. Regarding housing for the elderly, more research needs to be undertaken to determine more precisely how many such houses are needed and where they ought to be located.

Response Resources are not available to carry out a housing needs survey in every village. Policy 19 is not the only policy that makes provision for housing development. Policy 20 enables housing development on sites that aren't allocated, and historic windfall monitoring shows that up to 100 new dwellings a year are achieved this way. Policy 20 is written in such a way as to allow housing in small rural communities where such development would maintain the vitality of the community.

The age profile for Carlisle District is slightly older than found regionally or nationally, with a greater proportion of people in all age groups from 45 onwards. Within the rural area there is a much larger proportion of people aged 45 and over than in the urban area. Nearly 30% of the population of each rural Housing Market Area (HMA) is aged 60 or over. Cumbria County Council have produced an 'Extra Care Housing Strategy 2011-2029', which identifies that 340 extra care units are required in the district up to 2019. There will be continuing dialogue with the County Council on how this can be delivered.

Currently criterion 4 of Policy 19 makes reference to specialist housing for vulnerable people. However, Policy 30 also makes provision for housing for those with special needs. For clarification, there will be a single policy (Policy 30) dealing with this issue.

Regarding detailed housing needs surveys, a common misconception when sampling is that it should be based on a certain percentage of the population being studied. In fact, it is the total number of cases sampled which is important. As the number of cases increase, the results become more reliable but at a decreasing rate...

Approximately 1,500 responses should allow a reasonable level of analysis for a local authority area.

The Council does not have the resources to carry out village level surveys across the district. However, such surveys could be encouraged through the neighbourhood planning process, or through community plans. Dalston Parish Council has recently undertaken a parish housing needs (Sept 2013) survey using Cumbria Rural Housing Trust.

Local surveys can identify more detailed local need at a given point in time within a parish. They will be encouraged through neighbourhood or community led plans.

Proposed Change Criterion 4 has been deleted and the issue of housing for specific needs including the elderly is now dealt with as a whole in Policy 30.

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0061 Objection Policy 19

033 Matthew Good Home Builders Federation

Detail

The policy is unsound because it is not justified, positively prepared, effective or consistent with national policy. The proposed policy contains several omissions and flaws which will result in under-delivery against the stated requirement. The requirement itself differs from that identified in policy S2 and takes no account of previous under-delivery.

The policy indicates a housing target of between 550 and 650, this is both confusing and contrary to Policy S2. Policy S2 states the housing requirement is for 9000 homes or 600 new dwellings per year over the full plan period. It is therefore unclear why the Council is indicating a range within this policy. Neither the policy nor the supporting text identify a justification for the use of a range which is equivalent to 1,500 dwellings over the plan period.

The use of a range of figures is not supported by the NPPF which requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements (paragraph 47). To enable the Council to identify its 5 year housing supply it will need to identify a 'figure' for the objectively assessed annual housing need. It is perfectly legitimate for the Council to provide greater housing than its objectively assessed need as this would fulfil the ethos within the NPPF to significantly boost housing supply. As discussed in our comments on Policy S2 and based upon the Council's own evidence the chosen figure should be in excess of 665 new dwellings per annum.

The policy is also not clear on whether the 550 to 650 range represents net or gross 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 within Policy 19 are confusing are not adequately explained. They do not clearly relate to either end of the target range or any other figures within the plan. Indeed even the urban and rural figures do not accord with the district total shown at the bottom of the table. There is also no mention of how much development is expected to come from the broad areas of search. This confused picture does not provide any certainty for developers or residents alike and calls into the question the Council's approach to dealing with its objectively assessed need for housing.

The Council also appear to have omitted under-delivery against the former RS requirement of 450 dwellings per annum. The Council's 2011 to 2012 AMR indicates a shortfall of some 593 dwellings. This shortfall needs to be accommodated in the new plan. The Council will be aware that recent appeal decisions indicate that any deficit should be included in the first five years of the plan and not spread across the whole of the plan period. In addition the recent government guidance prepared to accompany the NPPF notes;

'Local Planning Authorities should aim to deal with any under-supply in the first five years of the plan period where possible. Where this cannot be met in the first five years, local planning authorities will need to work with neighbouring authorities under the duty to co-operate'.

Therefore, presuming the deficit remains at its current level, this will require an additional 100 dwellings per annum to be delivered early in the plan period.

It is noted that to deliver its housing requirement the Council is reliant upon the delivery of 50 windfalls each year of the plan period to deliver its housing requirement. Given the proposed figures this is a significant proportion of the overall supply. NPPF paragraph 48 indicates windfall allowances can be made in the 5 year supply providing there is compelling evidence such sites consistently come forward. However the NPPF does not specifically state that a windfall allowance can be included in the supply of land for years 6-10, 11-15 etc.

The Council will need to provide 'compelling' evidence that such a scale of windfalls can be consistently delivered. Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a 5 year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of a windfall allowance is not used as a mechanism to reduce the number of sites allocated within the plan. The Council's attention is drawn to the recent Inspectors decision upon the Selby Core Strategy where its windfall allowance has been removed from the annual targets for the plan and is instead provided as a buffer.

It is equally important that the delivery of windfall sites against the assumptions identified is closely monitored through the AMR. Failure to achieve the windfall assumptions will require the Council to consider releasing other sites, or to review its plan, to ensure it maintains a 5 year housing supply and fulfils the housing

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requirements within the plan.

Recommendation: The policy appears to contain numerous flaws and uncertainties. It is strongly recommended that the Council reconsiders this policy and provides a clear, justified position on housing including a housing figure based upon the Councils own evidence for an objectively assessed need. The use of windfalls should be restricted wherever possible and whilst Policy 20 is noted more detailed information should be included concerning how the Council will deliver in the 'broad areas of search'. To ensure delivery against the targets the Council will need to provide a housing trajectory that illustrates how the permitted and allocated sites as well as the 'broad areas of search' will contribute to meeting the housing targets. The trajectory should include the expected rate of completions on each site over the plan period. The Council will also need to identify whether a buffer of 5% or 20% additional sites will need to be factored-in to the 5 year housing land supply. Given the significant under-delivery since 2003 it is considered that a 20% buffer will be required.

Response	<p>The housing target in Policy 19 has been amended to 665/yr and includes a backlog figure of 827 (from 2008) which is spread over the Plan period at 55/year. Backlog has been spread over the Plan period on the advice of the Planning Inspectorate in a compliance meeting, where it was advised that delivery was an issue in Carlisle district due to the shortage of volume housebuilders.</p> <p>The housing target represents net completions, and the Council's monitoring of housing supply shows net completions.</p> <p>The table in Policy 19 has been revised to show: District Target; Housing Required 2015 to 2030 [split as in criteria 2]; Backlog from 2008 to Sep 2013 [actual split]; Total Need Existing Permissions [as at 30 September 2013]; Minus 18 month target delivery of 450 per annum; Plus Windfall @ 100 per annum [historic split]; Permissions contributing to District Target Total Need; Minus brought forward Permissions; Allocations Required.</p> <p>The table also includes a section on delivery for years 0 - 5, 6 - 10, and 11 - 15.</p> <p>The windfall allowance has been increased to 100/yr on the advice of the Planning Inspectorate, as windfall for the last five years averages 186 per annum.</p> <p>Windfalls are closely monitored in the 6 monthly housing land availability, and in the AMR. A housing topic paper will be produced for the Examination in Public which will show historic windfall completions. Policy 19 amended to state that if windfalls tail off, we will bring more allocations forward.</p> <p>Carlisle South has stand alone Policy (S3).</p>
Proposed Change	<p>Housing target amended to 665/year.</p> <p>Backlog included in table with Policy 19.</p> <p>Table clarified and re-ordered.</p> <p>Additional text added: "Windfalls will be monitored closely and if supply from windfall declines, additional allocations will be brought forward".</p>

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0052 Objection Policy 19

029 Client of Taylor & Hardy Ref: MEH/JJ/C12/036 A004

Detail Land adjacent Hallmoor Court. Wetheral (SHLAA ref WE 03) is neither referred to or identified as a site suitable for residential development. The site is subject to a current planning application (12/0880) and are very concerned that the suitability of the site for this form of development has not been identified in the Draft Local Plan. It is considered that this objection ought to be addressed by the allocation of the land for residential development.

Response The current planning application is subject to an objection from United Utilities. The objection has not been resolved. As such there are significant questions over the deliverability of this site for housing. As such, the Local Plan would not seek to allocate this site, as the NPPF states that LPAs should "identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing...".
If the constraint is overcome, and planning permission is granted, there will be no need to allocate the site in the Local Plan.

Proposed Change No change to policy in response to this objection.

0547 Site Proposal Policy 19

116 Messrs Story A010

Detail Land identified west of Cummersdale. Then land is well related to Carlisle and the consented urban extension of Morton with public transport and amenities in reasonable distances. The land would provide a sensible option to continue to grow the City to the West adjacent major employer of Pirellis and with both secondary and primary education nearby. There are no substantial infrastructure constraints known which would prevent the land coming forward in a planned manner and it is considered that it represents an opportunity to secure the growth of Carlisle of the longer term in an area already shown to have growth potential.

Response The site is physically and visibly separated from the village of Cummersdale. If this site was allocated it would lead to isolated housing development in the open countryside, contrary to policies in the NPPF.

Proposed Change No new allocation proposed as a result of this site proposal.

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0174	Objection	Policy	19	
065		Messrs Parker, Brown, Owens and	A014	
Detail	<p>SHLAA Site TH 02 - Land at Chapelfield Lane, Thurstonfield</p> <p>Upon further consideration we wish to amend the area of the site which we originally proposed to 1HA [map enclosed]. The revised proposed allocation is comfortably in proportion to the scale of the settlement and could provide 21 or 22 dwellings within the 15 year period as required.</p> <p>Further comments are made with regard to the comments made on the SHLAA site assessment and additional supporting statements made.</p>			
Response	<p>Thurstonfield could be described as being in a cluster with Burgh by Sands, Moorhouse, Great Orton, and Kirkbampton (which lies in Allerdale District). These villages between them provide primary schools, pubs, village halls and churches. Thurstonfield itself has no services, although there is a small Methodist Chapel. As part of the rural masterplanning process, a focus group meeting with the parish council identified that there was probably no need to allocate additional land at present within Thurstonfield. However, the City Council considers that as the Plan covers a 15 year time period, it may be necessary to allow small scale new development to meet local housing needs. This can be provided through Policy 17 of the Local Plan which makes provision for windfall housing applications.</p>			
Proposed Change	<p>No change to Local Plan as a result of this objection.</p>			

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0091 Objection Policy 19

041 Nigel Holmes

Detail

The document proposes 233 more houses in Wetheral parish Area in addition to those already approved or in the planning process. I take issue with the omission of any proposal to create one or more new villages. Surely that would be a far better solution than ever extending existing villages so altering their ethos - the very thing people who choose to live in the rural area are seeking. Comments are also made as to the conflict with Policy 6o (Development affecting conservation areas). Population growth and its effect are commented on. Issues is taken with the statement: "aims to create attractive, sustainable communities where people want to live" and how this fits with the proposal for 233 more dwellings in the Parish. Further comments regarding the shared school for Wetheral and Scotby and how it cannot sustain another 150 or more houses - perhaps Wetheral should once again have it's own infant or primary school. The document says "We need to support and educate parish councils and members on local issues to break down political barriers.... Planning boundaries in rural areas stop people doing what is needed." Is anyone listening in the Civic Centre if we turn that around and say "Parish councils need to support and educate the City Council, its members and officers, so that they are not blinkered by political prejudice and are open to fresh thinking and new concepts of suitable settlements in the countryside?"

Response

The proposed level of growth in the Plan is considered to be sustainable to the district as a whole, and to the locations to which it is allocated. The latter part of the Plan period proposes an urban extension in the broad location of Carlisle South. This will provide the opportunity to create new communities. The Education Authority advise throughout the Local Plan process on the provision of school places and on the capacity of existing schools. Proposed allocations are scrutinised by the Education Authority. If the level of growth requires a new primary school, the Local Plan can allocate a site in conjunction with the Education Authority. The comment about educating parish councils was made by a consultee in response to previous rounds of consultation on the issues and options that could be contained in the Plan. It does not form part of the document, but is merely reporting back the response from previous consultation. This consultation section is updated at each new stage of the Plan.

Proposed Change

No change to Policy 19 in response to this objection.

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0092 Objection Policy **19**

042 Mr & Mrs J Myers

Detail We don't agree to any plans to build any more houses or industrial development on the back of Alexandra Drive and to the west of Barley Edge. Any more development and we won't have any countryside left round our area plus our roads are not suitable for any more traffic. There is no proper footpath on the back of Scotby Road by the road leading up to the nunnery it is very bad walking up there. Plus the speed of the traffic.(same rep as 0090 Policy 1)

Response The site to the rear of Alexandra Drive is currently allocated in the adopted 2008 Carlisle District Local Plan, and has been assessed through the previous Local Plan inquiry. Barley Edge is the first phase of that development, and the layout allows for access to the rest of the site. The site is in a sustainable location on the edge of Carlisle, close to local services and amenities, and public transport. The opportunities for brownfield development in Carlisle are extremely limited, due to a good historical record of these sites being developed. Therefore in order to meet the identified housing target in the Plan, it is necessary to identify greenfield site on the edge of the City. Both Barley Edge and Alexandra Drive are recent greenfield site developments, and have helped meet the need for housing in the District. No valid reason has been put forward to deny other potential homeowners the opportunity to live in a new home in Carlisle.

Proposed Change No change to policy in response to this objection.

0094 Comment Policy **19**

043 Nigel Winter Stagecoach

Detail With regard to the housing targets of 550 to 650 homes per year, a number of issues have been raised regarding capacity of the public bus transport network and other associated issues.

Response The Infrastructure Deficit Plan will address the issue of public transport capacity. The Council will encourage developers to liaise with public transport operators, so that the infrastructure required as a result of a development proposal can be accommodated. This will include such matters as additional bus stops, additional or extended routes, and potentially additional services. Development must be sustainable in all respects, including in terms of accessibility and location. Where the impact of a development proposal on the public transport network needs to be mitigated, a section 106 may be entered into.

Proposed Change No change to policy in response to this objection.

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0096 Site Proposal Policy 19

045 Messrs Rutherford

Detail As only high density housing has been proposed within Brampton we would like to suggest an area of land situated between the upmarket houses on Capon Tree Road and the Brampton bypass for low density high value, executive type housing. We feel our suggested development should have no reason not to be included as it has almost no houses overlooking the proposed site. The area we propose to be included in the local plan as 12 acres in total and we feel that it would be in keeping with Capon Tree large exclusive housing and if anything would compliment and lift the status of Brampton as a whole. A number of photos of the area are enclosed showing the area involved.

Response This site is more than 1.56 km from the centre of Brampton. Capon Tree Road, where it borders the west of the site, (a no through road at this point) is a single track road, and would not be suitable to access a development of the size proposed. The minor road to Aaron's Town (also a no through road), which ends at the north eastern boundary of the site is equally unsuitable. Access would not be permitted onto the A69. The landscape here is gently rolling and attractive. There are other more suitable sites located more centrally within Brampton, which will meet the Local Plan target for housing.

Proposed Change None. No new allocation as a result of this site proposal.

0099 Objection Policy 19

047 McKnight & Son Builders Aoog

Detail My client objects to the exclusion of Site 1 [map identifying site 1 & 2 East of California Road enclosed] from the list of sites allocated for residential development. My client confirms that Site 1 is available to be developed and would like to see this land brought forward for housing development. A list of supporting statements as to its suitability is given. However if the Council were to consider a larger, strategic housing allocation in this location, my client confirms that both sites 1 and 2 could be brought forward for housing development.

Response 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.

Proposed Change No change to policy in response to this objection.

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

0105 Objection Policy 19

049 Mr D Nash

Detail Re Criterion 5: there is nothing in the plan that says Carlisle will only accept the building on Greenfield sites when all Brownfield land has been exhausted. Failure in this direction will invite developers to apply to build on Greenfield sites while leaving Brownfield sites vacant.

There are also omissions which I would like to address:

- the Councils commitment to take a strong line with developers who gain approval for Outline Plans, and no sooner are these accepted then the developer submits revised plans which bear little resemblance to those originally approved.

- a firm policy stating that the Council will use its Statutory Powers in disposing or developing redundant and derelict buildings. This will in my opinion, remove the speculative purchases of old buildings that are then left to rot, as evidenced by The Lonsdale, Tarn End Hotel, The Central Plaza Hotel.

Response The NPPF removes the previous requirement to set a brownfield target, and there is no longer a national brownfield target. The Government impact assessment for the NPPF noted that:

"The target to build 60% of England's new homes on brownfield land was introduced in 1999. This centrally imposed target had negative outcomes, resulting in imbalances in housing provision for example between blocks of flats and family homes with gardens. The brownfield target was also seen to drive up land prices in certain areas and would increasingly limit the supply of new housing as stocks of brownfield land are used up, which would harm first time buyers."

The NPPF now states as one of its 12 core principles that planning should, "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value".

Historically, building on brownfield sites in Carlisle has taken place at a high rate, and consequently there are very limited opportunities left to do so.

The latter two points made in the objection are not matters for a Local Plan to consider. CPO powers are subject to their own legislation.

Proposed Change

0116 Comment Policy 19

051 Story Homes Ltd A010

Detail Story Homes supports the Council's ambitions to increase Carlisle's housing supply. However the target in S2 is 600 pa whilst the target in Policy 19 is 550 - 650, this does not seem to accord with the NPPF requirement for a specific 5 yr supply against a figure for an objectively assessed housing need. It is also unclear as to whether the existing housing under supply against the relevant RSS targets have been accounted for. According to the 2011 - 12 AMR the RSS target was missed by 593 units, if the potential upper limit of 650 was to be achieved this would require an additional 250 units resulting in the potential for an additional 843 dwellings in years 1 - 5.

Response The annual housing target in Policy 19 has been amended to 665/year, and the backlog figure of 897 included.

Proposed Change Housing target amended to 665/year.
Backlog included in table with Policy 19.
Table clarified and re-ordered.
Additional text added: "Windfalls will be monitored closely and if supply from windfall declines, additional allocations will be brought forward".

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0137	Objection	Policy	19	
058	Client of Taylor & Hardy	Ref: MEH/JJ/Co2/134	A004	
Detail	<p>Land at Lambley bank Scotby [SHLAA Ref OC 40]</p> <p>My client objects that the above site is neither referred to nor identified as a suitable site for residential development. They are concerned that the suitability of the site for residential development, this development could comprise low density development carefully and sensitively sited so as to ensure an appropriate relationship with the existing built development at Lambley Bank, has not been identified in the Draft Local Plan.</p> <p>The legitimacy of the objection which is lodged is reinforced by reference to the land immediately opposite the site - Lonning Garth [SHLAA Ref OC 13] which now has the benefit of a Full Planning Permission 12/0944 granted 28 Dec 12.</p> <p>It is considered that this objection ought to be addressed by the allocation of the land for residential development.</p>			
Response	<p>The site opposite has permission for 1 dwelling. This is not a strategic level of housing and the site did not need to be allocated in the Local Plan for this permission to be granted. Policy 20 makes provision for housing development not on allocated sites. The site the subject of this objection lies within the Settle/Carlisle Conservation Area, an area characterised by low density large detached houses in substantial gardens. Whilst the principle of some housing development on this site is accepted, the Council will not seek to allocate it in the Plan due to its small size, and the limited number of houses that would be appropriate for the site.</p>			
Proposed Change	<p>No change to policy in response to this objection.</p>			
0141	Objection	Policy	19	
061	Mr Stephen Prince	Cumbria NHS Partnership FDN Trus	A012	
Detail	<p>Object that SHLAA site CA 27 E has not been allocated for housing development:</p> <ul style="list-style-type: none"> - supports housing development in years 6 - 10 - development should be consistent with the Former Garlands Hospital Planning Brief July 2010. <p>It should therefore be included in Policy 19 - Housing Allocations.</p>			
Response	<p>The site was not allocated as a preferred option for housing in the first phase consultation on the Local Plan, as there were other preferable sites within this locality, and the Highways Authority had indicated that the surrounding road network and junctions would be at capacity. However, as a result of the consultation, site Carl 3 has been deleted as a preferred option for housing, as part of the site is no longer available, and the remainder is on a long term lease for recreational use. The implications of this are that another site will need to be allocated in order for the Plan to be able to meet the proposed housing target.</p> <p>Site (SHLAA ref CA 27E) is available now, does not have any landscape or biodiversity designations, has direct access onto the highway network, and is close to the public transport network. However, it is located on the very fringes of the southern edge of Carlisle, and is a considerable walk from the nearest local shops and primary school. This would need to be addressed through any development proposals for the site.</p> <p>There is a public footpath which crosses the southern part of the site from west to east, which would need to be retained with an appropriate buffer on either side. In addition, the site is open to noise pollution from the M6 which is almost immediately adjacent to the eastern boundary of the site. As such a significant noise buffer will be required, which will be both structural bunding and landscape planting.</p>			
Proposed Change	<p>Allocate site north of Carlton Clinic and east of Cumwhinton Drive for 150 houses.</p>			

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

0153 Comment Policy 19

062 Church Commissioners for England A013

Detail	<p>It is vital that the Local Plan housing strategy meets the housing needs for the district for both the City of Carlisle and its rural areas. The housing target should be exactly that; a target, not a capped figure. It is therefore proposed that criterion 1) of Policy 19 should be amended to read "Contribute to achieving an average annual district housing target of 650 houses per year"; deleting reference to 550 dwellings. This will ensure that the policy is in accordance with the NPPF and the need to 'significantly boost housing development' in the district.</p> <p>Furthermore, in association with criterion 2) of Policy 19, we support the change proposed to the 'Development split' between the urban and rural areas, compared to what it is currently set out at in the existing Local Plan. The existing Local Plan states at Policy H1 that "During the Plan period 80% of new development will be located within the urban area of Carlisle, including allocated sites on the edge of the City referred to in Proposal H16. The remaining 20% will be permitted in the rural area of the District with the focus on the two Key Service Centres of Brampton and Longtown". The change to a ratio of 70:30 is welcomed.</p> <p>Notwithstanding the above, for Policy 19 to be found sound and to be effective and flexible, it is proposed that the following text should be inserted at the beginning of the criterion: "seek to achieve 70% of all new housing development in the urban area..." and, as set out above, it is considered that further clarification as to what defines the urban area to the rural area is needed before the policy can be fully supported, particularly as development limits are proposed to be removed from the smaller towns and larger villages.</p> <p>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 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. It may also be beneficial to have a definition of small and large scale sites included within the plan.</p> <p>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.</p> <p>Finally, in respect of criterion 5 set out in Policy H19, to ensure that deliverable sites are allocated for development the Council should not over rely on brownfield sites, particularly in the short term. As set out in paragraph 5.3 of the document, the number of brownfield sites available for development is diminishing. In addition, brownfield sites will take time to be delivered and completed and viability is often marginal. On this basis, adequate greenfield sites (throughout the district, not just in Carlisle) must be allocated to ensure the development need and demand for the entire district is met, particularly housing development.</p>
Response	<p>Policy 19 has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period. The Policy does not read as if this is a capped figure. Agree that 'seek to achieve' would add greater clarity to criterion 2.</p> <p>The Housing Topic Paper, which will be produced for the publication stage of the Local Plan, will outline how housing numbers are calculated. Nursing homes and student accommodation, unless self contained flats, are not currently calculated in housing supply figures. The Council does not place over reliance on brownfield sites, and has an excellent track record of brownfield sites being developed in the City. Sufficient greenfield sites have been allocated, as can be judged from the list of sites in Policy 19.</p>
Proposed Change	<p>Criterion 1 amended to set district housing target of 665 dwellings/year.</p> <p>'Seek to achieve' added at start of criterion 2 of Policy 19.</p>

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

0155 Site Proposal Policy 19

062 Church Commissioners for England A013

Detail

Land West of Steele's Bank [map attached]

The site (1.6 ha) is located south west of the built up area of Wetheral and is in close proximity to a wide range of existing local services and facilities. This site is surrounded by residential development to the north and east and, open countryside to the south and west. Development of the site would round off the south west of the settlement with access available straight from the existing highway. Further information submitted regarding the site and comments regarding the 'Rural Masterplanning' work that has been undertaken between the Council and CABE. The site has also had previous support from the Policy team for early release during the previous Interim Housing Planning Policy review. Please see below support received to date in respect of the future development of the site.

Carlisle City Council Planning Policy Team: "... The site is well related to Wetheral and adjacent to a residential area. Subject to consideration against the criteria in Policy H1 of the Carlisle District Local Plan 2001-2016 and other relevant policies in the Plan, development of the site would be acceptable in principle...

Any scheme should have regard to planning policies in the Local Plan together with the Council's Supplementary Planning Document "Achieving Well Designed Housing". In addition, paragraphs 56 of the NPPF imposes great importance to the design of the built environment and any scheme should reflect this. Highways and county Ecologists Comments have also been submitted.

Following discussions with the consultees as set out above, we consider this site to be acceptable for future residential development and should therefore be allocated for housing in the new Local Plan.

Response

The site opposite, on the other side of the B6263, is shown as an allocation in the preferred options Local Plan, with an indicative capacity of 98 houses. At the time this allocation was made, there were no alternative sites proposed for Wetheral, and it was considered that taking into account the size of the village, and the existing level of services, 98 houses was an appropriate level of housing for Wetheral to accommodate over the Plan period. There are approximately 680 houses in the village, and whilst the local services include a doctors' surgery and railway station with trains to Carlisle and Newcastle, the village lacks a primary school. The proposed site is bordered on two sides by housing, and whilst the landscape is flat and open, there is potential to integrate any new development with the existing built form of the village, and through good design establish an attractive edge to the village.

In conclusion, it is not considered that the village should accommodate both sites as a whole, but that a proportion of each site should be allocated, with an indicative target of 50 houses on each site.

Proposed Change

Allocate for no more than 50 dwellings.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0003	Site Proposal	Policy	19	
004		Trustees of ME Coulston	A001	
Detail	0.29 HA Land off the B6263 @ Cumwhinton put forward for consideration for future residential development			
Response	The site could be developed to a point no further north than the rear boundary of 14 Beech Tree Farm. It would need to be developed with the adjacent site. Although the land is open, it is in a central location within the village, has good access, and development could be sensitively designed to enhance the central part of the village, but protect the open landscape on higher ground to the north. Some support as part of Cumwhinton Rural Master planning exercise for development in the centre of the village.			
Proposed Change	Allocate with adjacent site for 20 houses.			
0173	Site Proposal	Policy	19	
064	Messrs Osgood		A009	
Detail	My client owns land in the centre of Wreay [map enclosed] which they wish to be allocated in the Plan as a replacement for WREA1. It is considered that the allocation of some of the land would be more suitable as: <ul style="list-style-type: none"> - allows an opportunity for land to be brought forward in a sensitive manner that fully respects, and does not compromise, the setting and historic character of Wreay - is well related to the village - could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties - complies with the thrust of the policy objectives contained within the NPPF 			
Response	Wreay is a village of less than 30 houses. However, it benefits from a range of local services including a pub, primary school, church and village hall. 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 this site is far greater than of the preferred options allocation to the west of the primary school.			
Proposed Change	None. Do not propose to allocate this site.			
0361	Comment	Policy	19	
088	Elizabeth Allnutt	Save Our Streets		
Detail	If Housing is developed in a number of locations, other than those specifically allocated, this should not be achieved by destroying existing good quality housing for presumed causes such as economic development. Housing Strategy and Delivery. Mixed and sustainable communities – like Rickergate - are good places to live – highly preferable to expensive housing enclaves.			
Response	One of the 12 core planning principles in the NPPF, (that should both underpin plan-making and decision-taking) is as follows: "promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas". The Plan does not seek to demolish existing good quality housing.			
Proposed Change	No change to the Plan in response to this comment.			

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

0175 Objection Policy 19

065 Messrs Parker, Brown, Owens and A014

Detail SHLAA Site TH 03 - Land at Field House, Thurstonfield
Wish to have the site re-considered in light of comments made about this proposed site in the earlier sieve do not stand up to examination:
Approach road; Would lead to more adjacent development; Lack of Local Services; 'Distant from Carlisle'; Thurstonfield not being a sustainable location. All these points are expanded on within the submission.

Response Thurstonfield could be described as being in a cluster with Burgh by Sands, Moorhouse, Great Orton, and Kirkbampton (which lies in Allerdale District). These villages between them provide primary schools, pubs, village halls and churches. Thurstonfield itself has no services, although there is a small Methodist Chapel. As part of the rural masterplanning process, a focus group meeting with the parish council identified that there was probably no need to allocate additional land at present within Thurstonfield. However, the City Council considers that as the Plan covers a 15 year time period, it may be necessary to allocate a small site now to accommodate some new housing over the Plan period. A number of comments received in response to the first phase preferred options consultation objected to the Plan having made no allocations in villages west of the CNDR, and therefore not taking advantage of improved transport infrastructure. There are presently approx 100 houses in Thurstonfield, and it is considered that a modest 10% increase over the Plan period could be accommodated. The preferable site is located at Hill Farm, to the west of the village.

Proposed Change No change to policy in response to this objection.

0183 Objection Policy 19

066 Revd. Canon Jan Kearton The Governing Chapter of Carlisle C

Detail The Chapter understands that this Policy provides the housing requirement to meet the Council's growth point target of 119,000 residents by 2025. To this end, perhaps, the consultation limited comment to a maximum of 600 houses per annum. Given the current shortfall between planned housing and actual build, we wonder whether this target is sufficiently ambitious to achieve the growth point, to address deprivation in the southern wards, to both halt decline and generate the increased employment that the report looks for. We understand the importance of the identification of preferred sites and know that the 420-450 houses that are currently completed are selling well. Whilst no-one would wish to see excessive supply and resultant depression of the market, we would encourage the City Council to be ambitious in seeking to fulfil their vision. Human flourishing depends upon good housing, secure employment and healthy living and deprivation can successfully be impacted by high quality education and the development of aspiration. It would be helpful to know whether the City Council anticipates continued expansion beyond the life of this report or whether the strategic vision is of a single period of expansion followed by consolidation.

Point 4 - We are glad to see that the ageing demographic of the population is addressed and would urge the Council to develop imaginative schemes for all forms of assisted housing and, where appropriate and safe, to plan for developments that encourage community access to facilities such as cafes and small shops in the accommodation in order to prevent the isolation of the aged.

Response A more ambitious housing target has been identified in Policy 19, to reflect the growth based scenario in the HNDS of 665 houses per year.

Proposed Change Policy 19 amended to reflect overall District target of 665 houses/yr.

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

0189 Site Proposal Policy 19

069 Client of Taylor & Hardy Ref: MEH/JJ/C13/059 A004

Detail Land at Rockcliffe - Sites A, B, C.[maps, indicative layout, Highways Aspect Report and Flood Risk Aspect Report attached]
 The site(s) identified are:
 - well related to the landscape of the area and do not intrude into open countryside
 - of a layout and form of development which is well related to the form and character of Rockcliffe
 - of a layout which is well related to existing property in the settlement
 - provides for appropriate highway improvements, access and parking
 - does not result in the loss of amenity open space within or at the edge of Rockcliffe

Response Sites A and B lie within Flood Zone 2, (medium probability) as identified by the Environment Agency Flood Map and the Council's Strategic Flood Risk Assessment (2011). The NPPF states that Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property...by...applying the sequential test. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the development in areas with a lower probability of flooding. A sequential approach should be used in areas known to be at risk from any form of flooding. The geographical area over which the test is to be applied is the whole of the District of Carlisle City Council. The source of 'reasonably available' alternative sites has been drawn from the evidence base that has been used to inform the emerging Local Plan, the Strategic Housing Land Availability Assessment (SHLAA), and any subsequent updates. Local Plan Policy 19, table of allocated sites identifies sufficient land for housing to meet the objectively assessed need for housing within the District. Site C is a three hectare site which extends around the south eastern boundary of the village. The southern approach to Rockcliffe is very distinct in that there is a physical and visible defined edge to the village, approximately coinciding with the road sign for the village. This site can not be said to be integrated with the village form, and would represent an extension into open countryside. There is currently no footway until a point opposite the memorial hall. The Local Plan allocates sufficient land for housing to meet the objectively assessed needs of the District.

Proposed Change None. Do not proposed to allocate these sites.

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

0195 Objection Policy 19

070 Mr R Coad 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 rural areas. The housing target should be exactly that; a target, not a capped figure. It is therefore proposed that criterion 1 of Policy 19 should be amended to read "Contribute to achieving an average annual district housing target of 650 houses per year"; deleting reference to 550 dwellings. This will ensure that the policy is in accordance with the NPPF and the need to 'significantly boost housing development' in the district. This amendment should be incorporated into Policy S2 'Spatial Strategy' at bullet point 1 as previously set out above in respect of our comments to Policy S2.

Furthermore, in association with criterion 2 of Policy 19, we support the change proposed to the 'Development split' between the urban and rural areas, compared to what it is currently set out at in the existing Local Plan. The existing Local Plan states at Policy H1 that "During the Plan period 80% of new development will be located within the urban area of Carlisle, including allocated sites on the edge of the City referred to in Proposal H16. The remaining 20% will be permitted in the rural area of the District with the focus on the two Key Service Centres of Brampton and Longtown". The change to a ratio of 70:30 is welcomed. Notwithstanding the above, for Policy 19 to be found sound and to be effective and flexible, it is proposed that the following text should be inserted at the beginning of the criterion: "seek to achieve 70% of all new housing development in the urban area..." and, as set out above, it is considered that further clarification as to what defines the urban area to the rural area is needed before the policy can be fully supported, particularly as development limits are proposed to be removed from the smaller towns and larger villages.

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 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. It may also be beneficial to have a definition of small and large scale sites included within the plan.

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.

Finally, in respect of criterion 5 set out in Policy H19, to ensure that deliverable sites are allocated for development the Council should not over rely on brownfield sites, particularly in the short term. As set out in paragraph 5.3 of the document, the number of brownfield sites available for development is diminishing. In addition, brownfield sites will take time to be delivered and completed and viability is often marginal. On this basis, adequate greenfield sites (throughout the district, not just in Carlisle) must be allocated to ensure the development need and demand for the entire district is met, particularly housing development.

Response

Policy 19 has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period. The Policy does not read as if this is a capped figure. Agree that 'seek to achieve' would add greater clarity to criterion 2.

The Housing Topic Paper, which will be produced for the publication stage of the Local Plan, will outline how housing numbers are calculated. Nursing homes and student accommodation, unless self contained flats, are not currently calculated in housing supply figures. The Council does not place over reliance on brownfield sites, and has an excellent track record of brownfield sites being developed in the City. Sufficient greenfield sites have been allocated, as can be judged from the list of sites in Policy 19.

Proposed Change

Criterion 1 amended to set district housing target of 665 dwellings/year.
'Seek to achieve' added at start of criterion 2 of Policy 19.

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

0086 Objection Policy **19**

036 Client of Taylor & Hardy Ref: MEH/JJ/C11/060 A004

Detail [SHLAA Site DU 03 Land at Durdar Farm] My clients object that the site is not referred to or identified as a site suitable for residential development. They are very concerned that the suitability of the site, as set out in the SHLAA, for residential development has not been identified in the Draft Local Plan. It is considered that this objection ought to be addressed by the allocation of the land for residential development.

Response The site lies in the broad location of Carlisle South, which is identified in Policy S3. The policy states that the development of this area will be in accordance with a masterplan which will be approved as a supplementary planning document. The proposed uses will include housing, schools, local employment and retail sites, community facilities, open space and other infrastructure.

The purpose of the masterplan will be as follows:

- to provide more detail on how the strategic requirements set out in this policy will be delivered;
- to set a framework to guide the preparation of future planning applications;
- to provide a framework against which future planning applications will be assessed.

It is therefore important that sites in this area do not come forward in isolation, as this would jeopardise the opportunity to comprehensively shape the physical form and social fabric of an area to create a sustainable place in an area-based as opposed to piecemeal approach.

Proposed Change No change to policy in response to this objection.

0274 Objection Policy **19**

076 David Gittins

Detail I believe there is a proposal to build on the field behind Hurley Road and subsequently extend the current 3 cul de sacs. As a resident of Hurley Road I attach a list of objections and problems that such a proposal would cause. I cannot find the plan that refers to these proposals to make my objections there so I am sending them directly to you.

The objections relate to Impact on roads in the vicinity and impact on the cul-de-sacs.

Response The proposed housing site will be accessed directly from Little Corby Road. The potential to create safe routes for walkers and cyclists will be explored, including through the Hurley Road cul de sac if appropriate.

Proposed Change No change in response to this objection.

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

0287 Objection Policy 19

077 Mr Alan Hubbard National Trust

Detail There are a number of general, and one specific [see rep 0288], concerns about the approach taken to the provision of new housing development. The elements that are lacking in the approach are considered to be:

- The basis for the 70/30 urban/rural split and 'need'
- The comparative sustainability of different locations
- The assessment of the environmental impacts of development

It is unclear why a 70/30 split is appropriate – the fact that this is approximately the existing split does not mean that it is right or wrong in terms of where new housing should be directed towards. What are more important are the matters of housing need and the sustainability of potential locations. Clearly there are unmet needs in the rural parts of the District and the Local Plan should ensure that these are addressed in as sustainable a manner as possible, but it is unclear that 165 to 195 units are needed each year of the plan period in the rural areas. In the absence of a detailed assessment to confirm this level of provision in the rural areas (on a settlement by settlement basis) it also unclear that the level of provision proposed in the rural areas is the most sustainable distribution of development – as noted in the representations reported “Many responses favoured a higher proportion of houses in the urban area due to access to services and community facilities, to take up opportunities for regeneration and to prevent negative impact on the character of rural areas”.

National Trust is not aware, at the individual settlement level, what assumptions have been made about the ability of those settlements to accommodate the amount of development proposed in the context of matters such as local employment opportunities, school places, GP services and the like.

It is also unclear how sites have been assessed in terms of the impact of development upon environmental assets – specifically landscape character, nature conservation and heritage.

- Give further consideration to the split of housing provision between the urban and rural areas.

Response The 2011 HNDS states that within the District, the ONS mid-year population estimates (for 2009) suggest that some 8,200 people lived in the Rural West area, 25,800 in Rural East with the majority (70,700) living in the main Carlisle urban area. This approximates to 70% in urban Carlisle, and 30% in the rest of the rural area. Feedback up until this point in the Local Plan process has pointed to the current population split which is approximately 70/30% urban/rural, and that this should mirror the proposed housing distribution to avoid any reduction in new builds in the rural area. Many responses favoured a higher proportion of houses in the urban area due to access to services and community facilities, to take up opportunities for regeneration and to prevent negative impact on the character of rural areas.

The NPPF does not specify a settlement hierarchy approach to housing development in rural areas. It states that LPAs should be responsive to local circumstances and plan housing to reflect local needs. Housing should be located where it will enhance or maintain the vitality of rural communities. This is interpreted as being about more than local services and facilities within a village, and extending to such things as housing for new families within a village, diversifying the age range of residents of a village, allowing young families to build a home in a village where they have connections, or allowing housing to meet a special need in a village where the occupiers have local connections - socially sustainable development, as well as economically sustainable. If housing is only allowed in villages with a defined level of services, all the other villages will fall into a sustainability trap, and fail to thrive.

Sites have been assessed against a number of criteria including biodiversity, landscape, heritage, flooding, access issues etc.

Proposed Change Justification to Policy 19 amended as follows:
Paragraph 5.11 - second sentence added, "The HNDS states that within the District, the ONS mid-year population estimates (for 2009) suggest that some 8,200 people lived in the Rural West area, 25,800 in Rural East with the majority (70,700) living in the main Carlisle urban area. This approximates to 70% in urban Carlisle, and 30% in the rest of the rural area. As such, Policy 19 seeks to achieve 70% of the housing target to be delivered in urban Carlisle, and 30% in the rest of the District (the rural area including Brampton and Longtown)".

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0325	Objection	Policy	19	
081		HS Cartmell	A013	
Detail	<p>It is vital that the Local Plan housing strategy meets the housing needs for the district for both the City of Carlisle and its rural areas. The housing target should be exactly that; a target, not a capped figure. It is therefore proposed that criterion 1 of Policy 19 should be amended to read "Contribute to achieving an average annual district housing target of 650 houses per year"; deleting reference to 550 dwellings. This will ensure that the policy is in accordance with the NPPF and the need to 'significantly boost housing development' in the district. This amendment should also be incorporated into Policy S2 'Spatial Strategy' at bullet point 1, as previously set out above in respect of our comments to Policy S2 [see Rep 0321]</p> <p>Notwithstanding the above, for Policy 19 to be found sound and to be effective and flexible, it is proposed that the following text should be inserted at the beginning of the criterion: "seek to achieve 70% of all new housing development in the urban area..." and, as set out above, it is considered that further clarification as to what defines the urban area to the rural area is needed before the policy can be fully supported, particularly as development limits are proposed to be removed from the smaller towns and larger villages.</p> <p>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 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. It may also be beneficial to have a definition of small and large scale sites included within the plan.</p> <p>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 District.</p> <p>Finally, in respect of criterion 5 set out in Policy H19, to ensure that deliverable sites are allocated for development the Council should not over rely on brownfield sites, particularly in the short term. As set out in paragraph 5.3 of the document, the number of brownfield sites available for development is diminishing. In addition, brownfield sites will take time to be delivered and completed and viability is often marginal. On this basis, adequate greenfield sites (throughout the district, not just in Carlisle) must be allocated to ensure the development need and demand for the entire district is met, particularly housing development.</p>			
Response	<p>Policy 19 has been amended to state a District wide target of 665 houses/yr, plus a backlog of 893, spread over the Plan period. The Policy does not read as if this is a capped figure. Agree that 'seek to achieve' would add greater clarity to criterion 2.</p> <p>The Housing Topic Paper, which will be produced for the publication stage of the Local Plan, will outline how housing numbers are calculated. Nursing homes and student accommodation, unless self contained flats, are not currently calculated in housing supply figures. The Council does not place over reliance on brownfield sites, and has an excellent track record of brownfield sites being developed in the City. Sufficient greenfield sites have been allocated, as can be judged from the list of sites in Policy 19.</p>			
Proposed Change	<p>'Seek to achieve' added at start of criterion 2 of Policy 19.</p>			

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

0326 Site Proposal Policy 19

081 HS Cartmell A013

Detail Land off Edmondson Close [SHLAA BR 10]
 We disagree with the Council's preferred option for addressing housing need and demand in Brampton. It is considered that the sites identified on page 261 - 262 of the consultation document, are not the most suitable, achievable or deliverable site in Brampton.
 We suggest our clients land (Site BR10) as identified on the attached plan should be reassessed and allocated for housing development during this plan period.
 Further detail as to why this amendment should take place is given including an assessment by WYG Transport.

Response Highly attractive landscape area on the edge of Brampton. Rolling topography with prominent knoll topped by ring of mature beech trees. Access severely constrained. Other preferable sites exist. Site sits considerably above housing to the west in Tree Gardens, Tree Road and Tarn Road. Development would have an unacceptably overbearing effect on these properties and the landscape.

Proposed Change No new allocation in response to this site proposal.

0346 Site Proposal Policy 19

086 FE & MJ Crozier

Detail Map enclosed at Warwick Bridge - Field No's NY 4756 7992 0.54 HA; NY 4756 8084 1.80 HA; NY 4756 8990 0.18 HA; NY 4856 0391 2.45 HA;
 I would like the area to be put on the plan for possible development for houses. The area is just opposite the new development for the Co-op and residential flats.

Response Both sites are crossed by Cairn Beck with resulting flooding issues. The site immediately east of Low Buildings is important in landscape terms when viewed both from the access road to the Warwick Mill Business Park, and from the A69. The views from the A69 are especially prominent, extending to the North Pennines AONB in the east. Highways access to this site is severely constrained. The site which lies to the south of the Corby Hill to Heads Nook road is not well related to the rest of the village. The site extends out into the open countryside, where both the physical and visible perception is that of being outside the village. The current allocated site in the Preferred Options is a preferable site.

Proposed Change No new allocation in response to this site proposal.

0538 Site Proposal Policy 19

113 Mr & Mrs Wilkinson A009

Detail Land at Brookside House, Thurstonfield: my client objects to the exclusion of their land from the list of sites allocated for residential development.

Response Half of the site is occupied by a house, an outbuilding and an established small builder's yard. 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.

Proposed Change No new allocation as a result of this site proposal.

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

0088 Site Proposal Policy 19

038 Messrs Martin A009

Detail My client objects to the exclusion of the 2 parcels of land on the western side of Moorhouse which are identified on the enclosed plan as site 1 & 2 in their ownership. They confirm that the land is available to be developed and would like to see this land brought forward for housing development. A list of reasons as the suitability of the site is attached.

Response 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.

Proposed Change None. No new allocation as a result of this site proposal.

0527 Site Proposal Policy 19

108 Mr A McCumiskey A018

Detail As no housing land allocations have been made for the settlement of Moorhouse which is a reasonable significant settlement with a range of services and facilities, a site is proposed - Land at Monkhill Road [map enclosed]

Response The village has a very limited level of services, including a public house, a private former Quaker burial ground, two small area of open space, and a post box. However, the village is part of a cluster of villages including Thurstonfield, Monkhill, Great Orton, Burgh by Sands and Kirkbampton (this last village in Allerdale District). There are primary schools at the latter three villages, with the Burgh by Sands school operating at approx half its capacity. Some housing at Moorhouse could help sustain services in this village cluster, in line with paragraph 55 of the NPPF.

Proposed Change The site is centrally located within the village, and has the potential to provide a mix of housing of a scale appropriate to the village. There are approx 70 properties in Moorhouse, therefore an additional 10 houses would be an appropriate number. Site allocated for 10 houses.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1126	Comment	Policy	19	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Excluding existing primary employment areas, land allocated for employment development follows the long established pattern of being primarily situated in the north of the urban area despite the majority of housing being to its south.</p> <p>This imbalance generates heavy traffic flows across the city, along with all their attendant undesirable effects - especially at peak times. The Local Plan should seek to re-balance the city through the re distribution of employment sites with the emphasis being on the south and west of the city.</p> <p>There does not appear to be any allocation of sites, of any sort, west of the CNDR, thus denying this area access to the same levels of socio-economic investment potential enjoyed by other parts the city.</p> <p>The CNDR junctions, especially those south of the River Eden, provide opportunities for targeted local development which seem to be largely overlooked by the Draft Local Plan, despite their mention in consultation responses.</p>			
Response	<p>Employment areas to the north of the city, and those at Junction 43 of the M6, are easily accessed from the south and west of the city by either the M6, or the Carlisle western bypass. Policy 1 seeks to encourage employment uses along the M6 corridor as a whole.</p> <p>West of the CNDR is largely open countryside, and the Plan would not seek to allocate sites that are physically and visibly separated from the rest of the City. There are large tracts of line west of the CNDR which lie within Flood Zone 2.</p>			
Proposed Change	No change to policy in response to this objection.			
0004	Site Proposal	Policy	19	
004		Trustees of ME Coulston		A001
Detail	5.15 HA Land North of Cumwhinton behind land in rep 0003 put forward for consideration for future residential development			
Response	<p>The site could be developed to a point no further north than the rear boundary of 14 Beech Tree Farm. It would need to be developed with the adjacent site. Although the land is open, it is in a central location within the village, has good access, and development could be sensitively designed to enhance the central part of the village, but protect the open landscape on higher ground to the north. Some support as part of Cumwhinton Rural Master planning exercise for development in the centre of the village.</p>			
Proposed Change	Allocate with adjacent site for 20 houses.			

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

0971 Comment Policy 19

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail

The policy states that 30% of all new housing developments will be in the rural areas. The allocations allow for 881 new units - over 50% in Brampton, 25% in Wetheral Parish & 12% in Longtown & the remainder in the rest of the rural area.

This is not a cohesive long-term strategy for suitable rural communities. 30% of the 881, approx 240 units, will be affordable units and need to be spread about the district and built in small communities that need them, not predominantly in 3 areas.

There is no indication that there will be any significant infrastructure implemented in these areas. Brampton had already had a number of estates developed, none of which provide any amenities for residents, such as corner shops, pubs etc. The centre of the town has become very congested due to insufficient parking.

5.4 mentions housing for the elderly - this is needed in all communities and yet there is no provision.

5.10 mentions creating sustainable, inclusive and mixed communities, how can this be possibly be achieved?

5.11 States the housing target is based on a housing needs and demand study (HNDS). This was not carried out in each rural community, instead a certain percentage of communities were selected which was not necessarily representative.

A review is required in every village; the housing strategy excludes a large number of small rural communities. The draft plan should be revised to include all of these communities in order to enable developers to build small developments which include housing for the elderly and affordable rental in perpetuity. Housing needs and demand survey is required in all rural communities.

The consultation clearly states (item D p. 100) that smaller villages should be included as suitable locations for development yet very few of them have allocated sites, these should be included.

Response

The housing figures for Carlisle aim to achieve a 70:30, urban: rural split. There is no prescriptive percentage allocated for housing in centres as suggested. The Plan is currently being reviewed in response to comments received and advice provided by an independent inspector. As a result there will be an increase in the housing target to 665 homes per year to support the forecast economic growth from the Housing Needs and Demands Study. The Plan allocates sites that will contribute 881 homes in the rural area with an increased housing target this figure will be higher and therefore lead to a greater number of affordable homes being delivered. Policy 22 specifically deals with affordable housing and this policy would cover the entire District.

Infrastructure will need to be proven to support future development and Policy 33 specifically deals with infrastructure. Evidence on infrastructure is currently being prepared as part of the Infrastructure Delivery Plan that will inform the Plan.

New developments in Brampton help contribute to the vitality and vibrancy of the centre and retain services and local facilities. Parking in the centre of Brampton is an issue that would be considered with policy 35.

Point 4 of Policy 19 addresses the point made.

The latest ONS mid-year population estimates show that there were 104 500 in the District mid 2010. Of this figure, 70 700 were living in the Carlisle urban area, and the remaining 34 000 in the rural west and rural east areas. This is an approximate split of 70% in the urban area and 30% in the rural area. As such Policy 19 makes provision for 70% of all new housing development to be delivered in the urban area and 30% in the rural area. There are not the resources available to carry out a housing needs survey in every village. Policy 19 is not the only policy that makes provision for housing development. Policy 20 enables housing development on sites that aren't allocated, and historic windfall monitoring shows that up to 100 new dwellings a year are achieved this way. Policy 20 is written in such a way as to allow housing in small rural communities where such development would maintain the vitality of the community.

The age profile for Carlisle District is slightly older than found regionally or nationally, with a greater proportion of people in all age groups from 45 onwards. Within the rural area there is a much larger proportion of people aged 45 and over than in the urban area. Nearly 30% of the population of each rural Housing Market Area (HMA) is aged 60 or over. Cumbria County Council have produced an 'Extra Care Housing Strategy 2011-2029', which identifies that 340 extra care units are required in the district up to 2019. There will be continuing dialogue with the County Council on how this can be delivered.

Currently criterion 4 of Policy 19 makes reference to specialist housing for vulnerable people. However, Policy 30 also makes provision for housing for those with special needs. For clarification, there will be a single policy (Policy 30) dealing with this issue.

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

A key element of the Nov 2011 HNDS was an assessment of both current and future affordable housing need. The most recent practice guidance on how to do this is contained in the CLG SHMA Guidance of August 2007. This states that it can be difficult to obtain a complete and robust estimate of current housing need including any backlog due to data limitations. Traditionally local surveys have been used although they can be costly to administer and difficult to interpret. Annex C of the guidance provides advice on undertaking household surveys. The 2011 HNDS followed this guidance. 10 000 survey forms were sent out and a total of 2581 were completed and returned. Paragraph 18 of the practice guidance states:

'A common misconception when sampling is that it should be based on a certain percentage of the population being studied. In fact, it is the total number of cases sampled which is important. As the number of cases increase, the results become more reliable but at a decreasing rate... Approximately 1,500 responses should allow a reasonable level of analysis for a local authority area'.

The Council does not have the resources to carry out village level surveys across the district. However, such surveys could be encouraged through the neighbourhood planning process, or through community plans. Dalston Parish Council has recently undertaken a parish housing needs (Sept 2013) survey using Cumbria Rural Housing Trust.

The HNDS identifies the district wide need for affordable housing. Local surveys can identify more detailed local need at a given point in time within a parish. They will be encouraged through neighbourhood or community led plans.

Proposed Change Increase the housing target to 665 homes per year to support the forecast economic growth from the Housing Needs and Demands Study.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0941	Objection	Policy	19	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	<p>District Housing Target: This probably applies well to the District as a whole, but cannot be extrapolated to an individual parish, hence the need for Dalston to do a new Housing Needs Survey.</p> <ol style="list-style-type: none"> 1. It is noted that Dalston has already achieved its share of this target. We require confirmation that the 121 houses already approved is the Dalston allocation for the life of this plan, therefore we would like the Dalston allocation adjusted by the removal of the land at Buckabank. 2. We would prefer that the rural allocation was reduced to the previous figure of 25% to reduce pressure on the rural areas. 3. Identified local housing need should take into account the most recent housing needs survey of that location. 4. Every planning application should be looked at according to its own merits. 5. Give more weight to this part of the policy and reflect the historic and industrial heritage of the site through high quality of design. 			
Response	<p>The district housing target is based on evidence in the HNDS. There is no requirement to extrapolate it to individual parish level. The population of the district is 104 700. This is split into 8 200 in the rural west area, 25 800 in rural east and 70 700 in Carlisle urban area. Therefore the urban/rural housing split more accurately reflects the population split, and has received support through the consultation process, with many of the community in rural areas welcoming the opportunity for more housing. Village level surveys of housing requirements are not a requirement. The NPPF states that LPAS should use a 'proportionate evidence base'. The Strategic Housing Market Assessment practice guidance states that, "A common misconception when sampling is that it should be based on a certain percentage of the population being studied...in fact ...approx 1 500 responses should allow a reasonable level of analysis for a local authority area". Planning applications are assessed against policies in the adopted Local Plan, the NPPF and other material considerations. There is a separate design policy, together with design policies in the NPPF.</p> <p>The site of the recent planning permission on land between Townhead Road and Station Road for 121 houses has become the preferred allocation for Dalston, and the land at Buckabank deleted.</p>			
Proposed Change	Allocation at Buckabank for 15 houses deleted.			
0048	Site Proposal	Policy	19	
021		Harrison Northern Ltd		A004
Detail	<p>Land to the south of Chertsey Mount, London Road, Carlisle - object to its exclusion from the list of sites allocated under Policy 19 for residential development. Wish to bring this land, which is in a very sustainable location; is not visually prominent and within the built up area of Carlisle, forward for housing. The allocation of the land for housing in the Local Plan 2015 - 2030 would be wholly appropriate.</p>			
Response	<p>This is a flat, greenfield site accessed from Tree Road, and adjacent to another preferred allocated site to the rear of the Hilltop Hotel. Whilst Tree Road and Tyne Street are narrow at this point, there is potential for highway improvements to serve the increase in traffic. The site is close to local services including public transport.</p>			
Proposed Change	Allocate site for 20 houses.			

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

o868 Site Proposal Policy 19

176 Philip C Smith (Commercials) Ltd Aoo4

Detail Land South of Park Road, Durranhill, Carlisle: My client objects to it's exclusion, either in part or as a whole, from the list of sites allocated under Policy 19 for residential development.
My clients wish to bring this land forward for housing, as the site is in a sustainable location, its allocation for housing would be wholly appropriate.
In support of the allocation it is highlighted that in the period since May 2007 there have been constructive and positive discussion on the highway/access aspects of a development on the site. [names of County Council Officer with whom discussions have taken place given] It is understood that on 3 separate occasions, July and September 2008 and January 2011, this information has been provided to the LPA and has clearly and unambiguously stated that the access to the site is wholly suitable for traffic on a shared surface road, associated with a development of 30 houses or equivalent being: a nursing home (82 bed); 114 units of sheltered accommodation; 147 retirement flats.

Response Access to the site is severely constrained, especially for emergency vehicles. Unless evidence is provided to indicate otherwise, do not propose site for allocation.
Proposed Change No new allocation in response to this site proposal.

o818 Comment Policy 19

160/35 Mrs Catherine Leach Clerk to Bewcastle Parish Council

Detail The Council felt that more emphasis should be placed on the provision of solar panels on all new developments.

Response Policy 43 seeks to ensure that all new development has energy conservation and efficiency measures included. Solar panels are one such measure. Paragraph 7.33 states that applicants will be expected to demonstrate how they have attempted to minimise energy loss ... through careful and imaginative design, location and construction techniques. This policy will therefore be used to ensure new development promotes energy efficiency and sustainable sources of energy supply. Therefore it is not intended to replicate this in Policy 19.

Proposed Change No change to policy in response to this comment.

1109 Objection Policy 19

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail This policy should include advocating a preference for developments to the west and south of the city, in order to maximise the opportunities offered by the new CNDR with regard to enhancing the sustainability of settlements in those areas.

Response The Plan will not seek to allocate housing sites in the open countryside to the west of the CNDR as they would be physically and visibly separated from the rest of the City. Large tracts of land in this area lie within Flood Zone 2. There are a number of allocations to the west of the city including Carl 6, 7 and 8. This makes provision for 714 houses. In addition, there is a committed approval at Morton for 825 units.

Proposed Change No change to policy in response to this objection.

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

0042 Objection Policy **19**

021 Harrison Northern Ltd A004

Detail Object to the exclusion of Land at Hilltop Heights, London Road, Carlisle from the list of sites allocated for residential development as it is allocated in the current Carlisle District Local Plan 2001 - 2016 and ought to be retained.

Response Site has been included in allocations in Policy 19.
The monitoring framework which is now included in the Plan indicates that if allocated sites do not come forward for development within the Plan period, the Council will first approach the site promoter to identify the constraints to development, and ultimately delete the site if other preferable deliverable sites are available.

Proposed Change Land at Hilltop Heights included in site allocations in table in Policy 19.

0760 Support Policy **19**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change

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

1005	Objection	Policy	19	
194	Michael Barry	Cumbria County Council		
Detail	<p>Background information submitted. Suggested Changes:</p> <ul style="list-style-type: none"> - The policy should highlight the contribution of the broad location at South Carlisle to the Local Plan's housing requirement. - The Local Plan should look to manage the implementation of the 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) to achieve the average annualised dwelling requirement for 600 homes per annum (or 9,000 dwellings over the plan period). - The Local Plan should provide a clearer basis for the windfall allowance proposed within the Local Plan. - The City Council need to ensure sufficient housing land is identified to meet the requirements of the rural areas over the plan period. - The area of playing fields at Lochinvar School (LONG1) that are subject to a long lease and are to be retained in recreational use should not be allocated for housing development. The remainder of this site should be allocated for housing development. - Sites CARL3 and CARL9 should not be allocated for housing development. - Sites CARL2 and CA12 should be allocated for housing development. - The site specific advice submitted should also be noted. 			
Response	<p>A separate policy has been written to make provision for Carlisle South as the broad location for growth 2025-2030. This policy will be in the Spatial Strategy and Strategic Policies section. For clarity there will also be a separate sentence added after criterion 5, which highlights the contribution Carlisle South is expected to make to housing delivery.</p> <p>A housing trajectory has been drafted which illustrates the expected rate of housing delivery. This takes into account current market conditions and therefore shows a lower expected rate of growth at the beginning of the Plan period. This will be an appendix in the Local Plan.</p>			
Proposed Change	<p>New strategic policy for Carlisle South in 'Spatial Strategy and Strategic Policies' section of the Plan.</p> <p>Housing trajectory included as an appendix to the Local Plan.</p> <p>Housing table in Policy 19 amended to take account of new information on sites Long 1, Carl 3 and 9.</p>			

0085	Support	Policy	19	BRAM4
035	Client of Taylor & Hardy	Ref: MEH/J/C12/050		A004
Detail	<p>My clients are pleased that this allocation has been made and confirm that they are able to bring the site forward for residential development in the near future.</p>			
Response	<p>This response to be included in summary of responses to show deliverability of site.</p>			
Proposed Change				

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

0140 Support Policy **19** CARL1

061 Mr Stephen Prince Cumbria NHS Partnership FDN Trus A012

Detail Support the allocation of CARL 14 for housing development

Response Support noted.

Proposed Change

0087 Support Policy **19** CARL6

037 Client of Taylor & Hardy Ref: MEH/J/Co8/077 A004

Detail My clients are pleased that this allocation has been made and confirm that they are able to bring the site forward for residential development in the near future.

Response This response to be included in summary of responses to show deliverability of site.

Proposed Change

0089 Objection Policy **19** Dalston Alternative

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

Detail My clients are wholly confident that there are no constraints which would prevent the site, which is well related to the form and character of the settlement, being brought forward for development and it is this context that my clients object to Policy 19 as the land at Dalston - Dalston Alternative Option DA01 has not been allocated for residential development

Response The land between Townhead Road and Station Road has planning permission for 121 houses, open space and associated infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. This site is in a preferable location to the Dalston alternative option DA01. DA01 is located in a prominent position in open countryside. The site is elevated slightly above the road known as The Green. There are also extensive open views across the site from the eastern end of Townhead Road in a southerly direction to the Lake District. United Utilities have indicated that the development goes ahead it will take up all of the available headroom at the Dalston Wastewater Treatment Works.

Proposed Change No change to policy in response to this objection.

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

0136 Support Policy 19 ROCK1

057 Client of Taylor & Hardy Ref: MEH/JJ/C13/057 A004

Detail My clients are pleased that this allocation has been made and confirm that they are to bring the site forward for residential development in the near future.

Response This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:
 "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.
 Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".

Proposed Change Site deleted from Policy 19 as a preferred allocation for housing development.

0172 Objection Policy 19 WREA1

064 Messrs Osgood A009

Detail My clients object to the allocation of the land west of Wreay Primary School for residential development. Background information as to the character of Wreay is given. Conclusions of an assessment of the site against adopted and emerging Local Plan and NPPF to which 4 points are raised. (see letter of submission for full assessment).

Response Wreay is considered to be a sustainable location for development as it currently supports a primary school with spare pupil capacity, a village hall, a pub and a church, all located centrally within the village. It is approximately 3 miles from Carlisle. Whilst most of the housing is clustered loosely around the central area of the village, there are a number of scattered properties located along the four approach roads which converge within the village. The size of the allocated site and the low site capacity of 10 given in the Plan will allow a development which complements the existing village form, at a density which reflects that of surrounding development. Access to the highway is possible on the northern edge of the site. There are a number of mature trees, and a hedge, between the site and the Grade II* listed church in the centre of the village. Whilst the effect of development on a listed building is a material planning consideration, the NPPF states that local planning authorities should take into account the desirability of new development making a positive contribution to local character and distinctiveness. LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). They should then take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. The mere presence of a listed building is not a reason to stifle development.

Proposed Change No change to the Plan in response to this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0526	Objection	Policy 19	264	Longtown Alternative
106		North Associates		A018
Detail	Land Adjoining Briar Bank, Longtown LO 02 - Should be allocated for housing. Comments regarding one site only at Longtown would appear to be unnecessarily restrictive.			
Response	Longtown is the third largest settlement in the District, with a population of around 3000. It has a good range of local services and facilities, and is the location for C and D Auction Mart, which is the largest centre in the UK for sales of sheep. There are a number of other employment uses associated with the mart within the town. The secondary school closed in Sept 2008. The proposed site lies on the south eastern edge of Longtown, and is less centrally located than the preferred option site, which is on the site of the former Longtown Secondary School. It is also mostly surrounded by open countryside, apart from where it joins housing in Briar Bank. It therefore doesn't integrate well with the existing built form of Longtown. Sufficient housing has been allocated in the settlements in the rural area to meet the local plan housing target.			
Proposed Change	No change to policy as a result of this objection.			
0524	Comment	Policy 19	274	Houghton
106		North Associates		A018
Detail	Land At Hadrians Camp Houghton [HO 03] - should be identified in the Local Plan a mixed use opportunity site in order to maximise its potential.			
Response	Houghton has seen significant expansion in recent years. Planning permission has recently been granted under 12/0610, an outline application for 96 houses. The primary school in Houghton is currently at capacity, as is the next nearest school at Stanwix. The allocation of HO03 would almost double the size of the village. The site is immediately adjacent to the Hadrian's Wall World Heritage Site, and is covered by a non-statutory Wildlife Site designation.			
Proposed Change	No change to policy in response to this objection.			
0525	Comment	Policy 19	274	Houghton
107		Cumbria Constabulary		A018
Detail	Land At Hadrians Camp Houghton [HO 03] - should be identified in the Local Plan a mixed use opportunity site in order to maximise its potential.			
Response	Houghton has seen significant expansion in recent years. Planning permission has recently been granted under 12/0610, an outline application for 96 houses. The primary school in Houghton is currently at capacity, as is the next nearest school at Stanwix. The allocation of HO03 would almost double the size of the village. The site is immediately adjacent to the Hadrian's Wall World Heritage Site, and is covered by a non-statutory Wildlife Site designation.			
Proposed Change	No change to policy in response to this objection.			

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

0024 Objection Policy **19** 91 - 99

011 Terry Jones

Detail The Plan Is Incomplete: The plan does not identify brownfield sites, potential brownfield sites, and derelict buildings, many close to the city centre which could be suitable for redevelopment particularly of housing. An example of a brownfield site might be the former Esso petrol station on Warwick Road, an example of a potential brownfield site would be the site on Shaddongate currently used, maybe without planning permission, by Thomas Graham for the storage of ISO containers full of goodness knows what. A derelict building, now abandoned by the City Council and which it failed to restore after it was damaged in the 2005 floods, is the aircraft hanger on the Willowholme industrial estate.

Response The NPPF removes the previous requirement to set a brownfield target, and there is no longer a national brownfield target. The Government impact assessment for the NPPF noted that:
 "The target to build 60% of England's new homes on brownfield land was introduced in 1999. This centrally imposed target had negative outcomes, resulting in imbalances in housing provision for example between blocks of flats and family homes with gardens. The brownfield target was also seen to drive up land prices in certain areas and would increasingly limit the supply of new housing as stocks of brownfield land are used up, which would harm first time buyers."
 The NPPF now states as one of its 12 core principles that planning should, "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value".
 Historically, building on brownfield sites in Carlisle has taken place at a high rate, and consequently there are very limited opportunities left to do so.

Proposed Change No change to policy in response to this objection.

0325a Support Policy **19** 95

081 HS Cartmell A013

Detail Criterion 2 of Policy 19 is supported. More specifically, the change from 80/20% split urban /rural to 70/30% split urban/rural. This change to the ratio is welcomed.

Response Support noted.

Proposed Change

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

0038	Objection	Policy	19	95
019	Margaret Hardy	Taylor & Hardy		
Detail	Land to the Rear of Croftlands, Heads Nook [SHLAA Ref HN 02] There has been extensive dialogue over the course of the last year or so with the LPA relating to proposals to bring the site forward for residential development. In context of this dialogue which has been very positive I write to object to the exclusion of the site from those listed under Policy H19.			
Response	Application 13/0762 grants outline planning permission for housing on this site subject to the signing of a legal agreement. There is therefore no need to allocate the site for housing in the Local Plan.			
Proposed Change	No change to policy in response to this objection.			

0045	Objection	Policy	19	97
023	Jonathan Coulthard	Cowens Ltd		
Detail	Object that site OC 42 in the SHLAA has not been allocated in the plan for housing. Further information regarding site layout submitted.			
Response	Recent planning permission has been granted in the centre of Dalston for 121 houses. This is considered to be appropriate in terms of size and scale for the settlement and the level of services that it provides. The site is also well located in relation to accessing all local services and facilities on foot. It is not considered that Dalston requires a further housing allocation in order for the Local Plan to meet it's objectively assessed housing targets. United Utilities has also indicated that this development would take up all the capacity at the Dalston waste water treatment works. Ellers Mill lies within Flood Zone 3a. Flood zone 3a is defined as 'high probability'. The NPPF states that local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. The aim of the sequential test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The site also lies within Dalston Conservation Area, immediately adjoins a SSSI/SAC, and is subject to TPOs. The existing means of vehicular access to Eller's Mill is restricted.			
Proposed Change	No change to policy in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0075	Site Proposal	Policy 19	97	WARW1
034	Lucy Adamski			Aoo8
Detail	<p>[link to Rep No 0084] Explicit support for the inclusion of the land at Warwick Bridge (Warw1) as a housing allocation but without prejudice to the phasing representation made in respect of policy S2. [Map enclosed]</p> <p>Given that this site relates very well to the existing settlement pattern of the village, provides a logical extension to support local services et al, does not suffer from any significant risk of flooding, and is the only proposed allocation for Warwick Bridge; allied to the findings of the Preferred Options Sustainability Appraisal, it is considered that the opportunity to incorporate a second phase allocation, with a yield of circa 35 additional new homes, would make eminent sense. The parcel of land in question is indicated on the plan that is appended to this submission and its inclusion is therefore encouraged as housing allocation Warw1a.</p> <p>The inclusion of this second phase allocation as promoted would not give rise to any additional land use matters above and beyond those that have already been considered in the Sustainability Appraisal but would provide controlled additional capacity, choice and flexibility for both market and affordable new homes for a range of lifestyle requirements in accordance with the central thrust of the NPPF in a location that the Plan considers to be sustainable.</p> <p>The proximity of the adjacent Little Corby Hall has been taken into consideration hence the proposal that proposed allocation Warw1a has a modest number of new homes (circa 35) so as to allow an appropriate spatial relationship between the new housing and the hall.</p> <p>Pre-Application Planning Statement rec'd 12/09/13 and placed with submission</p>			
Response	<p>The adjacent site is allocated for 66 houses. There are approximately 320 households in Warwick Bridge. The preferred allocated site represents a 20% increase in the settlement size over the Plan period. It is considered that any further allocation would be out of scale with the settlement. There are likely to be highways issues with any further allocations along Little Corby Road. The adjacent Little Corby Hall Farm is listed Grade II, and this site has the potential to have an adverse impact on its setting.</p>			
Proposed Change	<p>None. No new allocation as a result of this site proposal.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1006	Objection	Policy	20	
194	Michael Barry	Cumbria County Council		
Detail	<p>As per the comments provided in response to Policy S2 [rep No 0985] , it is noted that the proposed Local Plan does not contain a detailed "settlement hierarchy". Instead, while allocating some housing development sites in the larger towns and villages, policy requires that other housing proposals be considered in a flexible way, having regard to the availability of services at a settlement or in other nearby locations, alongside normal considerations around design, amenity and environmental impacts. Such an approach is likely to lessen the understanding of developers, communities and infrastructure providers (like the County Council) about the forms of development that may be appropriate at settlements. It may also lead to development being dispersed in such a way that it does not contribute to the sustaining of key services like schools, shops, post offices and public transport or mean that local people cannot access important services and facilities without access to a private car.</p> <p>Suggested Changes:</p> <ul style="list-style-type: none"> - It is suggested the Local Plan should contain a policy that defines a role for settlements and explains the forms of development that may be appropriate at these. To ensure the flexibility the City Council are seeking to achieve, this policy could also identify clusters of villages that, in practice, share services and where some development would be acceptable subject to standard criteria around design, scale etc.. 			
Response	<p>The previous Local Plan advocated a settlement hierarchy approach. However, the methodology and thinking behind such an approach are now outdated in light of national policy in the NPPF. Paragraph 55 advocates that in rural areas housing should be located where it will enhance or maintain the vitality of rural communities. One example is given, that of development in one village supporting services in a village nearby. The preceding paragraph states that in rural areas LPAs should be responsive to local circumstances and plan housing development to reflect local needs.</p> <p>Policy 20 is intentionally written to widen the scope of locations where housing development will be acceptable in the rural area, and to lift those villages with few or no services out of the 'sustainability trap', whereby under current Local Plan policy no new housing development is allowed unless it is on a rural exception site. The Rural Masterplanning work that has been undertaken in 22 villages that were formerly classed as local service centres was broadly supportive of this approach. The wording suggested by the consultee is considered to be too onerous and would restrict the supply of housing in the rural area. The only change considered is to add a new criterion 1 to more closely reflect the national policy in the NPPF, and to amend criterion 4 for clarity.</p>			
Proposed Change	<p>New criterion 1: "the development promotes the vitality of the settlement".</p> <p>Criterion 4 amended as follows: "in the rural area there are either services in the village where the housing is being proposed (and such services would be supported), or the site has good access to one or more other settlements which have a range of local services and facilities".</p>			

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

1110 Objection Policy 20

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail
 The penultimate paragraph of this policy states:
 "Applicants will be expected to demonstrate how the proposed development will enhance or maintain the vitality of rural communities."
 The ultimate arbiters of vitality of rural communities, or whether its vitality is in need of maintenance or enhancement, must surely be the community itself yet the above policy makes no specific provision for community consultation.
 Policy 20 should be explicit in requiring community consultation on proposals for housing development and in cases where the evidence of a developer is at variance with community opinion the latter should be afforded greater weight.

Response
 Paragraph 189 of the NPPF states that LPAs should "...where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications". In addition, paragraph 66 states: "Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably". It is therefore proposed to add a new paragraph to the justification to reflect the policy requirements of the NPPF.

Proposed Change
 New paragraph inserted in the justification after paragraph 5.20:
 "The NPPF states that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably. As such, applicants will be expected to demonstrate that they have complied with this national policy requirement".
 In addition, the penultimate sentence in the policy is to be amended by the insertion of the words, "through consultation with the local community", after the word 'demonstrate'.

0854 Objection Policy 20

173 Cllr Bloxham

Detail
 Remove item 4 as this will mean the demise of small villages and will not allow them to grow, or provide accommodation for youngsters of the village.

Response
 Criterion 4 is considered to be in compliance with the NPPF which states '...where there are groups of smaller settlements, development in one village may support services in a village nearby'.

Proposed Change
 Clarify criterion 4 - ...'in the rural area there are either services in the village where the housing is being proposed, or in a village or other settlement nearby there is good access to another village with services, or to the larger settlements of Carlisle, Brampton and Longtown'.

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

0327 Support Policy 20

081 HS Cartmell A013

Detail We support this policy, in principle, as it provides the flexibility required to address the housing need and demand throughout the district, in particular, growth in the more rural settlements (rather than just Carlisle). It will provide a wider choice of housing for a greater number of communities.

Response Support noted.

Proposed Change

0761 Support Policy 20

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change

0893 Comment Policy 20

187 Ken Hind Clerk to Kingmoor Parish Council

Detail Concerns regarding policy 20 housing development. Are we going to stick to this as historically things either get changed or revised.

Response All the policies in the draft Plan are drawn up to comply with national policy in the NPPF, but to also reflect local circumstances. The Plan is intended to cover a 15 year time period. Planning policy changes in response to new government guidance, and when local plans become out of date. The Plan will contain a monitoring framework which will assess whether policies are working. There is then scope to review plans in part or in whole.

Proposed Change No change to policy as a result of this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0942	Objection	Policy	20	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	Suitable barriers of green space should always be retained between existing settlements. This ought to be part of Policy 19. We regret the removal of settlement boundaries.			
Response	<p>Settlements merging has not historically been a planning issue in Carlisle District. The identity and character of villages can be protected by ensuring that new development is well designed and integrates well with the existing built form, creating an environment where future occupiers have a strong sense of place and opportunities to integrate with the existing community. The NPPF is silent on the coalescence of settlements, except in relation to Green Belts. The NPPF states that Green Belt serves five purposes:</p> <ul style="list-style-type: none"> ● to check the unrestricted sprawl of large built-up areas; ● to prevent neighbouring towns merging into one another; ● to assist in safeguarding the countryside from encroachment; ● to preserve the setting and special character of historic towns; and ● to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.</p> <p>Therefore they would not be appropriate for designation between settlements in Carlisle District.</p> <p>Settlement boundaries first appeared in the 2008 Local Plan. They were drawn up in response to RPG/RSS policy. They were set at a time of historical and lower levels of housing requirement. RSS has now been abolished, and the housing target for the District is much higher. Settlement boundaries are not supported by the policies set out in the NPPF. Current settlement boundaries are tightly drawn around Carlisle, Brampton and Longtown, and the 20 villages listed in Policy H1 of the Local Plan. This means that there is very little, if any, further scope for development in the future, as Policy H1 largely prevents development outside the boundary.</p> <p>Feedback from various consultation exercises including a number of workshops indicates that there is a level of support for relaxing or removing the settlement boundaries to allow for rural housing development of a scale appropriate to the size of the village, especially where this would help to sustain existing services and facilities.</p>			
Proposed Change	No change to policy as a result of this objection.			

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

0076 Support Policy 20

034 Lucy Adamski Aoo8

Detail Explicit support on the basis of the policy providing appropriate provision for housing development on non-allocated sites.

Response Support noted.

Proposed Change

0362 Comment Policy 20

088 Elizabeth Allnutt Save Our Streets

Detail If housing is proposed for Rickergate, SOS would support the principles in these policies, provided the additional provisos of the Conservation Area apply.

Response Noted.

Proposed Change

0406 Comment Policy 20 103

095 Jenny Hope United Utilities

Detail We would like to highlight the need for these policies to make clear that in order for new housing within rural areas to be considered acceptable, they should be located sustainably and where possible, in close proximity to existing infrastructure unless it can be demonstrated that they can be served by a private solution.

Response Policy 38 states that development will not be permitted unless there is adequate drainage on development sites, for both foul water and surface water. However, where this is not possible, the policy states that alternative on-site treatment methods and septic tanks will be acceptable. It is not considered necessary to repeat this requirement in Policy 20.

Proposed Change No change to policy as a result of this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0504	Support	Policy 20	103	
104	Emily Hrycan	English Heritage North West		
Detail	We welcome the inclusion of criteria, which expects new housing development to relate well to the character of the existing settlement. This would closely reflect the requirements of the NPPF. However, the Plan (as previously mentioned) needs to include a proper and accurate assessment of the whole of the Carlisle district to help inform this policy.			
Response	There is a county wide Landscape Character Guidance and Toolkit which provides a base line of information against which to assess planning applications. There is also the Rural Masterplanning work which has provided a profile of a number of settlements. It is not considered necessary to include a further assessment of the whole of Carlisle within the Local Plan. This would make the Plan cumbersome. Site assessments will be made 'in the field' at the time of a planning application being submitted, using this policy, the above County wide study, and other relevant SPDs.			
Proposed Change	No change to policy as a result of this comment/support.			

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

0198 Objection Policy 20 5.18

070 Mr R Coad A013

Detail
 We support this policy, in principle, as it provides the flexibility required to address the housing need and demand throughout the district, in particular, growth in the more rural settlements, providing a wider choice of housing for a greater number of communities.

However, paragraph 5.18 of the document places restrictions on development in certain settlements. It is therefore considered that the criterion set out in paragraph 5.18 should only be used as an example to identify sustainable locations; it should not be prescriptive. Some settlements, even without all the services and facilities identified in paragraph 5.18 are still suitable and sustainable to accommodate future growth. It is therefore proposed that paragraph 5.18 is reworded to be more in line with paragraph 5.19 and to ensure that there is no misunderstanding when interpreting the policy when trying to accommodate future growth in the more rural settlements of the district. [See Rep 0205 Policy 44]

Response
 Para 5.18 and 5.19 are not separate requirements. The policy and text are meant to be read as a whole. It is clear that the two paragraphs recognise the range of scenarios in the rural area. However, it is considered that 'is close to' in the last sentence of 5.19 is amended to 'and has good access to', as there may be a sustainable location for development which is located on a frequent bus service to, for example, Carlisle or Brampton.

Proposed Change
 Amend paragraph 5.19:
 "It is recognised that within many parts of the rural area it will be difficult to achieve all of the above. The NPPF states that in rural areas LPAs should be responsive to local circumstances and plan housing development to reflect local needs. It goes on to say that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
 The local circumstances for Carlisle District are very specific in that there is a large rural area with many villages scattered throughout. The villages vary in size and the level of services that they support. There are some very small villages which support a primary school, for example Raughton head and Wreay, and some much larger villages with few or no services, such as Brisco and Low Row. There are also a number of primary schools, churches, village halls and pubs which lie entirely outside any recognised village, for example Stoneraise Primary School, and Blackford Primary School.
 Accessibility to services will therefore be one consideration in assessing applications for housing under this policy. Housing will also be acceptable where it will enhance or maintain the vitality of rural communities. This will need to be demonstrated by the applicant, and could include, for example, a young family moving to the village, someone wishing to work from home, people moving into a village to support other family already living there etc.

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

0156	Comment	Policy	20	5.18	
062				Church Commissioners for England	A013

Detail

We support this policy, in principle, as it provides the flexibility required to address the housing need and demand throughout the district, in particular, growth in the more rural settlements, providing a wider choice of housing for a greater number of communities.

However, paragraph 5.18 of the document places restrictions on development in certain settlements. It is therefore considered that the criterion set out in paragraph 5.18 should only be used as an example to identify sustainable locations; it should not be prescriptive. Some settlements, even without all the services and facilities identified in paragraph 5.18 are still suitable and sustainable to accommodate future growth. It is therefore proposed that paragraph 5.18 is reworded to be more in line with paragraph 5.19 and to ensure that there is no misunderstanding when interpreting the policy when trying to accommodate future growth in the more rural settlements of the district.

Response

Para 5.18 and 5.19 are not separate requirements. The policy and text are meant to be read as a whole. It is clear that the two paragraphs recognise the range of scenarios in the rural area. However, it is considered that 'is close to' in the last sentence of 5.19 is amended to 'and has good access to', as there may be a sustainable location for development which is located on a frequent bus service to, for example, Carlisle or Brampton, or another village with some local services.

Proposed Change

Amend paragraph 5.19:

"It is recognised that within many parts of the rural area it will be difficult to achieve all of the above. The NPPF states that in rural areas LPAs should be responsive to local circumstances and plan housing development to reflect local needs. It goes on to say that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

The local circumstances for Carlisle District are very specific in that there is a large rural area with many villages scattered throughout. The villages vary in size and the level of services that they support. There are some very small villages which support a primary school, for example Raughton head and Wreay, and some much larger villages with few or no services, such as Brisco and Low Row. There are also a number of primary schools, churches, village halls and pubs which lie entirely outside any recognised village, for example Stoneraise Primary School, and Blackford Primary School.

Accessibility to services will therefore be one consideration in assessing applications for housing under this policy. Housing will also be acceptable where it will enhance or maintain the vitality of rural communities. This will need to be demonstrated by the applicant, and could include, for example, a young family moving to the village, someone wishing to work from home, people moving into a village to support other family already living there etc.

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

0972	Comment	Policy	20	5.18 & 5.19
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>New housing should be directed towards these villages which currently have community facilities - where residents can walk to local pubs, shops, village hall, church etc. New houses with their new residents will help support and sustain the existing community facilities and businesses and hopefully allow some new ones to develop.</p> <p>5.18 Concerns as there is a lack of acceptable primary education in particular Wetheral village where 98 units could be built, there is no evidence of working with the County Council on educational provision.</p> <p>5.19 Wetheral parish council cannot agree as it sounding a 'death knell' to rural villages, therefore all rural communities should be included and given the opportunity to have affordable housing, housing for the elderly and affordable rental in perpetuity.</p> <p>There should be a requirement for developers to make financial donations only, to the communities they build in, not elsewhere.</p> <p>We would like to see evidence of the District and County council working together to ensure adequate educational provision in the rural villages, in particular Wetheral Village.</p>			
Response	<p>The first paragraph of this comment contradicts the third.</p> <p>The policy takes a wider approach to housing in villages, and allows housing in villages which may in themselves not have services, but where there may be services in a village nearby. This is in line with paragraphs 54 and 55 of the NPPF. Wetheral is close to Scotby, Cumwhinton, Warwick Bridge and within walking distance of Great Corby where there is a primary school.</p> <p>The City Council is in regular dialogue with the County Council regarding education issues. The Infrastructure Delivery Plan, which is required to demonstrate that the policies in the Local Plan will be delivered in a sustainable way, details the issues surrounding education provision in the District. This section of the plan was drawn up with close collaboration between the two councils.</p> <p>This policy significantly expands on the scope of locations where new housing can be delivered (from that in the adopted 2008 Local Plan). Affordable housing is allowed in an even wider range of locations. The rural exceptions sites policy makes provision for this.</p> <p>Requiring developers to make financial donations to the communities they build in raises ethical issues. Any planning obligation has to be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p>			
Proposed Change	No change to policy as a result of this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0698	Objection	Policy 20	5.19 - 5.21	
150/22	Mr Ian Yates			
Detail	<p>Paras.5.19 and 5.21. - There is no evidence to support the idea that villages work in clusters. It makes no sense to build new houses in locations where there are no public amenities or community facilities of any kind. New housing should be directed towards those villages which currently have community facilities - where residents can walk to the shop, pub, church etc. New houses with their new residents will help to support and sustain the existing community facilities and businesses. It is surely more likely that residents living in villages with amenities will be more likely to use and sustain these facilities than those living in another village several miles away. Developing new housing in villages with no amenities is socially irresponsible. All it does is add additional vehicles to the roads, add to pollution and add to any existing local traffic problems.</p> <p>Housing development in villages and hamlets with no public or community amenities or facilities should be discouraged. It should be limited to infill sites within the settlement boundaries and should be policy-based. The idea of linking villages to each other to try to demonstrate the sustainability of a project should be dropped.</p>			
Response	<p>From talking to rural communities and through the rural masterplanning work there is clear evidence that some villages do work in clusters or have reliance on each other. For example, Newtown, which only has a village hall, is one mile away from Irthington, which has a primary school. The majority of children in Newtown use the Irthington Primary School. The policy does not advocate building in villages where the nearest services are several miles away - criterion 4 states 'in a village nearby'. The policy is consistent with the NPPF in that it recognises that development in one village may support services in a village nearby.</p>			
Proposed Change	<p>Clarify criterion 4 - ...'in the rural area there are either services in the village where the housing is being proposed, or in a village or other settlement nearby there is good access to another village with services, or to the larger settlements of Carlisle, Brampton and Longtown'.</p>			
0363	Comment	Policy 21		
088	Elizabeth Allnutt	Save Our Streets		
Detail	<p>If housing is proposed for Rickergate, SOS would support the principles in these policies, provided the additional provisos of the Conservation Area apply</p>			
Response	<p>Noted.</p>			
Proposed Change				

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

0943 Objection Policy 21

005 Paul Barton Clerk to Dalston Parish Council

Detail
 Density should be reduced to improve quality of life with space for gardens, home food production etc. Densities tend to be developer driven. These densities should not be prescriptive but of a wider range to allow flexibility to improve health and lifestyles.
 The alternative option 5.30 makes it clear that local authorities can set their own policies.

Response
 The phrase 'optimise the potential of the site' could be open to interpretation, and it could lead to a developer seeking higher densities than are appropriate. The Planning Inspectorate have advised that the density figures should be taken out of the policy. In addition, the first sentence is to be amended to better reflect the need to optimise the potential of the site to respond to a number of requirements.

Proposed Change
 Policy 21 - delete first sentence.
 New first sentence as follows:
 "The density of new housing proposals should optimise the potential of the site to respond to local character and establish a strong sense of place, using design to create attractive and safe places to live".
 Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).

0328 Comment Policy 21

081 HS Cartmell A013

Detail
 Housing density is no longer set out in national planning guidance following the publication of the NPPF. Notwithstanding this, the majority of schemes will more than likely still base their average density on 30 dwelling per hectare (as set out in the now superseded 'PPS3 Housing').
 Although it is acknowledged that city centre development should have a higher density to the urban edge and more rural 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.
 It is important to ensure that development land is used efficiently whilst preserving the appearance of the built environment.

Response
 The density figures are to be removed from the policy on the advice of the Planning Inspectorate. In addition, the first sentence is to be amended to better reflect the need to optimise the potential of the site to respond to a number of requirements.

Proposed Change
 Policy 21 - delete first sentence.
 New first sentence as follows:
 "The density of new housing proposals should optimise the potential of the site to respond to local character and establish a strong sense of place, using design to create attractive and safe places to live".
 Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0738	Comment	Policy	21	
154/26/27	Mr Bryan Craig			
Detail	Will it cause a problem to alter the higher densities to a figure of 10 - 50dph. Using statistics from DCLG densities have increased from 26 to 34 since 2005 and we live in an area of 400Sq Miles and 3% developer so I do not feel that density is a problem.			
Response	The Planning Inspectorate have advised that the density figures should be taken out of the policy.			
Proposed Change	Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).			
1111	Objection	Policy	21	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	The opening paragraph of this policy states that housing proposals should, 'optimise the potential of the site'. However, this could easily be taken to indicate presumption in favour of the highest possible housing density. It is recommended that the opening paragraph be re- drafted e.g.: 'New housing proposals particularly in Carlisle, Brampton, Longtown, and other larger villages, should optimise responsiveness to local character and establish a strong sense of place, using design to create attractive and safe places to live.'			
Response	The phrase 'optimise the potential of the site' was taken directly from NPPF paragraph 58 bullet point 3. However, this is open to interpretation, and there is agreement with the consultee that it could lead to a developer seeking higher densities than are appropriate. The proposed alternative sentence is acceptable, but it is considered that it should apply to the whole of the Plan area.			
Proposed Change	Policy 21 - delete first sentence. New first sentence as follows: "The density of new housing proposals should optimise the potential of the site to respond to local character and establish a strong sense of place, using design to create attractive and safe places to live".			
1007	Objection	Policy	21	
194	Michael Barry	Cumbria County Council		
Detail	This policy espouses a flexible approach to considering the strategic effects of development. Within this policy there appears to be a minor error as 30dph has been described as being both a higher and medium density. Suggested Changes: The policy should be revised in order to clarify the proposed housing densities.			
Response	The Planning Inspectorate have advised that the density figures should be taken out of the policy.			
Proposed Change	Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).			

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

0762 Support Policy **21**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change

0077 Objection Policy **21**

034 Lucy Adamski A008

Detail The use of dph figures within residential density bands is no longer included within relevant national policy (NPPF) and should not, therefore, be explicitly referenced in emerging local policy.

Response The Planning Inspectorate have advised that the density figures should be taken out of the policy.

Proposed Change Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).

0157 Objection Policy **21**

062 Church Commissioners for England A013

Detail 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'). 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. It is important to ensure that development land is used efficiently whilst preserving the appearance of the built environment.

Response The density figures are to be removed from the policy on the advice of the Planning Inspectorate. In addition, the first sentence is to be amended to better reflect the need to optimise the potential of the site to respond to a number of requirements.

Proposed Change Policy 21 - delete first sentence.
New first sentence as follows:
"The density of new housing proposals should optimise the potential of the site to respond to local character and establish a strong sense of place, using design to create attractive and safe places to live".
Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0199	Comment	Policy	21	
070	Mr R Coad			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 more than likely still base their average density on 30 dwelling per hectare (as set out in the now superseded 'PPS3 Housing'). Although it is acknowledged that city centre development should have a higher density to the urban edge and more rural 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. It is important to ensure that development land is used efficiently whilst preserving the appearance of the built environment.</p>			
Response	<p>The density figures are to be removed from the policy on the advice of the Planning Inspectorate. In addition, the first sentence is to be amended to better reflect the need to optimise the potential of the site to respond to a number of requirements.</p>			
Proposed Change	<p>Policy 21 - delete first sentence. New first sentence as follows: "The density of new housing proposals should optimise the potential of the site to respond to local character and establish a strong sense of place, using design to create attractive and safe places to live". Paragraph 3 and paragraph 4 remove the figures in brackets (30-50dph) and (30dph).</p>			
0505	Support	Policy	21	105
104	Emily Hrycan	English Heritage North West		
Detail	<p>We welcome the inclusion of criteria, which expects residential density to be determined by local character and establish an attractive place to live. However, it is important that this character be identified within the Plan, so that it informs this policy. This would closely reflect the requirements of the NPPF.</p>			
Response	<p>Support noted.</p>			
Proposed Change	<p>Policy 21 - delete first sentence. New first sentence as follows: "The density of new housing proposals should optimise the potential of the site to respond to local character and establish a strong sense of place, using design to create attractive and safe places to live".</p>			
0184	Comment	Policy	22	
066	Revd. Canon Jan Kearton	The Governing Chapter of Carlisle C		
Detail	<p>We note that the balance of City Council and Registered Social Landlord provision has not been detailed within the provision for social and affordable rent housing, but we understand that the City Council will maintain its current portfolio of social housing and will work in partnership with RSLs for the majority of its offer.</p>			
Response	<p>The City Council no longer has a portfolio of social housing. This was transferred to Riverside (Carlisle) in 2002. However there are currently 14 RSLs who either operate in the District, or provide accommodation but have no local office.</p>			
Proposed Change	<p>No change to policy as a result of this comment.</p>			

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

1112 Objection Policy 22

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail
 The Rural Services Network calculates that, overall, rural residents earn less, on average, than those in cities and pay £75 more per person in council tax yet receive substantially less support for public services whilst urban areas receive government grants 50% higher per head than those in the countryside. Policy 22 should recognise this imbalance and require a greater percentage of affordable housing, or financial commutation, in the rural area. This consideration is especially important in the more remote rural area.
 A large upland area to the north of the district is omitted from Zone A. Although it is a sparsely populated area this does not entirely preclude possible opportunities for development it should, therefore, be included in Zone A as a precaution.

Response
 The Carlisle Housing Need and Demand Study Nov 2011 (HNDS) (the Strategic Housing Market Assessment for Carlisle District (SHMAA)), states at paragraph 7.13 that there are considerable differences between households in different parts of the District with average incomes varying from £16 809 in Carlisle Urban to £26 037 in Rural West, and £23 347 in Rural East. Furthermore paragraph 7.27 states that households in Carlisle Urban are considerably less likely to be able to afford market housing than households in any other area. Households in Rural West appear most likely to be able to afford.
 The section 7 of the HNDS, 'Incomes and Affordability' concludes that 23% of all households can not afford market housing within Carlisle District without subsidy. Levels vary considerably by area with 28% of households in Carlisle Urban being unable to afford compared with 12-14% in the two rural housing market areas.
 As such Policy 22 would be wrong to require a greater percentage of affordable housing in the rural area.
 The north eastern part of the district, which is shown on map 6 as not lying within Affordable Housing Zone A or B, does not contain any settlements. Therefore it would not trigger the affordable housing thresholds set out in Policy 22, as proposals for five units of housing would not be acceptable in the open countryside. Policy 23 - Rural Exception Sites, Policy 24 - Housing for Rural Workers, Policy 25 - Other Housing in the Open Countryside and Policy 26 - Housing Through the Conversion of Heritage Assets all make provision for housing in the open countryside.

Proposed Change
 No change to policy as a result of this objection.

0973 Comment Policy 22

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail
 Under affordable housing there is a recommendation that the parish councils could support schemes and 'sell them' to local communities - parish councils are there to represent communities, most of whom do not want large developments, instead they would prefer small scale developments that are sympathetic to local vernacular styles (p 107) with all of the affordable housing being rental in perpetuity. This is the favourable approach.

Response
 Agree. The aim of the policy is to achieve the target number of affordable units. Matters regarding scale, design etc are dealt with under Policies 20 (unallocated sites) and Policy S3 - Design (all developments). In addition, design policy as set out in the NPPF, including the need to respond to local character, will be used.

Proposed Change
 No change to policy as a result of this objection.

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

0200 Objection Policy 22

070 Mr R Coad 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 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.

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 and we support that there is this opportunity included within the Policy.

The Council needs to prevent policy stifling the delivery of housing in the more rural areas and on smaller sites. Viability is often more 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 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), and this should be amended.

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) and is thought to currently cause confusion in respect of affordable requirement on very small schemes and is an overly onerous requirement.

Response

A viability appraisal of the Local Plan policies which are likely to have a cost implication for development (in combination) is currently being undertaken to satisfy paragraphs 173 and 174 of the NPPF.

We welcome the support for the final sentence in the policy which allows flexibility on numbers of affordable units where site viability is likely to be an issue. Affordable housing within the District is currently being achieved under current Local Plan policy, which has a higher threshold in the urban area, and a differentiated threshold in the rural area depending on site size, going down to 0.1ha or three units at the lower end.

A recent application at Dalston for 121 units achieved 20% affordable units on the basis that a greater proportion of discounted social rent units were provided. The Housing Needs & Demand Study identified that there is a strong need for affordable rented housing in Carlisle District. Registered Social Landlords (RSLs), who provide the affordable rented units, can generally only afford to purchase units from developers at 40-45% of the full market value. This is significantly lower than 25-30% level of discount from the market value that developers provide when selling affordable units. In order to enable RSLs to acquire much needed affordable rented housing, the developer must provide a higher level of subsidy on each unit than is required by Policy H5. In return, the City Council accepts fewer affordable units on schemes. Without this approach, very limited affordable rented housing would be delivered.

The (Preferred Options) Policy 22 is therefore generally more flexible than the previous Local Plan policy, (the lower threshold being five units rather than three in the rural area, and 25% of units rather than 30% in the urban area and parts of the west of the district).

The Affordable Housing Economic Viability Assessment (AHEVA) states at paragraph 6.12; "To maximise affordable housing delivery the Council should seek to continue the implementation of 30% affordable housing, however, seek a higher percentage of social rented units in the higher value areas".

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
Proposed Change	ACTION - potential change to policy.			

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

0158 Objection Policy 22

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 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.

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 and we support that there is this opportunity included within the Policy. Viability is often more 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.

This policy should be underpinned by reference to viability testing on a site-by site 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).

Response

A viability appraisal of the Local Plan policies which are likely to have a cost implication for development (in combination) is currently being undertaken to satisfy paragraphs 173 and 174 of the NPPF.

We welcome the support for the final sentence in the policy which allows flexibility on numbers of affordable units where site viability is likely to be an issue. Affordable housing within the District is currently being achieved under current Local Plan policy, which has a higher threshold in the urban area, and a differentiated threshold in the rural area depending on site size, going down to 0.1ha or three units at the lower end.

A recent application at Dalston for 121 units achieved 20% affordable units on the basis that a greater proportion of discounted social rent units were provided. The Housing Needs & Demand Study identified that there is a strong need for affordable rented housing in Carlisle District. Registered Social Landlords (RSLs), who provide the affordable rented units, can generally only afford to purchase units from developers at 40-45% of the full market value. This is significantly lower than 25-30% level of discount from the market value that developers provide when selling affordable units. In order to enable RSLs to acquire much needed affordable rented housing, the developer must provide a higher level of subsidy on each unit than is required by Policy H5. In return, the City Council accepts fewer affordable units on schemes. Without this approach, very limited affordable rented housing would be delivered.

The (Preferred Options) Policy 22 is therefore generally more flexible than the previous Local Plan policy, (the lower threshold being five units rather than three in the rural area, and 25% of units rather than 30% in the urban area and parts of the west of the district).

The Affordable Housing Economic Viability Assessment (AHEVA) states at paragraph 6.12; "To maximise affordable housing delivery the Council should seek to continue the implementation of 30% affordable housing, however, seek a higher percentage of social rented units in the higher value areas".

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

Proposed Change ACTION - potential change to policy.

0944 Comment Policy **22**

005 Paul Barton Clerk to Dalston Parish Council

Detail The principle of affordability should be retained throughout the lifetime of the property. All developments should contain an element of shared ownership. The affordable allocation should be used in the parish in which it is generated. Affordable allocation should not be negotiable.

Response Only certain types of affordable housing can remain affordable in perpetuity. The government Right to Acquire rules apply to all houses in urban areas with a population of over 3000. Therefore, within Brampton and Carlisle, if you are living in a property that was built or bought by a RSL, or transferred from a local council to a RSL after 1/04/97, you are able to staircase out to full ownership if you are in a shared ownership property, or buy your property if you are renting it. Therefore the only properties that remain affordable in perpetuity are those in certain parishes as defined by the Government under the Right to Acquire legislation (in Carlisle this is the whole of the rural area apart from Brampton), and discounted sale properties.
Demand for shared ownership varies according to market conditions. There is some evidence that there is currently increasing demand for shared ownership. Making more properties available in this way can free up valuable social rented options, which are in short supply. In determining the type of affordable housing to be provided on a site, the Council's Housing Service will advise developers on the appropriate type and mix of units to ensure local need is being met. In allocating affordable housing to occupiers in the rural area, the Choice Based Lettings scheme is operated. This means that the housing is first to be offered to people within the parish where the housing is developed, then the wider Housing Market Area, (either rural east or rural west) and then the City.
Affordable housing thresholds in the policy need to be negotiable. This is in line with the Harman guidance (Viability Testing Local Plans) which states on page 41: "...frequent viability updates will be avoided if the plan includes a 'viability cushion', so that modest changes in the value of development variables, or changes in the types of sites being developed, do not render the plan unviable and undeliverable".

Proposed Change No change to policy as a result of this objection.

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

0117 Objection Policy 22

051 Story Homes Ltd A010

Detail The affordable housing requirements are noted. As previously referenced (Rep Ref 0111), the inability to review the whole viability of the Local Plan, not just affordable housing makes commenting on the Policy difficult. It is noted that the affordable housing viability paper suggests a lower level than that proposed by the Preferred Options policy. Whilst open book opportunities are understood, these should not be the default position for determining planning applications.

Response A viability assessment of those policies in the Local Plan which will have a cost implication for developers is being undertaken. The Preferred Options policy sets a threshold of five units or over in Zone A, (which equates to zones 3 and 4 in the AHEVA). Paragraph 6.12 of the AHEVA recommends 30% on ALL sites. Therefore the policy suggests a lower threshold than the evidence, and not the other way around as suggested by the objector. Furthermore the AHEVA does not suggest a site size threshold for Zones 1 and 2 (zone B in the policy), whilst the policy requirement only applies on sites of 10 units and over. The last sentence of the policy makes provision for circumstances where site viability issues prevent the required level of affordable housing to be delivered. This is in line with the Harman guidance (Viability Testing Local Plans) which states on page 41: "...frequent viability updates will be avoided if the plan includes a 'viability cushion', so that modest changes in the value of development variables, or changes in the types of sites being developed, do not render the plan unviable and undeliverable".

Proposed Change No change to policy as a result of this objection.

1008 Comment Policy 22

194 Michael Barry Cumbria County Council

Detail It will be important that the Local Plan can deliver homes to meet differing needs across the District. The City Council's Housing Need and Demand Study has identified a net annual affordable housing shortfall of 708 units across Carlisle. A standard method to deliver affordable housing is for the developer to build these as a proportion of open market housing as part of the mix of housing on a development site. This approach to delivering affordable homes is increasingly important given the reducing level of central Government financial support for new affordable housing.

To facilitate the delivery of affordable housing, the Local Plan proposes that in most rural parts of the district, 30% of homes on sites containing 5 or more homes would be affordable, while 25% of homes on sites containing 10 or more homes would be affordable in most urban areas and in the easternmost parts of the District. It is considered that combined with the proposed uplift in housing numbers, this policy approach should aid the delivery of necessary affordable homes across Carlisle.

It is understood that the affordable housing targets identified were subject to viability assessment. Considering when this was undertaken, the assessment may not have fully accounted for the other probable infrastructure costs to support the Local Plan. It is therefore important that necessary viability assessments are undertaken again once Local Plan proposals and their infrastructure needs become better understood.

Suggested Changes:

During the plan's development, the viability of the affordable housing requirement should be kept under review as the understanding of infrastructure requirements develop.

Response Noted. Further viability work is being undertaken on the cost implications of all the policies in the Local Plan.

Proposed Change No change to policy as a result of this comment.

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

0763 Support Policy 22

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail

Response Support noted.

Proposed Change

0329 Comment Policy 22

o81 HS Cartmell 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 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.

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 of housing land release and therefore an unsound plan which is unable to meet its housing targets over the plan period. This should be acknowledged within the policy and / or supporting text.

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 and we support that there is this opportunity included within the Policy.

Response A whole plan viability assessment is being undertaken which will assess the impact of all policies with a cost implication on the delivery of the objectives of the Plan.

Proposed Change No change to policy as a result of this objection.

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

0400 Objection Policy 22

094 Cllr Betton

Detail I would like to encourage in the plan the building of one bed roomed flats/housing given light the economic situation presently where one bed accommodation is in demand due to introduction of bedroom tax, one bed social is being demolished and diminishing. With Botcherby being deprived and the cuts to benefits a lot of residents affected will be unable to afford private sector the other alternative and I foresee this as a problem which could be solved if incorporated into the Local Plan.

Response There is a need for different types of housing in different areas of the District at any one time. In addition, those needs change over time. The Plan period extends up to 2030. Housing need changes over time, and what is appropriate now is unlikely to be appropriate in five or ten years time. However, it is considered that the justification to the policy would benefit from an explanation of how the appropriate mix and type of housing for a given site will be achieved.

Proposed Change New paragraph after 5.4.2:
 "In determining the type of affordable housing to be provided, the Council's Housing Service will advise developers of the appropriate type and mix of units for each site to ensure local need is being met. This will help deliver the priorities in the Carlisle Housing Strategy 2012-2016, especially the need to 'work closely with local communities to address their housing needs and preferences, and support community based development initiatives!'"

0484 Support Policy 22

103 Kingmoor Park Properties A017

Detail Policy sets the requirements for affordable housing, provision, which vary depending on the location of the development. The policy allows for flexibility in the provision subject to the submission of a financial appraisal. This is supported.

Response Support noted.

Proposed Change

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

0398 Objection Policy 22

093 Sam Greig Taylor & Hardy

Detail
 The explanatory text supporting the policy states that "the scale of affordable housing required by this policy has been calculated following the undertaking of an Affordable Housing Economic Viability Assessment" (AHEVA), which was produced by Roger Tym and Partners in November 2012. It is submitted that the affordable housing policy does not reflect the advice contained in the AHEVA. Paragraph 6.6 of the AHEVA states that "the lower value areas (Zones 1 and 2) cannot currently support affordable housing at any level on the grounds of viability therefore any proposed policy needs to be flexible to reflect the various market characteristic of Carlisle District". Policy 22 identifies Zones 1 and 2 of the AHEVA as Zone B. The emerging policy requires that the schemes of 10 or more units, within Zone B, ought to provide an affordable housing contribution of 25%. This apparent conflict calls into question whether the evidence base has been relied upon. The policy also requires that where developers seek to depart from the policy, a financial appraisal should be provided to justify a lower level of affordable housing provision. As the evidence base identifies that there are issues surrounding the viability of schemes, particularly in respect of development in Zone B, such an approach would be unreasonable. The current affordable housing policy in the adopted Local Plan has been criticised for its lack of clarity in respect of the calculation of commuted payments. The proposed affordable housing policy provides fails to provide any further clarity and is silent on the matter.

Response
 ACTION - clarification needed as quoted paragraph does not appear in AHEVA. Phone call 11/11/13. The AHEVA published on our web pages is a draft version from Nov 2012. The final report is dated Jan 2013, and para 6.6 no longer appears as quoted in this objection. However, the AHEVA continues to make specific reference to lower value areas. Objector given opportunity to re-evaluate objection.

Proposed Change
 No change at present as a result of this objection. FURTHER ACTION MAY BE REQUIRED.

0814 Objection Policy 22

160/35 Mrs Catherine Leach Clerk to Bewcastle Parish Council

Detail
 The Council were worried that 'off-site provision' would lead to a poor social mix possibly resulting in sites of exclusively 4 bedroom houses. It was felt that affordable houses should always be included and that money in lieu should never be allowed. It was also of concern that affordable housing was not being provided in villages where it was needed to stop the exodus of young people from the rural areas. Affordable houses should always be included and that money in lieu should never be allowed. Affordable housing should be provided in villages.

Response
 The justification to the policy, at paragraph 5.43, states that off-site provision will only be agreed in exceptional circumstances. Commuted sums will generally only be required where the % requirement does not equate to a full house. The policy will apply in villages, on sites of 5 units and over, or sites of 10 units and over, depending on which zone the site is located within.

Proposed Change
 No change as a result of this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0610	Objection	Policy	22	
128	Cllr John Mallinson	Carlisle City Conservative Group		
Detail	<p>The Plan does not do enough to encourage housing development in the rural areas of the District. The Plan requires to take into account housing developments in the rural areas of the District, which are often not on a scale large enough to deliver any Affordable Housing option within the site. Consequently, rural areas do not benefit from such schemes. Housing Developments with a mixture of both market value and affordable homes create a more balanced social mix. The Plan should also take a more relaxed approach in regarding the sustainability Appraisal/Test for new housing in the rural areas.</p>			
Response	<p>Policy 19 - Housing Strategy and Delivery makes provision for 30% of the housing target to be met in the rural areas. As such the Plan allocates sites for housing development in Brampton, Longtown and a number of villages in the rural area. Policy 20 - Housing Development, makes provision for housing elsewhere, i.e. on sites that have not been allocated, and provides a flexible approach to such applications. The scope of locations in the rural area where housing is allowed has been widened from the last Local Plan, and now no longer relies on the old classification of Local Service Centres. Instead, the policy advocates housing development where it will promote the vitality of the settlement, and enhance or maintain the vitality of rural communities.</p> <p>The Plan cannot advocate a lower threshold for affordable housing in rural areas, as this would risk making sites unviable, which would be contrary to paragraph 173 and 174 in the NPPF.</p>			
Proposed Change	<p>No change as a result of this objection.</p>			

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

0062 Objection Policy 22

033 Matthew Good Home Builders Federation

Detail

The policy is unsound as it is not positively prepared or justified. The Councils own evidence suggests that the levels of affordable housing required are likely to be unviable.

The policy identifies that affordable housing will be required at a rate of 30% on sites of 5 or more dwellings in Zone A, which includes the majority of the rural area, Dalston, Brampton and parts of North Carlisle, and 25% on sites of 10 or more in Zone B, which covers the remainder of the district.

The levels of affordable housing are considered too high and will have a detrimental effect on development viability. The AHEVA does indicate that up to 30% affordable housing is viable in areas 3 and 4, which equate with Zone A in the plan. These results do, however, need to be viewed cautiously as the AHEVA takes no account of section 106 contributions (paragraph 4.30) which could have a significant effect upon development viability. NPPF paragraph 173 is very clear that the economic impacts of policies and obligations need to be considered in the production of the local plan. The cumulative impacts of policies and obligations should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. It is argued that placing the affordable housing contribution near the margins of viability without consideration of other contributions and costs in Zone A is contrary to national policy and will render much development unviable.

Zone B is even more problematic. This area, which equates to areas 1 and 2 in the AHEVA, is recommended for nil affordable housing contributions (AHEVA paragraph 7.11). The Council's ambitions for 25% affordable housing is not consistent with its own policy, which as noted above does not include an allowance for section 106 contributions. The effect of this policy will render development unviable within this area. This is particularly problematic given that Policy S2 aims to provide 70% of the development within the urban area of Carlisle, much of which would fall within this zone. The effect of this policy will be to make the plan undeliverable.

It is noted that the policy identifies that a developer can negotiate on these requirements providing a financial appraisal is submitted. Such 'open-book' assessments should not be used as a default remedy to unsustainable policies. It is incumbent upon the Council to ensure its policies are sustainable in the majority of cases, with open-book assessments reserved for special cases.

Recommendation: It is recommended that the Council reconsiders this policy in light of its own evidence. The amended policy should provide reduced affordable housing requirements in Zone A and nil affordable housing requirements in Zone B. The amended policy should take account of the cumulative impact of all policies and obligations to ensure development remains viable and provides sufficient incentives for a willing landowner and developer. If the Council wishes to increase its supply of affordable housing over and above these reduced requirements it should consider other mechanisms to do this. This could include increasing the amount of market housing, particularly in the more viable areas.

Response

The objector states that the policy requirements place the affordable housing contribution near the margins of viability. The AHEVA states that a 30% contribution can be achieved in Areas 3 and 4, which equates with Zone A in the policy. The AHEVA does not stipulate a threshold for numbers. The policy has a threshold of 5 units or more. It is considered that this threshold eases the policy requirement above the recommendation of the AHEVA, and in recognition that a whole plan viability assessment has not yet been completed. The Council is currently undertaking such a study, and the outcomes of this study will further inform this policy.

With regards to the objectors comments to requirements for Zone B, paragraph 7.11 of the AHEVA is quoted. This paragraph appeared in a draft version of the AHEVA and not the final January 2013 report. This now states, at paragraph 6.12: 'To maximise affordable housing delivery the Council should seek to continue the implementation of 30% affordable housing, however, seek a higher % of social rented units in the higher value areas'.

With regards to the objectors comments on open book assessments, the last sentence of the policy makes provision for circumstances where site viability issues prevent the required level of affordable housing to be delivered. This is in line with the Harman guidance (Viability Testing Local Plans) which states on page 41: "...frequent viability updates will be avoided if the plan includes a 'viability cushion', so that modest changes in the value of development variables, or changes in the types of sites being developed, do not render the plan unviable and undeliverable".

Proposed Change ACTION - policy may change as a result of viability assessment.

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

0699 Comment Policy 22

150/22 Mr Ian Yates

Detail No detailed survey of affordable housing needs appears to have been undertaken at local i.e. village level. I think this needs to be done.

Response A key element of the Nov 2011 HNDS was an assessment of both current and future affordable housing need. The most recent practice guidance on how to do this is contained in the CLG SHMA Guidance of August 2007. This states that it can be difficult to obtain a complete and robust estimate of current housing need including any backlog due to data limitations. Traditionally local surveys have been used although they can be costly to administer and difficult to interpret. Annex C of the guidance provides advice on undertaking household surveys. The 2011 HNDS followed this guidance. 10 000 survey forms were sent out and a total of 2581 were completed and returned. Paragraph 18 of the practice guidance states:
 'A common misconception when sampling is that it should be based on a certain percentage of the population being studied. In fact, it is the total number of cases sampled which is important. As the number of cases increase, the results become more reliable but at a decreasing rate... Approximately 1,500 responses should allow a reasonable level of analysis for a local authority area'.
 The Council does not have the resources to carry out village level surveys across the district. However, such surveys could be encouraged through the neighbourhood planning process, or through community plans. Dalston Parish Council has recently undertaken a parish housing needs (Sept 2013) survey using Cumbria Rural Housing Trust.
 The HNDS identifies the district wide need for affordable housing. Local surveys can identify more detailed local need at a given point in time within a parish. They will be encouraged through neighbourhood or community led plans.

Proposed Change Justification to policy to include paragraph to reference parish level surveys, as follows:
 After paragraph 5.38 insert new paragraph:
 "At parish level, in September 2013 Dalston Parish Council commissioned Cumbria Rural Housing Trust to carry out a parish level survey to evidence the need for affordable housing within the community up to 2018. The survey provides an evidence base for Dalston Neighbourhood Development Plan (NDPS). The City Council will continue to support and encourage parish level surveys to evidence NDPs and other community led plans.

0739 Comment Policy 22

154/26/27 Mr Bryan Craig

Detail Could we mention Shared Ownership in this Policy

Response Paragraph 5.42 of the justification to the policy states: 'Demand for intermediate housing (such as shared ownership) can vary with market conditions and as a result there may be occasions where an increased proportion of social rented housing will be acceptable. Flexibility is therefore important to address housing need whilst ensuring mixed communities are created'.
 It is considered that this paragraph could be expanded to further explain shared ownership.

Proposed Change Add before penultimate sentence:
 'Shared ownership involves the purchase of an initial share of a property, and paying rent to a not-for-profit organisation for the remaining amount. The initial share purchased is normally between 25% and 75% of the full market value, and this share can generally be increased if requested. In most cases (except in protected rural areas), it is possible to increase the share to 100% of the property'.

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

0078 Comment Policy 22

034 Lucy Adamski Aoo8

Detail
 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.
 However, it is suggested that a common appraisal tool be considered so as to avoid inconsistent assessments and the council being faced with any uncertainty or ambiguity on a site-by-site basis. The Three-Dragons model, which is used across Greater London, is one such option. <http://www.three-dragons.co.uk/index.asp>
 Also, at paragraph 5.43, it would be wise to consider whether commuted sums should be entertained only as exceptional circumstances given the management issues and costs arising to RSLs from small numbers of affordable units. They may well have a wider benefit if pooled from a number of smaller sites of this nature.

Response
 The last sentence of the policy makes provision for circumstances where site viability issues prevent the required level of affordable housing to be delivered. This is in line with the Harman guidance (Viability Testing Local Plans) which states on page 41:
 "...frequent viability updates will be avoided if the plan includes a 'viability cushion', so that modest changes in the value of development variables, or changes in the types of sites being developed, do not render the plan unviable and undeliverable".
 It is recognised that a number of different models are available to carry out viability tests for specific sites. The Harman Guidance states on page 25 that: "The LPA should be in a position to make a well-informed judgement as to the merits of any given approach to the viability assessment".
 Rather than define within the policy the type of appraisal tool to be used, the justification could usefully indicate that where a policy departure is requested, the Homes and Communities Development Appraisal Tool or similar is used.
 With regard to the payment of commuted sums in exceptional circumstances, the comment that small numbers of units can give rise to management issues and costs for RSLs is noted. To be more compliant with the policies in the NPPF, it is suggested that paragraph 5.43 be amended to reflect bullet point 4 of paragraph 50 of the NPPF which uses the term 'robustly justified' rather than 'exceptional circumstances'.

Proposed Change
 After paragraph 5.35 insert new paragraph:
 "The policy contains a viability cushion in line with advice in the Harman guidance, 'Viability Testing Local Plans'. Therefore when the requirements of this policy make a site unviable, the Council will expect the developer to submit an appraisal such as the Homes and Communities Development Appraisal Tool or similar, before a departure from the policy will be allowed.
 Paragraph 5.43, first sentence, delete 'in exceptional circumstances'.. Insert '...where such an approach can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities'".

0945 Comment Policy 23

005 Paul Barton Clerk to Dalston Parish Council

Detail
 This policy is OK.

Response
 Noted.

Proposed Change

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1113	Objection	Policy	23	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Criteria 1-5 in forming the first part of the policy, especially criterion 2, are welcomed as being both protective, but not overly restrictive, of small rural exception sites. However it would be helpful to communities to incorporate, as Criterion 1, specific reference to The Community Right to Build; e.g. 'the development is a proposal subject to Community Right to Build legislation'</p> <p>The criteria governing exceptional circumstances 1-3, forming the second part of the policy, require further qualification to include a need for any supporting evidence to include community consultation; and where such evidence is at variance with the opinion of the community then the latter should be accorded greater weight.</p>			
Response	<p>Planning decisions must be objectively based, taking account of the best evidence. Community views are important, and will be given equal weight to other material considerations, provided they are evidence based, and not an emotional response to a planning application. The NPPF states that LPAs should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.</p> <p>The Community Right to Build allows local communities to undertake small-scale, site-specific, community-led developments. The new powers give communities the freedom to build new homes, shops, businesses or facilities where they want them, without going through the normal planning application process. To get the go-ahead, the proposals must:</p> <ul style="list-style-type: none"> •have the agreement of more than 50% of local people that vote through a community referendum •meet some minimum requirements (for example, they should generally be in line with national planning policies and strategic elements of the local plan) <p>Members of the community will need to set themselves up as a corporate body with the purpose of furthering the social, economic and environmental well-being of the local community. The developments would then be managed by this corporate body. Any benefits from any development which come to the body must be retained or used for the benefit of the community. While it will be for communities themselves to identify suitable land, sources of finance and secure local agreement for their proposals, the government is funding a package of support to help communities that want to use the right.</p> <p>Proposals for rural exceptions sites do not need to be limited to community right to build schemes.</p>			
Proposed Change	No change to policy in response to this objection.			

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

0454 Objection Policy 23

102 Dr Kate Willshaw Friends of the Lake District

Detail
 Friends of the Lake District does not object in principle to rural exception housing on the basis that it is important to meet identified local housing needs. However, we object to this policy as written as it may not adequately protect the rural landscape. Similar caveats as applied to housing development in Policy 20 should be applied to rural exception housing namely that:
 "The landscape impact of developments will be assessed against the Cumbria Landscape Character Guidance and Toolkit."
 Rural exception housing should be held to the same high design standards that other, non-exception site housing is held to. It is also doubly important that this sort of development fits well within its landscape setting and if possible relates to other dwellings and structures within the landscape.

Suggest: See above; exception housing proposals should be assessed against the Cumbria Landscape Character Guidance and Toolkit and should be designed to fit well within their landscape setting.

Response
 Noted. Whilst Policy 62 - Landscapes states that proposals for development will be assessed against the Cumbria Landscape Character Guidance and Toolkit, and the Plan attempts not to duplicate statements within policies, it is considered that the policy would benefit from such a reference.

Proposed Change
 New sentence at end of paragraph 5.52
 'The landscape impact of proposals will be assessed against the Cumbria Landscape Character Guidance and Toolkit'.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0330	Objection	Policy	23	
081		HS Cartmell	A013	
Detail	<p>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.</p> <p>As set out in paragraph 5.60 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 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".</p> <p>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.</p> <p>Furthermore, we do have concern 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.</p>			
Response	<p>The policy is NPPF compliant. The NPPF states that in rural areas housing should be planned to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Therefore the policy is correct in making provision for 100% affordable when appropriate. The second part of the policy introduces the flexibility to have an element of open market housing on a rural exception site in order to enable the delivery of the affordable housing.</p> <p>The policy represents only one way of delivering affordable housing, and there is no implication in the justification that the Council is placing significant reliance on the rural exceptions sites policy to deliver affordable housing.</p> <p>Separate viability work is being undertaken on the whole Local Plan, to ensure that the growth ambitions set out in the Plan are deliverable taking into account the policies which are likely to have additional cost implications on development. It is not considered necessary to reference the Harman report or paragraph 173/174 of the NPPF (Ensuring viability and deliverability) within the context of Policy 23.</p> <p>The removal of settlement boundaries (which were tightly drawn) is intended to make it easier to deliver rural housing by widening the scope of locations in a village where new housing can be developed. Previously, it was largely only sites within villages which could be developed, as any sites on the edge of villages often lay outside the settlement boundary. This was leading (in some cases) to an alteration of village character, leading to more cramped form of development. Proposed new Policy 20 now makes provision for new housing development (sites not allocated), and has 7 criteria which guide when such development will be acceptable. Policy 23 will therefore apply to those sites put forward for housing which would not comply with Policy 20.</p>			
Proposed Change	No change to policy as a result of this objection.			

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

0855 Objection Policy 23

173 Cllr Bloxham

Detail Remove item 4 as this will mean the demise of small villages and will not allow them to grow, or provide accommodation for youngsters of the village.

Response It is considered that criterion 4 is needed in order to deliver sustainable development on rural exception sites. The NPPF defines three strands to sustainable development, the second strand being 'a social role'. This identifies the need to 'support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations...with accessible local services that reflect the community's needs...'.
If affordable housing is allowed on rural exception sites in locations remote from services it will not be sustainable development in accordance with the NPPF.

The Sustainability Appraisal identified that the approach scored highly in terms of social objectives by providing affordable housing in locations where new housing would not normally be allowed, helping to promote social inclusion and keep families and communities together whilst also helping to sustain rural services and the rural economy. However, the appraisal found it is likely to have uncertain or potentially significant negative effects on the environment, as development is likely to be located in areas which are not served by public transport. This impact could be mitigated to a certain extent by criteria based policies to ensure development is directed to the most accessible settlements which may have some level of service provision.

Proposed Change No change to policy as a result of this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0159	Objection	Policy	23	
062		Church Commissioners for England	A013	
Detail	<p>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.</p> <p>As set out in paragraph 5.60 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".</p> <p>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.</p> <p>Furthermore, we do have concern 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.</p>			
Response	<p>The policy is NPPF compliant. The NPPF states that in rural areas housing should be planned to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Therefore the policy is correct in making provision for 100% affordable when appropriate. The second part of the policy introduces the flexibility to have an element of open market housing on a rural exception site in order to enable the delivery of the affordable housing.</p> <p>The policy represents only one way of delivering affordable housing, and there is no implication in the justification that the Council is placing significant reliance on the rural exceptions sites policy to deliver affordable housing.</p> <p>Separate viability work is being undertaken on the whole Local Plan, to ensure that the growth ambitions set out in the Plan are deliverable taking into account the policies which are likely to have additional cost implications on development. It is not considered necessary to reference the Harman report or paragraph 173/174 of the NPPF (Ensuring viability and deliverability) within the context of Policy 23.</p> <p>The removal of settlement boundaries (which were tightly drawn) is intended to make it easier to deliver rural housing by widening the scope of locations in a village where new housing can be developed. Previously, it was largely only sites within villages which could be developed, as any sites on the edge of villages often lay outside the settlement boundary. This was leading (in some cases) to an alteration of village character, leading to more cramped form of development. Proposed new Policy 20 now makes provision for new housing development (sites not allocated), and has 7 criteria which guide when such development will be acceptable. Policy 23 will therefore apply to those sites put forward for housing which would not comply with Policy 20.</p>			
Proposed Change	No change to policy as a result of this objection.			

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

0079 Comment Policy 23

034 Lucy Adamski Aoo8

Detail Support the inclusion of a policy designed to support rural exceptions sites as a matter of principle. However, having looked at policy 20 (Housing Development), there is scope for some overlap and confusion as both provide different policy approaches to rural housing? Finally, there is also the text at paragraphs 1.39-1.41 to consider in respect of rural housing and formal exceptions sites? It is therefore suggested that these policy strands be perhaps more closely aligned.

Response Policy 20 is aimed at making provision for any type of housing development that may be proposed for a site that is not specifically allocated in the Local Plan. This is likely to be largely open market housing with an affordable element. Policy 23 is primarily to make provision for affordable housing schemes on sites that wouldn't comply with the criteria in Policy 20 i.e. rural exception sites, with the flexibility in the policy to allow a proportion of open market housing in certain circumstances. Paragraph 5.50 of the justification gives examples of the type of land that could qualify as an exception site.

Proposed Change No change to policy as a result of this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0201	Objection	Policy	23	
070	Mr R Coad			A013
Detail	<p>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.</p> <p>As set out in paragraph 5.60 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".</p> <p>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 concern 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.</p>			
Response	<p>The policy is NPPF compliant. The NPPF states that in rural areas housing should be planned to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Therefore the policy is correct in making provision for 100% affordable when appropriate. The second part of the policy introduces the flexibility to have an element of open market housing on a rural exception site in order to enable the delivery of the affordable housing.</p> <p>The policy represents only one way of delivering affordable housing, and there is no implication in the justification that the Council is placing significant reliance on the rural exceptions sites policy to deliver affordable housing.</p> <p>Separate viability work is being undertaken on the whole Local Plan, to ensure that the growth ambitions set out in the Plan are deliverable taking into account the policies which are likely to have additional cost implications on development. It is not considered necessary to reference the Harman report or paragraph 173/174 of the NPPF (Ensuring viability and deliverability) within the context of Policy 23.</p> <p>The removal of settlement boundaries (which were tightly drawn) is intended to make it easier to deliver rural housing by widening the scope of locations in a village where new housing can be developed. Previously, it was largely only sites within villages which could be developed, as any sites on the edge of villages often lay outside the settlement boundary. This was leading (in some cases) to an alteration of village character, leading to more cramped form of development. Proposed new Policy 20 now makes provision for new housing development (sites not allocated), and has 7 criteria which guide when such development will be acceptable. Policy 23 will therefore apply to those sites put forward for housing which would not comply with Policy 20.</p>			
Proposed Change	<p>No change to policy as a result of this objection.</p>			

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

1009 Comment Policy 23

194 Michael Barry Cumbria County Council

Detail
 Paragraph 55 of the NPPF highlights how housing should be located where it can enhance or maintain the vitality of rural communities with Paragraph 54 recognising the role of rural exceptions sites in supporting these communities. It also recommends 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'.
 Policy 23 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.

Response
 Noted.
Proposed Change

0506 Objection Policy 23 111

104 Emily Hrycan English Heritage North West

Detail
 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.

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".

Response
 Policy S3 - Design states that all new development proposals will be assessed against 10 design principles. The criteria stipulate (among other things) that proposals should respond to the local context and form of surrounding buildings; take into consideration any important landscape or topographical features and respect local landscape character; and ensure that all components of the proposal are well related to one another to ensure a well integrated, successful and attractive development. Any proposal that comes forward under Policy 23 will also be assessed against other relevant policies in the Plan, including Policy S3 - Design. As such, the new criterion suggested by the consultee is not considered necessary.

Proposed Change
 No change to policy as a result of this objection.

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

0015 Comment Policy **23** 111 - 113

010 Richard Ritson Chair of Kingwater Parish Council

Detail We support affordable housing development on Rural Exception sites BUT we may need some SMALL development where there are no public transport links otherwise we will not be able to keep our young people.

Response Housing in locations remote from services and facilities, or remote from access to services and facilities can lead to isolation for families/occupiers of such housing. Those who occupy affordable housing are potentially less likely to own a car, be in full time employment, or have the same disposable income as those in open market housing. As such it is more important for them to have good access to local services and facilities. Therefore the policy generally favours housing proposals in accordance with criterion 4.

Proposed Change No change to policy as a result of this comment.

0946 Objection Policy **24**

005 Paul Barton Clerk to Dalston Parish Council

Detail This policy is generally restrictive and illustrates a lack of understanding as to how small rural business develop. There should be a proven need for a stable business and proper accountability.

Response The policy is written to ensure that provision is made for rural housing to meet an essential need for a rural worker, in accordance with policy in the NPPF. The criteria provide greater clarity to the policy, and guide the type of evidence that will be required to be submitted with the application. The policy aims to deliver housing that will be sustainable for the long term in meeting the identified need, and avoid such housing becoming redundant in the short term and therefore becoming open market housing in the open countryside. The NPPF states that isolated new homes should only be allowed in the open countryside in special circumstances. The policy sets out the special circumstances and the criteria ensure that housing is delivered to meet only the housing specified.

Proposed Change No change to policy as a result of this objection.

1114 Objection Policy **24**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail As criterion 1 of the policy refers to 'a full time worker', it would serve the interests of clarity and avoid doubt to insert the word 'Individual', or 'Single', at the commencement of the first sentence. It would be helpful to refer to the expected scale of the proposal. The inclusion of paragraph 5.67 within the actual policy would make it clear from the outset that the policy is intended to restrict occupancy in perpetuity.

Response The phrase 'a full time worker' is considered to carry enough clarity, and does not require further qualification by the use of the terms 'individual' or 'single'. The justification carries equal weight to the policy. Therefore there is no need to include paragraph 5.67 within the policy.

Proposed Change No change to policy in response to this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0764	Support	Policy	24	
156/29-31	Mr Viv Dodd	Cumbria Business for Business		
Detail	Support			
Response	Support noted.			
Proposed Change				
0213	Comment	Policy	24	
072	Miss Alice Unsworth	NFU		
Detail	The NFU welcomes any policies that encourage sustainable growth of agricultural businesses, but we require clarification of what criteria will be used to assess point 3: "the housing need cannot be met by housing nearby".			
Response	This policy is intended to make provision for housing in the open countryside in special circumstances as set out in the NPPF. It is possible that a rural worker could be housed in a house in a nearby village or other location, provided that the location was acceptable and the house was available at an affordable price for that specific rural worker. Both the NPPF and Policy 24 state and 'essential need' for the rural worker to live at or near their place of work in the countryside. Criteria 3 is intended to ensure that there isn't an existing house nearby that could be suitable. The text in paragraph 5.65 can be amended to further clarify this point.			
Proposed Change	Paragraph 5.65 insert after first sentence: 'This would require a basic search for houses for sale in the immediate locality and a brief indication as to why they are not suitable to meet the need for the rural worker, (for example on the grounds of location or price)'.			
1010	Comment	Policy	24	
194	Michael Barry	Cumbria County Council		
Detail	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. Such housing should only be acceptable where there exists a demonstrable need for it (i.e. an occupational requirement). This policy provides a mechanism whereby proposals for rural workers accommodation can be adequately considered and is considered to be broadly acceptable.			
Response	Noted.			
Proposed Change				

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

0455 Objection Policy 24

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District does not object in principle to housing for rural workers on the basis that it is important to meet identified housing needs. However, we object to this policy as written as it may not adequately protect the rural landscape.

Similar caveats as applied to housing development in Policy 20 should be applied to rural workers housing namely that:

"The landscape impact of developments will be assessed against the Cumbria Landscape Character Guidance and Toolkit."

Rural workers housing should be held to the same high design standards that other, non-exception site housing is held to. It is also doubly important that this sort of development fits well within its landscape setting and if possible relates to other dwellings and structures within the landscape.

Suggest: See above; exception housing proposals should be assessed against the Cumbria Landscape Character Guidance and Toolkit and should be designed to fit well within their landscape setting

Response Noted. Whilst Policy 62 - Landscapes states that proposals for development will be assessed against the Cumbria Landscape Character Guidance and Toolkit, and the Plan attempts not to duplicate statements within policies, it is considered that the justification would benefit from such a reference.

Proposed Change New sentence at end of paragraph 5.65:
'The landscape impact of proposals will be assessed against the Cumbria Landscape Character Guidance and Toolkit'.

0740 Comment Policy 24

154/26/27 Mr Bryan Craig

Detail This policy is restrictive in so much as it precludes those people who have just set up a business and have not been trading for 2 years. It could also be said that if they have traded for 2 years without the workers housing then there is obviously no requirement.

Response The policy is written to ensure that provision is made for rural housing to meet an essential need for a rural worker, in accordance with policy in the NPPF. The criteria provide greater clarity to the policy, and guide the type of evidence that will be required to be submitted with the application. The policy aims to deliver housing that will be sustainable for the long term in meeting the identified need, and avoid such housing becoming redundant in the short term and therefore becoming open market housing in the open countryside. The NPPF states that isolated new homes should only be allowed in the open countryside in special circumstances. The policy sets out the special circumstances and the criteria ensure that the housing is delivered to meet only the need specified.
Up to one fifth of all business start ups in the UK fail each year. It is therefore necessary to ensure that a business is sound before a new house is built in the open countryside to house a rural worker.

Proposed Change No change to policy as a result of this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0612	Objection	Policy	24	114
128	Cllr John Mallinson	Carlisle City Conservative Group		
Detail	<p>Point 1: Is currently too restrictive and should be amended to say that evidence should be provided to demonstrate an employment need.</p> <p>Point 2: As the viability of a business is not a Planning consideration, this should be removed as it is too restrictive on rural businesses.</p>			
Response	<p>The policy is written to ensure that provision is made for rural housing to meet an essential need for a rural worker, in accordance with policy in the NPPF. The criteria provide greater clarity to the policy, and guide the type of evidence that will be required to be submitted with the application. The policy aims to deliver housing that will be sustainable for the long term in meeting the identified need, and avoid such housing becoming redundant in the short term and therefore becoming open market housing in the open countryside. The NPPF states that isolated new homes should only be allowed in the open countryside in special circumstances. The policy sets out the special circumstances and the criteria ensure that the housing is delivered to meet only the need specified.</p> <p>Up to one fifth of all business start ups in the UK fail each year. It is therefore necessary to ensure that a business is sound before a new house is built in the open countryside to house a rural worker.</p> <p>If a business is not viable it will fail, and there will be no need for a rural worker. If a property has already been built, there will no longer be a need for it to house a rural worker.</p>			
Proposed Change	No change to policy as a result of this objection.			
0016	Support	Policy	24	114 - 115
010	Richard Ritson	Chair of Kingwater Parish Council		
Detail	Somewhere for local workers to rent.			
Response	Support noted.			
Proposed Change				

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

0160 Comment Policy **24** 5.63
062 Church Commissioners for England A013

Detail 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 24, particularly the flexibility introduced as to what constitutes a rural worker (as set out in paragraph 5.63). However, we suggest that paragraph 5.67 is amended 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.

Response Agree that bullet point 2 in paragraph 5.67 should be amended to require marketing for 6 months rather than 8 as currently stated. This would reflect current practice requirements.

Proposed Change Amend '8 months' for '6 months' in bullet point 2 of paragraph 5.67.

0947 Comment Policy **25**

005 Paul Barton Clerk to Dalston Parish Council

Detail This policy should be retained and strengthened, in order to avoid new isolated homes in the countryside. Every case should be dealt with on its own merits.

Response Noted. The policy complies with the NPPF, whilst recognising that within Carlisle district is a large, sparsely populated and remote rural area extending to the Scottish borders in the north, and Northumberland in the east.

Proposed Change No change to policy as a result of this comment.

0741 Comment Policy **25**

154/26/27 Mr Bryan Craig

Detail A third item should be added to cover individual new build housing of exceptional Quality or innovative nature of design as stated in Section 55 of the NPPF.

Response It is considered that bullet point 4 of paragraph 55 of the NPPF makes adequate provision for such proposals.

Proposed Change No change as a result of this comment.

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

0080 Support Policy 25

034 Lucy Adamski Aoo8

Detail Support the principle of new housing being provided in the open countryside via the replacement of single dwellings or the conversion of structurally sound buildings as a means by which to contribute towards rural supply and avoid unsightly redundant and decaying buildings littering the countryside.

Response Support noted.

Proposed Change

1011 Comment Policy 25

194 Michael Barry Cumbria County Council

Detail 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. While the approach proposed is appropriate, it is also suggested that the policy could give preference to using buildings for commercial/live work purposes ahead of residential uses. This would reflect the traditional role of these buildings and could help facilitate the diversification of the rural economy. Under such an approach where a building cannot be feasibly used for commercial/live-work development, then residential uses could be considered appropriate.

Suggested Changes:

This policy could highlight a preference for rural building to be used for commercial/live-work development ahead of housing uses.

Response The NPPF at paragraph 55 states that new isolated homes in the countryside are acceptable 'where the development would re-use redundant or disused buildings and lead to an enhancement to their immediate setting'. It does not state that preference should be given to economic uses. The NPPF also states that isolated homes in the countryside can be created through the conversion of a heritage asset where it would represent the optimal viable use, or it would be appropriate enabling development to secure the future of heritage assets. It is considered that to stipulate that preference would be given to commercial uses would be contrary to the spirit of the NPPF.

Proposed Change No change to policy in response to this objection.

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

0613 Objection Policy 25

128 Cllr John Mallinson Carlisle City Conservative Group

Detail This Policy as shown in the consultation documents is not wholly in keeping with the NPPF. Section 55 of the framework allows for new houses to be built in open countryside if they are of exceptional quality and/or innovative design. Policy should be amended to include this.
Page 116 para 5.76: The requirement for the sustainability test in relation to the application should be removed.

Response It is considered that bullet point 4 of paragraph 55 of the NPPF makes adequate provision for the development of houses which are of exceptional quality or innovative nature of design.

The sustainability test is considered necessary as the district of Carlisle extends over 400 square miles, and there are remote rural areas which are sparsely populated and poorly serviced. The Plan does not intend to prevent the conversion of remote rural buildings. However, it is considered that the requirements in paragraph 5.76 are relevant to such applications. For example, if a building proposed for conversion is a significant distance from the road network, the Council will need to assess the impact that the construction of an access track will have on the landscape/biodiversity. However, for clarity, rather than implying the need for a 'sustainability test', with the perception that it could be failed, the wording in the policy and paragraph 5.76 could be amended to make clear that it is a requirement for additional information in order to assess the impact of the proposal, rather than a 'test'.

Proposed Change Last line of policy:
'Proposals for the conversion of very remote rural buildings will require additional information to be submitted with the application as set out in paragraph 5.76. 'Very remote' is considered to be more than 10 miles from a settlement with a shop'.
Paragraph 5.76, delete 'a sustainability test'. Insert 'additional information'.

0765 Support Policy 25

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change

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

0017 Support Policy 25 116 - 117

010 Richard Ritson Chair of Kingwater Parish Council

Detail Construction opportunities means keeping local businesses going.

Response Support noted.

Proposed Change

0161 Comment Policy 25 5.76

062 Church Commissioners for England A013

Detail Whilst we support the inclusion of Policy 25 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.

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.

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), would secure this.

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 25 and paragraph 5.76 of the supporting text.

Response The sustainability test is considered necessary as the district of Carlisle extends over 400 square miles, and there are remote rural areas which are sparsely populated and poorly serviced. The Plan does not intend to prevent the conversion of remote rural buildings. However, it is considered that the requirements in paragraph 5.76 are relevant to such applications. For example, if a building proposed for conversion is a significant distance from the road network, the Council will need to assess the impact that the construction of an access track will have on the landscape/biodiversity.

However, for clarity, rather than implying the need for a 'sustainability test', with the perception that it could be failed, the wording in the policy and paragraph 5.76 could be amended to make clear that it is a requirement for additional information in order to assess the impact of the proposal, rather than a 'test'.

Proposed Change Last line of policy:
 'Proposals for the conversion of very remote rural buildings will require additional information to be submitted with the application as set out in paragraph 5.76. 'Very remote' is considered to be more than 10 miles from a settlement with a shop'.
 Paragraph 5.76, delete 'a sustainability test'. Insert 'additional information'.

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

0259	Comment	Policy 25	5.76	116
073	Mrs Sarah Kyle		Clerk to Hethergill Parish Council	
Detail	<p>Hethersgill Parish Council are very concerned over this statement. It is felt that the implications of this are that the given sustainability criteria can determine whether or not a property is suitable for conversion where in reality, this could be in fact far too judgemental and generalised for the rural population and their individual needs which may not be fully understood or be able to be calculated.</p> <p>Hethersgill Parish Council would like to stress that there are many areas where the sustainability test may be in theory failed but the property may be viable for the applicant who prefers that particular isolated lifestyle. Councillors felt that the statement was far too dictatorial and a case-by-case basis would be far more sympathetic to determining rural needs.</p>			
Response	<p>The sustainability test is considered necessary as the district of Carlisle extends over 400 square miles, and there are remote rural areas which are sparsely populated and poorly serviced. The Plan does not intend to prevent the conversion of remote rural buildings. However, it is considered that the requirements in paragraph 5.76 are relevant to such applications. For example, if a building proposed for conversion is a significant distance from the road network, the Council will need to assess the impact that the construction of an access track will have on the landscape/biodiversity.</p> <p>However, for clarity, rather than implying the need for a 'sustainability test', with the perception that it could be failed, the wording in the policy and paragraph 5.76 could be amended to make clear that it is a requirement for additional information in order to assess the impact of the proposal, rather than a 'test'.</p>			
Proposed Change	<p>Last line of policy: 'Proposals for the conversion of very remote rural buildings will require additional information to be submitted with the application as set out in paragraph 5.76. 'Very remote' is considered to be more than 10 miles from a settlement with a shop'. Paragraph 5.76, delete 'a sustainability test'. Insert 'additional information'.</p>			

0289	Comment	Policy 26		
077	Mr Alan Hubbard		National Trust	
Detail	<p>The detailed wording of the policy does not appear to contemplate that such development could enhance the historic environment. A suggested minor amendment to address this is set out below.</p> <p>"2 The proposal does not significantly adversely affect the special interest and characteristics of the building"</p>			
Response	<p>Agree that the proposed change adds clarity.</p>			
Proposed Change	<p>Criterion 2 - insert 'adversely' between 'significantly' and 'affect'.</p>			

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

0766 Support Policy 26

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change

0081 Comment Policy 26

034 Lucy Adamski Aoo8

Detail Support the inclusion of such a positive policy geared towards safeguarding heritage assets whilst acknowledging that an element of new-build development may well be required to enable the preservation of heritage assets. Strand 3 to the policy may need to be refined on the basis of determining what constitutes an adequate size building to convert as, at present, it is considered to be open to too much interpretation.

Response Agree that criterion 3 requires further clarification. It is considered that this should be provided in the justification to the policy by adding a new paragraph after paragraph 5.86.

Proposed Change 'The building to be converted should be capable of providing adequate internal living space (kitchen/bathroom, living space etc) without the need for extensions, unless it can be demonstrated that such an extension would not have a significant adverse effect on the character of the building. An assessment of the character and setting of the heritage asset will have been submitted as required by criterion 1. It is important that the significance of the heritage asset is enhanced or better revealed in any alterations or extensions'.

0948 Comment Policy 26

005 Paul Barton Clerk to Dalston Parish Council

Detail This policy is acceptable

Response Noted.

Proposed Change

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

1012 Comment Policy 26

194 Michael Barry Cumbria County Council

Detail This policy is important as it serves to establish a mechanism through which important heritage assets can be protected. This is a tool acknowledged within the NPPF, and subject to a minor amendment, this policy is considered appropriate.

Suggested Changes:

Point 5 of this policy should be amended to state: "Adequate access and appropriate car parking are provided."

Response It is not considered that the suggested change adds clarity to the policy.

Proposed Change No change to policy as a result of this objection.

0364 Comment Policy 26

088 Elizabeth Allnutt Save Our Streets

Detail If at any time the Old Fire Station, Police Station and Magistrate's Court were proposed for development as housing SOS would endorse the principles in this policy. In terms of enabling development SOS would expect 3. and 4. to be strictly adhered to as the buildings in question are all in public ownership.

Response Noted.

Proposed Change

0507 Comment Policy 26

119

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 delivering a number of other planning objectives.

The policies covering the different types of heritage assets (see comments below) should be the main policy used to assess the 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.

Therefore, this policy should be deleted.

Response Whilst there is some merit in the approach suggested, the policies in the Plan are not to be read in isolation from each other. The policies in the housing chapter aim to deliver housing through a variety of ways, and provision is made for different circumstances whether development in gardens, conversion of buildings, on the edge of villages etc. The housing chapter is intended to be comprehensive. There are a significant number of heritage assets within the district, and a number of planning applications are received to convert such buildings to housing. This policy is best placed in the housing chapter, and will be read in conjunction with other policies protecting heritage assets.

Proposed Change No change to policy as a result of this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0949	Objection	Policy	27	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	Not particularly well worded. Concerns over density. Every case should be dealt with on its own merits.			
Response	The criteria are written to be as specific as possible. The first four criteria will influence/protect against inappropriate density for an area. Criterion 4 to be re-drafted for greater clarity.			
Proposed Change	4. there is no unacceptable loss of living conditions to surrounding properties by overlooking, loss of light, overbearing nature of the proposal or increase in on-street parking.			
0365	Comment	Policy	27	
088	Elizabeth Allnutt	Save Our Streets		
Detail	The houses in Warwick Street are probably the only city centre dwellings which have gardens. These are extremely important for the residents, for heritage and amenity, air quality and wild life and biodiversity. SOS objects strongly to this Policy in principle and would insert a further criterion at the beginning: The effects of the removal of gardens which serve as greenspace for the benefit of residents, amenity, heritage and wild life are taken into account. Where the removal is deemed to be detrimental, development will not be permitted			
Response	The suggested change would not strengthen the policy beyond the requirements of criterion 2, which aims to ensure a safe and attractive garden area of a similar size and scale to those in the area, for both the proposed new, and the existing house.			
Proposed Change	No change as a result of this comment.			
1115	Objection	Policy	27	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	In the interests of clarity and for the avoidance of doubt it would be appropriate to include a further criterion within the policy stating that tandem developments will normally be unacceptable.			
Response	Paragraph 5.98 adequately covers this point.			
Proposed Change	No change to policy in response to this objection.			

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

0742 Comment Policy **27**

154/26/27 Mr Bryan Craig

Detail Check Para. 2 - is the wording correct.

Response As this comment is unclear, both criterion 2 and the second paragraph of the justification have been checked for clarity.

Proposed Change No change as a result of this objection.

0108 Objection Policy **27**

049 Mr D Nash

Detail in response to 'what you have told us' - "increased hard surfacing in gardens has the potential to contribute to flood risk and should be discouraged" the Draft would benefit by a positive comment as follows:
 - Gardens should not be paved, concreted hard surface for more than 50% of their surface.

Response Specific rules apply for householders wanting to pave over their front gardens.
 Planning permission is not required if a new or replacement driveway of any size uses permeable (or porous) surfacing which allows water to drain through, such as gravel, permeable concrete block paving or porous asphalt, or if the rainwater is directed to a lawn or border to drain naturally.
 If the surface to be covered is more than five square metres planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.
 It is considered that permitted development rights adequately cover the issue raised by the objector.

Proposed Change No change to policy as a result of this objection.

0700 Comment Policy **27**

150/22 Mr Ian Yates

Detail The proposals for development in Residential Gardens ought to apply equally to proposed development in the large gardens of commercial premises e.g. large country houses which have been turned into offices or hotels or private schools etc.

Response The policy has been written in response to a particular issue that was raised mainly as a result of the Rural Masterplanning work with rural communities. Many village residents were concerned that development in residential gardens was altering the character of villages, resulting in a more cramped feel, and a loss of openness.
 Planning applications for housing in the grounds of other premises (offices or hotels) would be assessed under Policy 20 - Housing Development.

Proposed Change No change as a result of this objection.

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

1013 Comment Policy 27

194 Michael Barry Cumbria County Council

Detail Gardens were recently removed from the definition of previously developed land. This policy however, helpfully sets out the parameters against which proposals for housing in gardens are to be considered and subject to a minor amendment, this policy is considered appropriate.

Suggested Changes:

Point 6 of this policy should be amended to state: "Adequate access and appropriate car parking are provided."

Response Noted.

Proposed Change No change to policy as a result of this comment.

0743 Comment Policy 27

154/26/27 Mr Bryan Craig

Detail Could Item 4 be re-worded or a new item added to cover 'the loss in levels of natural light' from any room within the building, garden or amenity space.

Response Agree that criterion 4 needs to be redrafted for clarity.

Proposed Change 4. there is no unacceptable loss of living conditions to surrounding properties by overlooking, loss of light, overbearing nature of the proposal or increase in on-street parking.

0305 Comment Policy 27

121

078 Mr Trevor Wilson

Detail Re statement 'adequate access and car parking can be achieved.'

We moved into our new house in March 2013. It is a new development. The current Carlisle Planning car parking policy seems to be 2 cars per household. Our house has come with covenants which should mean no parking of cars on the road, no parking of cars in the turning point. The road is just wide enough for 2 cars and just wide enough for the Carlisle City Council refuse and recycling lorries (and the planning application did include a 'map' showing that the Carlisle City Council lorries (mentioned specifically) could properly access the close.

We have 2 cars. Most of the properties have 2 cars, some have more. Thus I believe this development does not provide adequate car parking. The road should have been wide enough to park outside your house, allow the Carlisle City Council lorry to pass and not have any parking related restricted covenants.

Please bring this to the attention of the relevant planning officers and department when considering future developments.

Response Policy 35 is the main policy which makes provision for car parking in association with new development. Policies are not to be read in isolation from each other. When assessing a planning application under Policy 27, criterion 6 would ensure that the access and parking arrangements are assessed. Policy 35 would provide the detail on standards, and requires some clarification. ACTION - Policy 35

Proposed Change No change to policy as a result of this comment.

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

0508	Support	Policy 27	121	
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 delivering a number of other planning objectives. We support this policy that ensures that any development of residential gardens should have regard to local character and the historic environment.			
Response	Support noted.			
Proposed Change				

0366	Comment	Policy 28		
088	Elizabeth Allnutt	Save Our Streets		
Detail	SOS would support the principles in these policies, provided the additional provisos of the Conservation Area apply			
Response	Noted.			
Proposed Change				

0307	Objection	Policy 28		
078	Mr Trevor Wilson			
Detail	[Link to Rep 0308] I like the statement 'planning departments need to be open to modern designs for low carbon/passive haus buildings.' If you build to passive haus standards, then the energy efficiency is much higher than the current building regulations and thus energy bills are much lower. Our March 2013 house meets the applicable building regulations but I am disappointed that our energy bills are not much lower, in fact they are very similar to an updated 1960 house we previously sold.			
	Passive haus or similar standards should apply to all developments. Passive haus only appears in policy 28 – update the plan so that passive haus explicitly appears in other relevant sections.			
Response	This comment relates to feedback that we have received so far on this issue, not to Policy 28 and the policy justification. Passive Haus is one of a number of voluntary standards for energy efficiency in buildings. As such it can not be imposed through policy.			
Proposed Change	No change as a result of this objection.			

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

1014 Comment Policy 28

194 Michael Barry Cumbria County Council

Detail This policy sets out the criteria against which such proposals are considered. Subject to minor amendment this policy is considered appropriate.
Suggested Changes:
Point 4 of this policy should be revised to state: "Ensure there is no loss of amenity to surrounding properties by overlooking, overbearing nature of the proposal or increase in on street parking;"

Response Agree that suggested change adds clarity.

Proposed Change Criterion 4 to be amended to read:

4. 'ensure there is no loss of amenity to surrounding properties by overlooking, overbearing nature of the proposal, or increase in on street car parking caused by the loss of an existing garage or off street parking space'.

0950 Comment Policy 28

005 Paul Barton Clerk to Dalston Parish Council

Detail The policy is fine, however, the Government appears to have relaxed all rules in this area.

Response The justification to the policy draws attention to recent changes to PD rights. Paragraph 5.133 also makes clear that this policy applies to applications for development which are not covered by PD rights. The recent changes to PD rights apply between 30th May 2013 and 30th May 2016. As the Plan is intended to cover the period up to 2030, it is not intended to set out in detail recent changes to PD rights within the Plan.

Proposed Change Amend the 'Changes to Permitted Development Rights' section of the Justification to be less specific as follows:
5.109 Not all house extensions require planning permission. Delete second sentence. Move para 5.110 to glossary. Delete paragraph 5.111. Continue with text of 5.112. Keep 5.113.

0744 Comment Policy 29

154/26/27 Mr Bryan Craig

Detail Can we add something which will maintain the external character and appearance of the building. It is important that we define and protect important buildings and street scenes from this type of development.

Response The maintenance of the exterior of a building is largely outside planning control. Whilst Listed Building consent may be required for the painting of a listed building, and Building Act 1984, Sections 77 and 78, Section 79, Ruinous or Dilapidated Structures, may be of assistance in regarding dangerous structures, as may also the Local Government (Miscellaneous Provisions) Act 1982, Section 29 Protection of Buildings, planning policy can not require the maintenance of buildings.

Proposed Change No change to policy as a result of this comment.

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

0913 Comment Policy 29

189 Mrs Janet Whitworth University of Cumbria

Detail The University is keen to work with the City Council to ensure that there is adequate student accommodation in appropriately socially embedded locations and additional HMO properties to meet current and potential future demand. For example, if the student numbers continue to grow in Carlisle, we will require additional student accommodation, to negate the impact and demand on HMO properties and the wider private sector accommodation sector.

We recommend reference specifically to student accommodation in the policy (or even a separate policy for student accommodation) – to ensure that there is adequate provision for student growth, and demand for housing, which may be realised during the lifetime of the plan.

Response Student housing merits inclusion in this policy, in reflection of the University's comments regarding potential demand.

Proposed Change Policy renamed: 'Large Houses in Multiple Occupation; Subdivision of Dwellings; Student Accommodation'.

Part 2 of the policy to state:

'Proposals for student housing will have to demonstrate how they will contribute towards mixed and balanced communities. Such proposals must:

- a) not lead to the loss of existing good quality family housing;
- b) be supported by evidence of direct links with the University of Cumbria;
- c) not lead to an intensification of student accommodation/HMOs which would be detrimental to residential amenity, or place unacceptable pressure on local infrastructure;
- d) have good public transport or walking and cycling links to the University sites, and also to local services and facilities;
- e) provide adequate internal and external space standards including for the storage of bicycles, refuse and recycling bins;

Student housing will be subject to a planning obligation to ensure that it is only occupied by students attending a specified educational institution.

1015 Support Policy 29

194 Michael Barry Cumbria County Council

Detail This policy sets out the criteria against which such proposals are considered and is welcomed.

Response Support noted.

Proposed Change

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

0951 Comment Policy 30

005 Paul Barton Clerk to Dalston Parish Council

Detail The issue of Lifetime Homes Standards is not adequately defined. Does this apply to the person or to the property?

Response Agree that 'Lifetime Homes' is not adequately explained. Policy justification to amended as set out below.

Proposed Change Paragraph 5.127, after '... Individuals and families'. New sentences, 'Lifetime Homes are ordinary homes designed to include 16 design criteria that can be applied to new homes at minimal cost. Each design feature is intended to add to the comfort and convenience of the home, and support the changing needs of those who live there at different stages of their lives. Lifetime Homes are intended to be flexible and adaptable. They are designed to create and encourage better living environments for everyone, from small children to coping with temporary or permanent disability, or reduced mobility in later life. The Lifetime Homes website has further information on the 16 design criteria.

New paragraph 5.128 starting with, 'Housing for people with a range of special needs...'.

0767 Support Policy 30

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change

1016 Comment Policy 30

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
Working with the County Council, there needs to be further consideration about whether land to provide specialist housing accommodation should be identified.

Response Further discussions are needed to establish whether there is a need to allocate a site for specialist housing.

Proposed Change No change until further discussions completed.

ACTION.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0331	Objection	Policy	30	
o81		HS Cartmell	A013	
Detail	It is vital that the Council stipulate in their 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.			
Response	Policy 19 deals with the overall housing target for the district. Nursing homes are not included in the supply figures for housing. Student accommodation is only counted if self contained flats are being created.			
Proposed Change	No change to Policy 30 in response to this objection. Housing topic paper to set out how supply is counted.			
0162	Objection	Policy	30	
o62		Church Commissioners for England	A013	
Detail	It is vital that the Council stipulate in their 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.			
Response	Policy 19 deals with the overall housing target for the district. Nursing homes are not included in the supply figures for housing. Student accommodation is only counted if self contained flats are being created.			
Proposed Change	No change to Policy 30 in response to this objection. Housing topic paper to set out how supply is counted.			
0185	Objection	Policy	30	
o66	Revd. Canon Jan Kearton	The Governing Chapter of Carlisle C		
Detail	The Canon Warden and Canon Missioner are regularly approached by homeless persons seeking assistance with shelter accommodation, as available Carlisle shelters are full. We wonder whether the City Council is able to examine further the provision of shelters, perhaps by working in partnership and with multiple agencies to address the real needs of this group. We would add that we are not convinced by the argument that good shelter provision encourages homelessness within the City. We observe that, despite reference in the consultation notes, this Policy does not specifically address the needs of the homeless or those transferring from care or prison to low-cost, supported or unsupported accommodation.			
Response	Further discussions are needed with all the relevant agencies to establish whether there is a need to allocate a site for specialist housing. Email from CuCC 25/11 stating need to allocate site - discussion will follow with Adult Social Care.			
Proposed Change	ACTION			

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

0202 Objection Policy 30

070 Mr R Coad A013

Detail It is vital that the Council stipulate in their 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.

Response Policy 19 deals with the overall housing target for the district. Nursing homes are not included in the supply figures for housing. Student accommodation is only counted if self contained flats are being created.

Proposed Change No change to Policy 30 in response to this objection. Housing topic paper to set out how supply is counted.

0082 Comment Policy 30

034 Lucy Adamski A008

Detail Support the ethos of the policy but would suggest moving away from the term "special needs" and instead considering "lifestyle housing" or something similar. Also, "older people" as opposed to "elderly".
It is suggested that housing for older people need not always be in close proximity to a range of services and facilities. Older people's housing can range from the over 55s upwards, with car ownership and sharing being practised. There are then car clubs, communal mini-buses and green travel plans, which many developers of housing for older people use widely. Travel patterns also tend to vary as older people do not need to leave and return home at peak times for the purposes of work, school runs etc.

Response Agree - subtle changes to terminology.

Agree that policy does not recognise that older people can be supported by the community/family in their village.

Proposed Change Rename - Housing to Meet Specific Needs.
Second paragraph, replace 'the elderly' with 'older people'.
Last line, insert 'e.g.' before 'close to a range of...'.
In justification, new paragraph, 'Older people or others with specialist housing needs often want to stay within the community in which they have been living, or move to be close to family or others who are able to help support them. Whilst such locations may not benefit from local services and facilities, they are still considered sustainable in terms of the community/family support for the particular housing need'.

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

0701 Comment Policy **30**

150/22 Mr Ian Yates

Detail A Special Needs housing survey needs to be undertaken in relation to specialist housing for the elderly. It needs to be carried out at a local level to determine the needs, in the rural area, on a village by village basis. Housing for the elderly should be discouraged in locations which do not meet certain criteria e.g. Close to public transport, health & welfare facilities, leisure facilities, not at the top of a hill etc.

Response The City Council does not have the resources to carry out specialist housing surveys on a village basis. This is something that communities may be able to do for themselves, either through neighbourhood or community plans. The locations in which the respondent seeks to discourage housing for the elderly does not take account of community/family support for the elderly within their village.

Proposed Change No change in response to this objection.

0214 Objection Policy **31**

072 Miss Alice Unsworth NFU

Detail While this sounds amicable, the reassurance that these sites do not include any agricultural land would be appreciated. The NFU would also like to see the inclusion of a further point establishing the need to provide adequate land for the associated livestock which fully meets their needs, thus reducing the possible negative impact on the surrounding agricultural land by fly grazing, which is both trespass and a biosecurity hazard.

Response Discuss with Helen.

Proposed Change

1116 Objection Policy **31**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail In the interests of clarity and for the avoidance of doubt it would be beneficial to extend the terms of reference to include a criterion prohibiting the carrying out of industrial activities/processes - rather than specifying only 'business uses'. Such a measure would more effectively protect the quality of life and residential amenity of site residents and nearby communities.

Response It is considered that criterion 8 makes adequate provision for the protection of site residents and adjacent land uses.

Proposed Change No change to policy in response to this objection.

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

1017 Comment Policy 31

194 Michael Barry Cumbria County Council

Detail Within the Government's guidance contained within Planning for Traveller Sites (March 2012) it is stated: 'Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities'.

While this policy does bring benefit, its scope should be broadened to include sites for Travelling Showpeople.

New evidence that is being developed on a County-wide basis will quantify needs for new Gypsy, Traveller and Travelling Showperson accommodation in Carlisle. Using this data, it will be essential that Carlisle City Council identify sufficient sites to meet the requirements within their authority area.

Suggested Changes:

The policies title should be revised to state "Gypsy, Traveller and Travelling Showperson Provision.

Response New evidence has been produced to assess the needs for traveller (and travelling showpeople) accommodation. The evidence has been compiled on a county wide geographical basis. It identifies the need for additional pitches within Carlisle District. The policy will be amended to identify a site to accommodate these needs. In addition the policy will refer to travelling showpeople.

Proposed Change Policy title amended to 'Traveller and Travelling Showpeople Provision'.

Site allocated for travellers within policy.

Criterion 5 amended by addition of word 'screening' after 'landscaping'.

0591 Comment Policy 31

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail Travellers: An up date of the county-wide needs assessment is close to completion. At this stage both Local Authorities intend to provide for the need with their plan area.

Response Noted.

Proposed Change The policy will be amended to allocate a site for travellers to meet the need identified in the Oct 2013 GTAA.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
o863	Support	Policy	31	
174/48/49	Mrs Olwyn Luckley			
Detail	I SUPPORT THE POLICY BUT WOULD ASK TO BE CONSIDERED TWO SUGGESTIONS. 1. THE SITE SHOULD HAVE GOOD VEHICULAR ACCESS, SUITABLE FOR LARGE VEHICLES AND CARAVANS 2. PROPOSAL NO. 5 TO READ "THE SITE SHOULD HAVE SUBSTANTIAL NATURAL SCREENING OR INCLUDE PROPOSALS TO PROVIDE SUCH SCREENING"			
Response	Additional criteria to be added covering access and landscape screening.			
Proposed Change	Criterion 5 to be amended, 'the site has existing landscape screening, ...' Criterion to be added, 'the site should have, or be able to provide, adequate access for caravans and other large vehicles'.			
o952	Objection	Policy	31	
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	This policy should state that the objective is to provide domestic accommodation for travellers. Number 7 should be strengthened to include waste disposal. Number 8 should be stronger and should prohibit the development of businesses on these sites. The same rules for water, sewage and infrastructure should apply to these site as apply to everyone else.			
Response	Government policy in respect of Travellers states that the overarching aim to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. Therefore the policy should not aim to provide domestic accommodation for Travellers. It is considered that criteria 7 and 8 do not need to be amended.			
Proposed Change	No change in response to this objection.			
o857	Objection	Policy	31	131
173	Cllr Bloxham			
Detail	Is this a change in policy as the Harker site or the sandesykes does not conform to the policy being proposed.			
Response	The policy has been written to comply with the Government's planning policy for traveller sites.			
Proposed Change	No change in response to this objection.			

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

0614	Objection	Policy	31	5.132	132
128	Cllr John Mallinson			Carlisle City Conservative Group	
Detail	The last sentence of this paragraph incorrectly states that there will be "...a permanent site for Travelling Showpeople at Willowholme." This is a permanent site for people of the Showman's Guild.				
Response	Accepted.				
Proposed Change	Last sentence of paragraph 5.132 amended as follows: "There is also a permanent site for people of the Showman's Guild at Willowholme in Carlisle'.				

0768	Support	Policy	32		
156/29-31	Mr Viv Dodd			Cumbria Business for Business	
Detail	Support				
Response	Comment of support noted.				
Proposed Change	No proposed change as a result of this comment.				

1018	Support	Policy	32		
194	Michael Barry			Cumbria County Council	
Detail	This policy contains flexible criteria to be used to consider proposals for alternative purposes in residential areas.				
Response	Comment noted.				
Proposed Change	No proposed change as a result of this comment.				

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

0953 Comment Policy **32**

005 Paul Barton Clerk to Dalston Parish Council

Detail This policy is very vague

Response Comments are noted. It is considered that this Policy is vague in order to protect Primary Residential Areas from 'any' form of development that would have a negative impact in terms of noise and traffic increase.

Proposed Change No proposed change as a result of this comment.

1117 Objection Policy **32**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail Criterion 3 states that the amenity of residential areas will be protected from inappropriate development leads to an unacceptable increase in traffic or noise. It would be appropriate to include, at criterion 3, reference to unacceptable increases in vehicular and or pedestrian traffic.

Response It is considered that keeping criterion 3 as 'leads to an unacceptable increase in traffic or noise' covers all types of traffic and it is therefore not necessary to differentiate the type of traffic (vehicular/pedestrian).

Proposed Change No proposed change in response to this comment.

0808 Support Policy **32**

158/33 Mrs Julie Templeton

Detail I agree with this policy

Response Comment of support noted.

Proposed Change No proposed change as a result of this comment.

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

0306	Comment	Policy 35	6.22 & 6.29	142
078	Mr Trevor Wilson			
Detail	<p>Re Para 6.22. We have a garage 2.7m wide so it does not count as a car parking space but whilst you can get a car in, the garage is not used as a garage but more a storage space and diy workspace. How many people use a garage to their car – not many.</p> <p>Re Policy 35. Para 6.29. I agree with the statement that attempting to increase the use of public transport by restricting car parking sounds a good idea but does not work</p> <p>Please bring this to the attention of the relevant planning officers and department when considering future developments.</p>			
Response	<p>Noted. Planning guidance is aware that garages are increasingly less used for car parking and more for storage. This will be taken into account when considering parking standards.</p> <p>The Council has also recognised the issues associated with restricting car parking in the past, hence the preferred option of the policy is to ensure that rather than limiting the amount of spaces a development can provide, a minimum standard should be applied to ensure developers provide a certain number of spaces.</p>			
Proposed Change	No change.			

0970	Comment	Policy New		
005	Paul Barton		Clerk to Dalston Parish Council	
Detail	<p>Dalston PC would like the following policy incorporated into the Local Plan - Policy 4: Land Between Townhead and Station Road Site allocated for residential development. Housing mix should have reflected the Dalston Housing Needs Survey to include more 2 bedroom down-sizing dwellings and more affordable homes.</p> <p>Dalston PC Policy 6: Land at Ellers Mill : Site allocated for future mixed use or residential development. Justification: This is the site of an old mill which played an important part in Dalston's past. In recent times it has become less viable as a place for employment. Although the site is some distance from the centre of the village, it is an existing brownfield site that would lend itself to an attractive residential or mixed-use conversion.</p>			
Response	<p>Land between Townhead Road and Station Road has been included as a preferred options allocation in Policy 19. It will not require a separate policy. As far as the Council is aware Ellers Mill remains a functioning employment site, and as such the Plan would not seek to allocate it for residential development.</p>			
Proposed Change	Land between Townhead Road and Station road allocated as a preferred option for residential development in Policy 19.			

RepNo	Status	Paragraph	Page	Map
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Consultee Ref No	Consultees.Contact	Organisation	Agent
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REPRESENTATIONS

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

Chapter o6

0574 Comment Policy

123 Sarah Kyle Clerk to Scaleby Parish Council

Detail The lack of information or policy on a cycling infrastructure was of concern. The Parish Council also felt that there was a lack of evidence cited to support the Big Green City/Green Infrastructure Strategy.

Response The Big Green City/Green Infrastructure Strategy is the evidence that has been used to support the Green Infrastructure policy and chapter, and is available for inspection.

Cycling provision and infrastructure is included within the Sustainable Transport policy which lists it as a key consideration for development to be outlined within Travel Plans/Transport Assessments. Cycling infrastructure is mentioned specifically within strategic policy S4: Green Infrastructure, which states that new development should be integrated with existing cycle routes and seek to create new routes where possible.

Proposed Change No change.

0335 Comment Policy

o82 David Johnston Clerk to St Cuthbert Without Parish

Detail Following the overwhelming success of the northern relief road we would like to see plans for a southern by pass come to fruition much more speedily with a view to further reducing traffic problems in and around the City of Carlisle

Response Noted. This will form part of the vision for Carlisle South, and is considered an important infrastructure project for the city. Greater reference to it will be included in a new Carlisle South policy.

Proposed Change No change to Chapter Six. Reference to a southern bypass will be included in a new Carlisle South policy.

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

0367	Comment	Policy		
088	Elizabeth Allnutt	Save Our Streets		
Detail	<p>Issues around Infrastructure which particularly affect Rickergate are: Flood defences and mitigation measures – the area was extensively flooded in 2005 Public Transport Accessibility given its proximity to the bus stop area in West Tower Street Off-street parking – the parking areas in the vicinity of Corporation Rd are important for the viability of the small businesses in Rickergate Landscaping – Existing, limited greenspace and planting is welcome and should be retained. Meaningful comment is restricted by the absence of the complete Infrastructure Delivery Plan, the area specific proposal for the Local Transport Plan 3 and the City Centre Master Plan</p>			
Response	Noted. Policies will seek to address these issues through developer contributions, where appropriate, as and when development occurs within the Rickergate area.			
Proposed Change	No change.			

0171	Comment	Policy		
063	Ms Rose Freeman	The Theatre Trust		
Detail	<p>With reference to the 'What you told us' box at the top of page 136, our comment is that the National Planning Policy Framework states at item 156 that Local Plans should set out strategic priorities to deliver the provision of health, security, community and cultural infrastructure and other local facilities.</p> <p>We therefore suggest for clarity, and so that guidelines are clear and consistent, that the Glossary contains an explanation for the term 'Community facilities and other services' that is one of the bullet points in para.6.4 on page 137. We recommend this succinct all-inclusive description which would obviate the need to provide examples: community facilities and other services provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</p>			
Response	Noted. Clarification of this can be provided			
Proposed Change	Update justification of policy 33 to include definition of 'community facilities and other services'			

0894	Comment	Policy		
187	Ken Hind	Clerk to Kingmoor Parish Council		
Detail	The Transport Plan. We should talk about the proposed de-trunking of the A69 or a bypass. This whole document will not work if the infrastructure goes wrong.			
Response	Noted. The Highways Agency is responsible for the A69 and any proposals for the de-trunking of it. The remit of this Local Plan does not cover the classification of the A69. Any proposals for a change in its status will be considered in terms of potential impact upon the delivery of the plan if/or when we are made aware of them.			
Proposed Change	No change.			

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

0273	Objection	Policy		
075	Bob Allen	Brampton & Beyond Community Tr		
Detail	<p>There are also other policies and infrastructure issues for both Brampton and the wider area, which are simply not touched by the plan, in terms of either future infrastructure or the potential for the use of land. The Trust is particularly interested in the potential to strengthen and protect the area's community, economy and natural resources, to make it more self-reliance and resilient. This should build on the Localism Act in terms of delivery, and would include matters such as community support, local food supply, local energy generation and sustainable diversification of the economy, leading to a planned approach to future policies and land use to address these issues. The future of business support and infrastructure, including office/workspace provision, is an example of a lack in provision to which the Trust is seeking to make a contribution.</p>			
Response	<p>Acknowledged. The infrastructure policies do aim to ensure that required services and facilities are in place before a development can take place. Reference can be made to things like community gardens within the lists of infrastructure in the Delivering Infrastructure/Planning Obligations policy.</p>			
Proposed Change	<p>Reference community gardens within Delivering Infrastructure/Planning Obligations policies.</p>			

0109	Objection	Policy		
049	Mr D Nash			
Detail	<p>Reference is made to developing a link to the M6 J 42 and alleviating the traffic through Dalston, I note the projected benefits that this may bring. However I am unable to not any reference in the Draft Plan to improving the infrastructure between the A6 and Scalegate Road, there is a clear need to improve the traffic flow and Railway bridge along this route, to provide suburb access.</p> <p>In developing infrastructure, I note that the Draft identifies additional housing in a number of areas, including proposals for Scotby & Botcherby, however there is no comment regarding the access to those areas from the Warwick Road. Currently Victoria and Durranhill Road are facing increases in traffic, past the school and considerable difficulties in accessing the A69. The Infrastructure section should comment on the need for impact traffic assessments, not only in the immediate access to the new developments, but also "Downstream".</p>			
Response	<p>Noted. Highway improvements are the responsibility of the County Council, as the highways authority. There is no reference within the Local Transport Plan to improvements to the A6 and Scalegate Rd, therefore it has not been mentioned in the Plan. The majorly strategic southern link road from J42 does have passing reference in the LTP and would result in highly significant planning issues for the city and district - hence it is mentioned in the Local Plan.</p> <p>Junction 43 has not been flagged as an area of concern by the highways authority, it is therefore not mentioned as a strategic transport issue within the Local Plan. Wording can, however, be included in Policy 34 highlighting the need for travel plans and transport assessments to consider the wider impact of development on the local transport network.</p>			
Proposed Change	<p>Wording to be added to Policy 34 on Travel Plans/Transport Assessments highlighting the need to consider the wider impact of development on the transport network.</p>			

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

0403 Comment Policy

094 Cllr Betton

Detail I am also concerned regarding section 38 agreements and adoption of new build estates, could it be encouraged that every new build estate is adopted?

Response The adoption of streets and roads through section 38 agreements is the responsibility of Cumbria County Council as the Highways authority, with Carlisle City Council having limited influence on what is and is not adopted. Wording can be included to outline the relationship the Council has with Cumbria Highways on this matter and the need for a continued collaborative approach to highway adoption.

Proposed Change Include wording in Sustainable Transport policy stating the Council's intent to work with County to help ensure new highways that meet the County's standards are adopted where appropriate.

0260 Support Policy 33

073 Mrs Sarah Kyle Clerk to Hethergill Parish Council

Detail Hethersgill Parish Council fully support having the correct highway capacity for developments but we would like to re-iterate that it is fundamental to maintain the existing infrastructure in an appropriate standard.

Response Acknowledged.

Proposed Change No change.

0769 Support Policy 33

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change N/a

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0456	Support	Policy	33	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	FLD strongly supports the list of "other infrastructure" laid out in Paragraph 6.4 particularly relating to flood defences and mitigation measures, green infrastructure connections, landscaping and replacement/new habitat. We would like to see it made clear that all of these measures should be put in place prior to the development commencing.			
Response	Support noted. The justification text can be changed to clarify that infrastructure issues should be addressed before development can commence.			
Proposed Change	Update justification to clarify that infrastructure provision should be in place before development commences.			
0118	Comment	Policy	33	
051		Story Homes Ltd		A010
Detail	The lack of viability assessment for review makes comment difficult. However Story Homes would seek to ensure that all relevant information is transparently assessed and would welcome an opportunity to play an active role in any discussions.			
Response	Noted. A viability assessment is underway. It will be consulted on alongside the revised preferred options in the Spring of 2014.			
	Early engagement and pre-application discussions are also welcomed by the Council and underpin the principles of Development Management.			
Proposed Change	No change			
0378	Objection	Policy	33	
089	Elizabeth Allnutt	National Allotments Society		
Detail	6.4 Other infrastructure requirements: Allotments should be listed specifically here. The Infrastructure Delivery Plan does not currently recognise the deficit of allotment plots to meet increased demand nor does it address how this deficit will be met – direct provision by the local authority or CIL/developer contributions. It is impossible to comment on this meaningfully without a complete and comprehensive Infrastructure Delivery Plan			
	Suggest: Include allotments in 6.4 as part of other infrastructure requirements and Complete and publish the Infrastructure Delivery Plan ensuring that the allotment deficit and how this is to be addressed, are included.			
Response	Agreed - allotments can be listed specifically in the policy. Also, the IDP is still work in progress. Allotment provision can and will be considered by it.			
Proposed Change	Include allotments within list of infrastructure for policy 33. Include reference to allotment provision within the IDP.			

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

0954 Comment Policy **33**

005 Paul Barton Clerk to Dalston Parish Council

Detail Makes Sense

Response Support noted.

Proposed Change No change.

0718 Support Policy **33**

151/23 Mr Bob Sharples Sport England

Detail Sport England wishes to register it's support for this this policy. In paragraph 6.4, we would advise that the wording concerning the following bullet point is changed from: Replacement or new open space/sports facilities to Replacement or enhanced or new open space/sports facilities. We believe that this would make the policy more robust and could reflect the emerging sports strategy if it shows need for new facilities through the housing growth, but only enhancements to the existing stock.

Response Agreed. Text will be amended

Proposed Change Update text in line with recommended amendment.

1019 Objection Policy **33**

194 Michael Barry Cumbria County Council

Detail Background information submitted. Suggested Changes:
 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 consider the potential infrastructure requirements of proposals in Carlisle City Centre and to the South of City.

It is also suggested that the first paragraph of the proposed policy be amended to state:

"New development will not be permitted:-

- where there is insufficient infrastructure available to support the proposed development; or
 - where the proposed development would place unacceptable strain on existing infrastructure;
- Unless arrangements can be made for the required infrastructure as the development is progressed."

New development would be not permitted on land required to provide infrastructure required to support the delivery of the plan".

Response Agreed - the City Council will continue to work closely with the County Council to ensure that the IDP remains robust and relevant. Amendment to Policy 33 will also be made to protect land set aside for new infrastructure.

Proposed Change Amend Policy 33 to protect land set aside for new infrastructure

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

0407 Objection Policy 33 136

095 Jenny Hope United Utilities

Detail With regards to Policy 33 and the delivery of infrastructure, we would like to highlight the need for engagement with United Utilities by all parties at the earliest stage. This is encouraged to ensure that any development aspirations can be met without any delay due to the lack of existing infrastructure or the need for significant upgrading. Early negotiation with us at the pre-application stage will also ensure proposals are designed in a manner that can be considered acceptable to all parties.

Response Noted. Words to encourage early engagement with statutory consultation bodies will be included within the text.

Proposed Change Include wording to encourage early engagement with statutory consultation bodies.

0509 Objection Policy 33 6.2 - 6.8

104 Emily Hrycan English Heritage North West

Detail Paragraph 126 of the National Planning Policy Framework (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. English Heritage recognises the importance of a levy on new development as a source of funding to deliver the infrastructure required to underpin the sustainable development of Carlisle District. With regards this Policy (and justification), we would welcome inclusion of general improvements to parks and gardens, as some of them are historic and the protection and enhancement of these would be welcomed. We would also encourage you to recognise the contribution the public realm makes to the historic environment and would therefore welcome reference to this within the Plan. Its enhancement would have a positive impact on these areas including conservation areas.

Suggest: The Plan should be amended to include two new requirements in Para 6.4: Parks and Gardens Public Realm

Response Agreed. This can be added to text.

Proposed Change Add parks and gardens, as well as public realm to list of infrastructure in Policy 33.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0063	Objection	Policy	33 & 40	
033	Matthew Good	Home Builders Federation		
Detail	<p>The policies are considered unsound as they are not justified by evidence and appropriate alternatives have not been considered. Policies 33 and 40 both relate to the provision of infrastructure and planning obligations. It is noted that the Council are considering the introduction of CIL. In doing so the Council must undertake a thorough viability assessment to ascertain the appropriate level of CIL which can be levied without unduly burdening development. It is important that such requirements are not set at the limits of viability as this will only serve to constrain development. As noted in comments against Policy S4 above if CIL is adopted this should be the only tool for collecting funds to address the cumulative impacts of development on types of infrastructure. The recent Government guidance upon CIL states in paragraph 15 that; 'The charging authorities should also set out those known site-specific matters where section 106 contributions may continue to be sought. The principal purpose is to provide transparency on what the charging authority intends to fund in whole or part through the levy and those known matters where section 106 contributions may continue to be sought'.</p> <p>The policy therefore should explicitly explain the relationship between CIL and section 106 contributions. Funds received through section 106 agreements will need to relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development. They should not seek to rectify existing deficits or wider strategic infrastructure issues. The Council will be aware that the current CIL regulations limit the use of pooled planning obligations collected through section 106 procedures to five from April 2014 or local adoption of CIL, whichever is sooner. It does, however, appear likely that the April 2014 date will be pushed back at least one year.</p> <p>The policies also need to closely relate to an up to date Infrastructure Delivery Plan (IDP). The Council's current IDP identifies a significant infrastructure list, it is important that the IDP is realistic in its aspirations as given the current period of austerity it appears unlikely that all of the infrastructure indicated will be delivered. The Council should consider how much funding, from a variety of sources, it can reasonably expect and then prioritise its infrastructure on this basis to ensure delivery. This prioritisation should be based upon the deliverability of the infrastructure and its ability to positively support new development.</p> <p>Recommendation: It is recommended that the Council reconsider both policies in the context of the impending plan wide assessment of the cumulative economic impact of all policies and obligations upon development in Carlisle. The policies should also explicitly explain the proposed relationship between CIL and section 106 contributions.</p>			
Response	<p>Noted. Further clarification between the role of CIL and S106 agreements will be included within the Policy justification. Policy 40 specifically mentions that developer contributions in any form should not make the proposed development unviable. The Council is currently working on an Economic Impact/Viability Assessment of the policies within the plan, which will assess the economic requirements placed on developers through policy. It will be used to inform policy amendments and decisions on contributions as part of planning permissions.</p>			
Proposed Change	<p>Clarification of the differences between CIL and S106 to be included within policies 33 and 40.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0368	Comment	Policy	34	
088	Elizabeth Allnutt	Save Our Streets		
Detail	While for the most part recognising that sustainable transport is an excellent objective, Rickergate residents and small business people have concerns about what is proposed for the bus stop area on West Tower St and how any proposals for this would impinge on their neighbourhood. Until more details are known further comment is not meaningful.			
Response	Noted. The City Centre Masterplan may contain recommendations for proposals on this.			
Proposed Change	No change.			
0702	Comment	Policy	34	
150/22	Mr Ian Yates			
Detail	The Plan should set out specific, detailed proposals and routes for the establishment of a network of cycleways throughout the rural area, to be built within the lifetime of the Plan.			
Response	Noted. Unfortunately Carlisle City Council does not build cycleways and can only really respond to proposals from external bodies. Proposed routes can and should only be included within the plan once their deliverability can be confirmed so that the routes can be protected from development. We currently have no information on any proposed new routes.			
Proposed Change	No change.			
0411	Comment	Policy	34	
096	Rob Naples	Northumberland County Council		
Detail	While it is recognised that Carlisle City Council is not the Highways Authority for the area, the Local Plan could include recognition of the importance of cross-border linkages such as the M6, A69, A7, as well as rail infrastructure such as the West Coast Main Line and the Carlisle-Newcastle line.			
Response	Agreed.			
Proposed Change	Reference to important cross border transport linkages to be included in policy justification.			

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

0457 Support Policy **34**

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District supports the policy on sustainable transport. We consider that it would be worth making the links with green infrastructure provision more overt in the justification section.

Response Support noted, and agreed more emphasis can be placed on GI links in the justification.

Proposed Change Provide more emphasis on links with green infrastructure within the justification.

0265 Comment Policy **34**

074 Tim Coombe Sustainable Brampton

Detail Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.

Rural communities spend a higher proportion of their disposable incomes on transport than on either electricity or heat. Sustainable transport is acknowledged in Objective 11 of the SA to help promote healthier lifestyles but spiralling transport costs nationally are already significantly affecting the wider sustainability and economic resilience of those living in remote rural areas. Policies are urgently required to help reduce future transport costs in areas where limited or no public transport is ever likely to exist. Electric bikes and cars offer one potential solution for rural transport as does converting vehicles (even tractors) to use methane as a fuel (methane being an important by-product of an AD plant). Innovative thinking will be required to provide solutions that address these long term issues and their importance should be reflected in the priority given to the provision of a 21st Century transport infrastructure and non-fossil fuel based forms of transport in the Local Plan for rural areas.

Response Acknowledged. The Plan seeks to support sustainable transport opportunities across the borough, particularly through walking, cycling and public transport. Policy 34 also discusses how developers will be encouraged to consider the inclusion of infrastructure required to support electric vehicles. However, until these vehicles become more widely used it would be excessively inappropriate to consider the inclusion of charge points within development as a mandatory requirement.

Proposed Change No change.

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

0974 Objection Policy **34**

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail 'new development focused shall be in the areas with greatest availability of services' and 'Development in areas within isolated and poorly accessible areas will be resisted'.
Question - these 2 sentences as being is too restrictive, it should be ALL village inclusive policy. This will not allow the rural villages to develop and improve transport links.

2nd paragraph - provide safe & convenient access to cyclists and pedestrians - why only new developments?

The whole of Wetheral parish is within easy reach of Carlisle, yet there is no provision or mention of any provision for adequate cycle routes into the town.

There is no point in discussing the needs of cyclist on new development sites if it's unsafe for them when they travel off the site.

This is another example of where the plan should reflect close consultation with the County Council who are responsible for transport & highways in the rural area.

e.g. A69 has absolutely no provision for cyclists who have either to use the pavement which means crossing the A69 on several occasions or to use a road full of pot holes & adjacent to large fast lorries.

The plan contains no positive recommendations for sustainable cycle routes as transport.

The plan should reflect close consultation with the County council who are responsible for transport & highways in the rural area; recommendations should be made for sustainable cycle routes as transport.

- Response
1. Disagree - new development has to be sustainable. Some settlements are always going to be too small to support local services and/or too isolated to allow for the establishment of reliable public transport links. The amount of new development that would be required to ensure support for services and improved transport links are provided in these sorts of villages would be excessive and would change the character and role of the settlement forever. Applications for development in these villages will continue to be assessed on their own merit, it would not, however, be appropriate for the Local Plan to allocate land for housing within villages that could be considered unsustainable locations.
 2. Planning policy can only influence new development. It would be inappropriate for the Local Plan to attempt to alter previous planning approvals. Policy S4 does mention the need to improve green infrastructure connections between new and existing development however this can only be in response to proposals for new links or enhancements to existing ones as per the remit of the plan.
 3. The Council continues to work closely with Cumbria County Council as the Highway Authority for Cumbria. We also consult with the Highways Agency who are the authority for the trunked A69. It is not within the remit of the Local Plan to recommend or propose new cycle ways. We will continue to work with the relevant authorities to ensure proposed new cycle way routes are protected from development once they are known.

Proposed Change No change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1020	Comment	Policy	34	
194	Michael Barry	Cumbria County Council		
Detail	<p>Cumbria County Council is the Highways and Transport Authority for Cumbria. In light of this, the policy is important for the County Council when undertaking its responsibilities. To enhance this policy, a number of amendments are proposed.</p> <p>Suggested Changes:</p> <ul style="list-style-type: none"> - The word "normally" should be deleted from the second sentence of the policy. - The Policy should refer to new development needing to provide convenient access to public transport. - Under Cumbria Local Transport Plan reference to "Public Transport Interchange" should be removed - The Travel Plans and Transport Assessments criteria referred to as being in Appendix 2 have been superseded and need to be replaced with current guidance. The criteria are not contained within LTP3. Alternatively, the policy should simply make reference to the thresholds contained in National or Local Highway Authority guidance. The up to date criteria are contained within Annex A of the submission. - Delete paragraph 6.12 and revise paragraph 6.13 to remove reference to the LTP. Revised wording is proposed: "Proposals for development will be assessed in line with the thresholds in order to determine whether it is necessary for travel plans and transport assessments to be submitted." - Greater focus is required in the Policy on reducing the need to travel. 			
Response	<p>The word "normally" should be deleted from the second sentence of the policy. - Agreed The Policy should refer to new development needing to provide convenient access to public transport. - Agreed Under Cumbria Local Transport Plan reference to "Public Transport Interchange" should be removed - Disagree - this is put forward as a key project within the emerging City Centre Masterplan. Reference to it as part of the Local Transport Plan can be removed however. Travel plan/transport assessment thresholds - agreed Delete paragraph 6.12 - Agreed, although the City Council would appreciate an indication as to when or if site specific plans and projects for the LTP are forthcoming. Changes to paragraph 6.13 - agreed. Reference reduced need to travel - agreed</p>			
Proposed Change	Changes to be made in line with response above.			
0106	Objection	Policy	34	
049	Mr D Nash			
Detail	again the Draft gives statements of good intent, but disappointingly there is no reference to Park & ride Schemes, many cities, notably and locally York & Durham. The final plan should in my view address this.			
Response	Noted. Park and Ride allocations have been dropped from this Plan. They were included in the 2008 Local Plan, however they received absolutely no interest and it was felt that there was no merit in continuing the policy.			
Proposed Change	No change.			

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

0955 Objection Policy **34**

005 Paul Barton Clerk to Dalston Parish Council

Detail The current provision for cyclists in Carlisle and its environs is totally inadequate with far too many disconnects. Provision for cyclist should be made in all new developments including allowing them to join the infrastructure if it exists.
Number 4 should included provision for disabled people trying to gain access to infrastructure using wheelchairs and motorised disability vehicles.

Response Noted and agreed. Cyclist provision within development is covered by Green Infrastructure policy S4, it is also referenced as a requirement within this policy. Accessibility provision for people with disability issues is covered by Policy 49 Access, Mobility and Inclusion.

Proposed Change No change.

1120 Comment Policy **34**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail There is a definite need for rural bus services to be looked at. Many of the communities surrounding Carlisle have limited or no local bus services.

Response Noted and agreed. However, Carlisle City Council is not responsible for bus services - policies can only go as far as ensuring that new development is accessible by public transport. Whilst this can sometimes mean that the developer will have to ensure provision is available it mostly means that new development is located on or close to existing public transport networks.

Proposed Change No change.

0770 Support Policy **34**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Support noted.

Proposed Change N/a

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

0023 Objection Policy **34** 138 - 141

011 Terry Jones

Detail
 The Plan is Prejudiced: It is prejudiced in favour of the interests of the motorist, car parking gets many mentions throughout the plan whilst footpaths and cycleways get few. The plan does not appear to have addressed the absurd situations that this prejudice has given rise to. For example, motorists are allowed to drive down Bank Street in the historic centre of the city at up to 30 mph but the riding of bicycles on this street is forbidden. There is clear reluctance by the City Council to give pedestrians any priority, for example at most traffic light crossings pedestrians are made to await the convenience of motorists. A number of Zebra crossings, for example on Wigton Road, where the pedestrian had priority have been replaced by traffic light controlled crossings that give priority to motorists. A number of what are clearly meant to be pedestrian crossings have recently been constructed by the City Council, for example, at the end of Abbey Street, but there is no indication as to whether the pedestrian or the motorist has priority at these informal crossings.

The Plan Is Incomplete: The plan has not addressed the need or otherwise of additional river and rail crossings. Three pedestrian river crossings have been lost in recent years, two over the river Eden, the Willowholme Viaduct crossing, the West Coast main line crossing and a crossing over Parham Beck. I would suggest that the crossing of the West Coast main line by Petteril Bank Road is inadequate.

Response
 Disagree. The plan is not prejudiced. Cycling and pedestrian provision are mentioned frequently, particularly within the Green Infrastructure policy (S4) and chapter, as well as specifically mentioned within Policy 34 - the main aim of which is to reduce the need to travel using the private motor vehicle and encourage the use of sustainable modes of transport wherever possible. Car Parking is a critical issue, particularly within the urban area. Reference to it in policy is proportionate.

The layout and design of roads and streets, including pedestrian crossings, falls within the remit of the County Council. This also applies to the provision and maintenance of pedestrian bridges and river crossings along footpaths and other rights of way.

Proposed Change
 No change - the representation raises issues beyond the remit of the Local Plan.

0309 Objection Policy **34** 6.15& 6.17

078 Mr Trevor Wilson

Detail
 I support having electric car charging points, but object to the policy as stated as the policy needs beefing up and thus have some comments. You state 'Whilst there is not currently the level of demand for charging points within Carlisle to justify making their inclusion within development a requirement the Council would still seek to encourage an increase in provision wherever possible.'
 I think the council should be doing more and there must be certain type of development where it would be mandatory to provide electric car charging points or put the onus on the developer to provide reason(s) not to include electric car charging points.

Change the policy to make it stronger in favour of the provision of electric car charging points.
 Reword 6.17 to state the developer should provides reasons for not include a car charging point.

Response
 Agreed. Whilst it is still not considered reasonable to require such provision, this suggested re-wording would ensure developers have to actively consider it within proposals.

Proposed Change
 Update text to require developers to give reasons for not including provision for electric vehicles in proposals.

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

0891	Objection	Policy 34	6.17	141
187	Ken Hind		Clerk to Kingmoor Parish Council	
Detail	The council is making no provisions for electronic charging points. They say it is in its infancy however the showrooms are all full. Even Hadrians Wall has charging points and it must be considered going forward. It is very short sighted we need a decision.			
Response	Disagree - the Council has no evidence to suggest electric vehicles are currently being used to a degree that would warrant making charger provision mandatory within new development.			
Proposed Change	No change.			

0369	Comment	Policy 35		
088	Elizabeth Allnutt		Save Our Streets	
Detail	The Policy applies to new development rather than existing provision. Where it impinges on the Conservation Area status, SOS would endorse this policy. Small businesses in Rickergate recognise the importance of the parking areas in Rickergate for the viability of business. Details for the long-term policy for parking areas such as these are not available. Further comment on parking will rely on knowledge of what is proposed in the City Centre Master Plan.			
Response	Noted. The City Centre Master Plan is currently being consulted on. It will inform the Local Plan and a second round of preferred options consultation will be held in Spring 2014.			
Proposed Change	No change.			

0956	Objection	Policy 35		
005	Paul Barton		Clerk to Dalston Parish Council	
Detail	If this applies to commercial parking, then there should be a parking bay per employee. If domestic, then there should be one space per adult. All too vague. Should have had numbers.			
Response	Noted. The policy establishes the principle for parking standards to follow. A Supplementary Planning Document (SPD) with detailed numbers and standards will be worked up in consultation with Cumbria County Council.			
Proposed Change	No change.			

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

0771 Comment Policy **35**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail The local plan should point the way to a joint car parking policy prepared by the City Council and the County Council as the highway authority for the city centre as a matter of urgency, other than that we support the policy.

Response Noted. The County Council has offered assistance in helping Carlisle City Council prepare a car park strategy. This will most likely take the form of a SPD.

Proposed Change No change.

1021 Comment Policy **35**

194 Michael Barry Cumbria County Council

Detail The current parking standards are contained in the document "Parking Guidelines in Cumbria" produced in September 1997 which was adopted as Supplementary Planning Guidance by the Local Planning Authorities within Cumbria. This guidance was based upon National Planning Policy Guidance at that time which set maximum parking standards.

It is accepted that the existing parking guidelines need to be reviewed; however, this should be done in consultation with the Highway Authority and the other Local Planning Authorities within Cumbria. While setting a minimum parking standard may be considered appropriate for residential developments (as it has been shown that maximum standards do not affect car ownership levels), maximum standards are still considered appropriate for other uses, particularly where other sustainable travel options are available, such as car share, public transport, walking and cycling etc. It is therefore inappropriate to stipulate all parking standards will set a minimum threshold at this stage.

Suggested Changes:

It is considered that the proposed policy should be amended in order to allow appropriate parking standards to be developed.

Response The Local Plan seeks to ensure that parking provision within new development is adequate. Consultation with our own car parks team has suggest that there are issues within the City Centre with inadequate levels of parking. They have also highlighted issues with parking on the Kingmoor and Kingstown industrial estates, where businesses have not provided enough car parking and the estate roads have become clogged with on street, haphazard parking. Many residents in and around Botchergate have also expressed concern that the potential loss of William St car park may cause severe issues with parking on Botchergate. It is within this context that the Council would wish to retain the notion of minimum standards for all development types, with an emphasis on where this is appropriate, as we move, in consultation with Cumbria Highways, towards producing our own parking standards SPD.

Proposed Change No change.

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

0957 Objection Policy **36**

005 Paul Barton Clerk to Dalston Parish Council

Detail There is little evidence that this policy has been applied. Every new development should have proper connectivity. This policy is too vague. 2nd paragraph - replace 'wherever possible' with 'Any'. Also, replace 'should' with 'must'.

Response This policy will not have been applied, as it is a new policy within a draft Local Plan that currently carries no weight within planning decisions. It is agreed that every new development should have proper connectivity, hence this policy has been written into the plan. Suggested changes are acceptable.

Proposed Change Make suggested changes.

1022 Comment Policy **36**

194 Michael Barry Cumbria County Council

Detail 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.

Response Support acknowledged

Proposed Change No change

0261 Support Policy **36**

073 Mrs Sarah Kyle Clerk to Hethergill Parish Council

Detail Hethersgill Parish Council support this policy as the provision of high speed broadband in rural areas is vital for their sustainability and should be prioritised.

Response Acknowledged

Proposed Change No change

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

0772 Comment Policy **36**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail We support the local plan policy but suggest it should point the way to having the city centre networked to create a fairer and more economically sustainable city centre with free city centre Wi-Fi to all, regardless of network provider.

Response Noted. A project known as Digital Carlisle is attempting to establish a free, public Wi-Fi network within the city centre. Whilst the Plan can not implement or direct this project, it can support it and ensure that planning does not impede it.

Proposed Change Mention Digital Carlisle in policy, ensure city centre Wi-Fi network is supported.

0975 Comment Policy **36**

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail Broadband Access: There is a responsibility for developers to provide high speed broadband for consumers and there appears to be no obligation for broadband providers to consult with parish councils when installing new fibre optic cables etc or to provide spurs when installing cables. E.g. A69, BT fibre optic cable has been installed with no provision for the adjacent village of Warwick on Eden to link up.

Response Noted. Wording referencing Parish Councils and a more integrated approach to broadband can be included.

Proposed Change Include requirement for major development to consult with Parish Councils and encourage a more integrated approach to rural broadband.

0313 Support Policy **36**

078 Mr Trevor Wilson

Detail Policy supported.

Response Support Acknowledged

Proposed Change No change

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

0856 Objection Policy **37**

173 Cllr Bloxham

Detail I believe if this policy is adopted it will conflict with the Councils policy of a kerbside collection. So would be a change of policy.

Response Noted. Collective waste storage points would not be a requirement for new development, but the Council should still support a developer who wishes to include them within proposals and policy should ensure that they are sustainably located and designed. Sites should be located within easy walking distance of any given front door on an estate. Special arrangements should be worked out to help those with mobility issues. This can be clarified within the policy. On sites where collective wastes points are not to be included, the policy can be re-written to ensure that achieving kerb-side collection of waste is of high importance within design and access statements.

Proposed Change Update and clarify as per response.

0615 Comment Policy **37**

128 Cllr John Mallinson Carlisle City Conservative Group

Detail The number of dwellings that each single point of collection of refuse can serve should be limited. If the number of dwellings using one of these points is too large there is potential risks to be created in terms of health and hygiene and fire safety

Response Agreed. This will be added to the policy. Waste Services have confirmed that they have standards for how many properties can be served by one euro-bin - (8 where recycling facilities are provided and 12 where no recycling bins are present)

Proposed Change Add a maximum number of dwellings to be served by any given euro-bin.

1023 Comment Policy **37**

194 Michael Barry Cumbria County Council

Detail The Development Principles of the Cumbria Sub-Regional Spatial Strategy set out that development should adopt the principles of energy efficiency and waste minimisation and management. While the principle of the policy is supported, the requirement for submission of site waste management plans for construction purposes should also be set-out within this policy or supporting text. Information about this is available through the following web site <https://www.gov.uk/site-wasteconstruction-plans>.

Suggested Changes:

Policy 37 or supporting text should make reference to the potential role of waste management plans.

Response Agreed. The requirement for a site waste management plan will be included in the text.

Proposed Change Add requirement for SWMP to justification.

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

0310 Comment Policy **37** 6.36

078 Mr Trevor Wilson

Detail Carlisle City Council currently aims to have at least 50% of all household waste disposed of sustainably either through recycling or composting. 50% is not good enough. Should be much higher – how about 80%?

Response The Local Plan does not set the recycling target for the district. This would be Council policy, this matter should be discussed with your local Councillor.

Proposed Change No change.

0215 Objection Policy **38**

072 Miss Alice Unsworth NFU

Detail The NFU would not wish to see rural and remote communities disadvantaged with extra restrictions and costs so as to become uneconomical.

Response Noted. However, where infrastructure constraints exist extra costs may be unavoidable to ensure improved provision is made available, particularly if the infrastructure required is vital to the functioning of proposed new development. This would apply as much in urban areas as it would in rural and remote communities.

Proposed Change No change

0314 Support Policy **38**

078 Mr Trevor Wilson

Detail Policy supported.

Response Support Acknowledged

Proposed Change No change

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

0315 Support Policy **38**

078 Mr Trevor Wilson

Detail Policy supported.

Response Support Acknowledged

Proposed Change No change.

0958 Objection Policy **38**

005 Paul Barton Clerk to Dalston Parish Council

Detail Drainage of surface water into the sewers should not be permitted.

Response Noted. The policy clearly states that development which would involve surface water draining into the foul water sewerage network will not be permitted.

Proposed Change No change.

0216 Comment Policy **38**

072 Miss Alice Unsworth NFU

Detail The NFU would welcome consideration to be given to the rural community and farm land when it comes to looking at the impact of drainage systems across the wider catchment.

Response Acknowledged. This is done as a matter of course through the planning process.

Proposed Change No change.

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

0083 Comment Policy **38**

034 Lucy Adamski Aoo8

Detail The part of the policy geared towards sites with no connection to the public sewerage system is welcomed as this is a common consideration with some rural sites that can otherwise be developed. However, it is considered that "may" should be revised to "will" be permitted to give certainty in cases where any given system is designed and maintained to the satisfaction of the Environment Agency.

Response Agreed. Policy wording will be changed.
Proposed Change Policy wording to be changed accordingly.

1024 Objection Policy **38**

194 Michael Barry Cumbria County Council

Detail Within this policy, there is no mention of the implications of SuDS provisions in the Flood and Water Management Act 2010. These are expected to be commenced in April 2014. The Act proposes to give the responsibility for SuDS approval and maintenance to Lead Local Flood Authority (LLFA) which in Cumbria will be the County Council. All new drainage will be required to meet certain national standards before the LLFA adopts the system. In exercising these duties, LLFAs will be known as the SuDS Approving Body or the SAB. No development will be allowed to proceed without approval of the surface water drainage system from the SAB. Furthermore, connection of the surface water drainage from a development to a watercourse or an adopted sewer will not be allowed until SAB approval is granted. It is expected that the SAB approval process will have the same status as Building Regulations approval. As of August 2013, the relevant parts of the Act have not yet been implemented but a commencement date of April 2014 has been indicated. The Government has consulted on the national standards and the secondary legislation that is required for Approving Bodies to exercise their duties. Until these are published it is not possible to anticipate what is expected or how Cumbria County Council as LLFA and SAB will deliver this role.

Suggested Changes:

- Some of the detail highlighted above, should be added to the 'Justification' section.
- 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".

Response This comment is more suited to policy 45 on Sustainable Drainage Systems. Wording from this has been incorporated into the policy and justification text for Policy 45. Policy 38 is focused on foul water drainage infrastructure.

Proposed Change Policy 45 has been amended accordingly. Policy 38 title amended to state "foul water drainage on development sites"

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

0408 Objection Policy **38** 149

095 Jenny Hope United Utilities

Detail
 We are seeking the following amendments to the Council's text :
 Development should not be permitted where inadequate foul water treatment and surface water drainage infrastructure exists, or where such provision cannot be made within the time constraints of planning permission unless the developer can demonstrate acceptable alternative private solutions. Development which would involve surface water draining into the foul water sewerage network will not be permitted.
 Within the justification text, we would seek an amendment to Paragraph 6.43:
 United Utilities manage and monitor capacity within the waste water treatment network. The Council relies on feedback from them in order to ascertain whether sufficient capacity exists within the network to accommodate new development or where it may be necessary to co-ordinate development in line with any upgrading work. This will be dependent on detailed proposals; developers are encouraged to speak to United Utilities at the earliest opportunity.
 At present, the Council has been made aware the Wetheral and Great Corby waste water treatment works is nearing capacity, discussions surrounding solutions to resolve this are ongoing between the Council and United Utilities. Any development proposals that are confirmed as impacting on this treatment works may require a co-ordinated approach with any upgrading works.

Response Agreed. Text will be amended.

Proposed Change Amend text as suggested

0203 Objection Policy **39**

070 Mr R Coad A013

Detail
 This policy is covered within the General Permitted Development Order (GPDO) and it is not therefore considered necessary to have this policy included within the Local Plan. We therefore recommend removal of Policy 39.

Response Agreed. Policy will be removed. Issues around over-cluttering of buildings can be covered in the Design policy S3.

Proposed Change Policy to be deleted. Ensure Policy S3 contains reference to over cluttering of buildings.

0163 Objection Policy **39**

062 Church Commissioners for England A013

Detail
 This policy is covered within the General Permitted Development Order (GPDO) and it is not therefore considered necessary to have this policy included within the Local Plan. We therefore recommend removal of Policy 39.

Response Agreed. Policy will be deleted, with some text included in Policy S3 to guard against issues of over-cluttering on buildings.

Proposed Change Delete policy 39. Add text to address anti-cluttering issues in Policy S3.

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

0746 Comment Policy **39**

154/26/27 Mr Bryan Craig

Detail Is Item 4 going to be workable as the dishes have usually to be mounted pointing in the direction of the signal

Response This policy is to be deleted. Mostly covered by permitted development.

Proposed Change N/a - Delete policy

0616 Objection Policy **39**

151

128 Cllr John Mallinson Carlisle City Conservative Group

Detail Point 4: This should be amended to allow dwellings in conservations areas to be assessed on an individual basis.

Response Policy to be deleted

Proposed Change Policy to be deleted

0959 Objection Policy **40**

005 Paul Barton Clerk to Dalston Parish Council

Detail This should include broadband!!!

Response Agreed.

Proposed Change Include broadband in the text.

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

1025 Objection Policy 40

194 Michael Barry Cumbria County Council

Detail Background information submitted. Revised Wording:
 Carlisle City Council will work with partners to deliver infrastructure, services and community facilities to improve the sustainability of its communities. In accordance with the provisions set out within national policy, the City Council will require new developments to secure infrastructure improvements which are necessary to make the development acceptable by planning condition or obligations. Planning obligations may also be required 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. The infrastructure, facilities and services to which development may be required to contribute include (this list is not exhaustive): [list given covering Physical, Social and Green Infrastructure]

Response Agreed.
 Proposed Amend wording as suggested.
 Change

0976 Objection Policy 40

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail the CIL is not promoted or comments invited in this consultation, as the CIL is to be implemented nationally in 2014, will this involve further consultation and possible amendments to the new Local Plan. [Quotes given from the overview issued by CLG]. An example is Cummersdale Parish, there have been 3 major developments and there has been no dialogue with the community. There is also a requirement for local authorities to allocate meaningful proportions of levies raised back to the neighbourhood and to work closely with neighbourhoods to decide what infrastructure is required, with a limit if 5% admin fees. Where is this in the local plan? Evidence to include the CIL in the local plan and how it will be implemented in the Carlisle District.

Response Reference to the CIL may be included. However, as the Council is yet to decide as to whether a CIL will be adopted for the district it would be inappropriate to go into detail or speculate as to how a CIL in Carlisle would function. These details would be provided in the form of an SPD or other planning document once known.
 Proposed Add reference to CIL.
 Change

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

0119 Comment Policy **40**

051 Story Homes Ltd A010

Detail The lack of viability assessment for review makes comment difficult. However Story Homes would seek to ensure that all relevant information is transparently assessed and would welcome an opportunity to play an active role in any discussions.

Response Noted. A viability assessment is underway. It will be consulted on alongside the revised preferred options in the Spring of 2014.

Early engagement and pre-application discussions are also welcomed by the Council and underpin the principles of Development Management.

Proposed Change No change

0120 Objection Policy **40**

051 Story Homes Ltd A010

Detail There is no evidence that this policy is appropriate in Carlisle District. Building Regs are considered to be the appropriate vehicle to attain required energy conservation values. Increasing demands ahead of Building Regs coded have significant impacts on development viability and while developers may choose to bring sites forward which exceed Building Regs this should be left to individuals and not a policy within the local plan.

Response Comments are noted. It is considered that due to the progressive tightening of national standards through Building Regulations, the requirement for development to seek to improve CO2 emissions savings above the Building Regulations baseline should be removed from this Policy. The Development, Energy Conservation and Efficiency Policy will remain in order to encourage development to build to high standards of efficiency and thus reduce our carbon footprint. There was also concern that this requirement may be difficult to enforce.

Proposed Change This Policy has been amended to remove reference to the requirement for development to build to a higher standard than current building regulations.

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

0164 Comment Policy 40

062 Church Commissioners for England A013

Detail We support the assertion set out in paragraph 1.29 of the Local Plan which sets 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 sites.

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 their individual merits to ensure development can and will take place.

While 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.

These comments also relate to the following policies:

- Policy 24 'Affordable Housing';
- Policy 33 'Delivering Infrastructure';
- Policy 34 'Sustainable Transport';
- Policy 36 'Broadband Access';
- Policy 43 'Development Energy Conservation and Efficiency'; and,
- Policy 65 'Open Space'

In line with these documents, the above policies, particularly Policy 40, must affirm that the Council will ensure that addition of developer contributions and / or CIL will not put the overall development across the District at risk due to viability.

Response Noted. Reference can be made to this. Reference will also be made to the emerging economic impact/viability study that the Council is commissioning, emphasising the need to deliver required infrastructure whilst also ensuring the economic viability of development.

Proposed Change Include reference to emerging viability impact study. Emphasise the need to strike a balance between infrastructure requirements and economic viability of development within policy justification.

0379 Objection Policy 40

089 Elizabeth Allnutt National Allotments Society

Detail Planning Obligations. Allotment provision should also figure in the list of issues around planning obligations
Suggest: Include allotment provision in the planning obligations listed in Policy 40

Response Agreed.

Proposed Change Add allotments to the list.

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

0332 Comment Policy **40**

081 HS Cartmell A013

Detail

We support the assertion set out in paragraph 1.29 of the Local Plan which sets 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 sites.

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 their individual merits to ensure development can and will take place.

While 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.

In line with these documents, Policy 40 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.

These comments / concerns also relate to the following policies:

- Policy 24 'Affordable Housing';
- Policy 33 'Delivering Infrastructure';
- Policy 34 'Sustainable Transport';
- Policy 36 'Broadband Access';
- Policy 43 'Development Energy Conservation and Efficiency'; and,
- Policy 65 'Open Space'

Response Noted. Reference can be made to this. Reference will also be made to the emerging economic impact/viability study that the Council is commissioning, emphasising the need to deliver required infrastructure whilst also ensuring the economic viability of development.

Proposed Change Include reference to emerging viability impact study. Emphasise the need to strike a balance between infrastructure requirements and economic viability of development within policy justification.

0719 Comment Policy **40**

151/23 Mr Bob Sharples Sport England

Detail Sport England believes it would be better to explicitly identify sport along with the other items such recreational space and community facilities.

Response Agreed.

Proposed Change Identify Sport within the text.

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

0558 Objection Policy 40

120 Possfund Custodian Trustees Limit A019

Detail The proposed planning obligations policy implies that contributions may be sought from developers towards a wide range of issues and infrastructure deficits identified in the Carlisle Infrastructure Plan.

The Community Infrastructure Levy (CIL) 2010 Regulations, which came into force on 6 April 2010, set out that the use of Section 106 Agreements for 'pooled' infrastructure contributions will no longer be permitted after 6 April 2014, or once the Council has adopted a CIL. This will narrow the scope and type of infrastructure contributions that can be sought by Councils through Section 106 Agreements to more site-specific mitigation measures. It is intended that CIL will be used for more general infrastructure contributions.

We recommend this is reflected in the policy given that the Local Plan will be in place long after April 2014. The policy should also refer to the tests set out in national policy and guidance which ensures that planning obligations are acceptable. Paragraph 204, the NPPF sets out those tests.

Response Agreed.

Proposed Change Text to be added to policy outlining that no more than 5 contributions may be pooled on any one particular project. The importance that they must not make developed unviable to be emphasised.

1131 Objection Policy 40

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail Re CIL - Extracts quoted from CLG 'an Overview@; CIL guidance document and consultation document to support comment. Cummersdale Parish Council are disappointed that the consultation does not include at least an explanation of the CIL scheme and invite comments. It involves the communities in the development of major schemes and with funding for infrastructure, including social infrastructure projects in their parish. We ask that the working group of officers and district councillors address this in their further deliberations and incorporate their considered views in the follow up consultation.

Response Reference to the CIL may be included. However, as the Council is yet to decide as to whether a CIL will be adopted for the district it would be inappropriate to go into detail or speculate as to how a CIL in Carlisle would function. These details would be provided in the form of an SPD or other planning document once known.

Proposed Change Add reference to CIL.

0458 Support Policy 40

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District support Policy 40 – Planning Obligations on the basis that this is the best way to ensure that environmental enhancements associated with development (such as green infrastructure, habitat management, landscaping) promised by developers are delivered.

Response Support noted.

Proposed Change N/A

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0204	Comment	Policy	40	
070	Mr R Coad			A013
Detail	<p>We support the assertion set out in paragraph 1.29 of the Local Plan which sets 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 sites.</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 their individual merits to ensure development can and will take place.</p> <p>While 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>These comments also relate to the following policies:</p> <ul style="list-style-type: none"> • Policy 24 'Affordable Housing'; • Policy 33 'Delivering Infrastructure'; • Policy 34 'Sustainable Transport'; • Policy 36 'Broadband Access'; • Policy 43 'Development Energy Conservation and Efficiency'; and, • Policy 65 'Open Space' <p>In line with these documents, the above policies, particularly Policy 40, must affirm that the Council will ensure that addition of developer contributions and /or CIL will not put the overall development across the District at risk due to viability.</p>			
Response	Noted. Reference can be made to this. Reference will also be made to the emerging economic impact/viability study that the Council is commissioning, emphasising the need to deliver required infrastructure whilst also ensuring the economic viability of development.			
Proposed Change	Include reference to emerging viability impact study. Emphasise the need to strike a balance between infrastructure requirements and economic viability of development within policy justification.			
0510	Objection	Policy	40	153
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>			
Response	Agreed.			
Proposed Change	Include reference to historic environment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0046	Comment	Policy	New	
024		Mobile Operators Association		
Detail	<p>Suggest inclusion of a clear and flexible telecommunications policy be introduced in one of the main LDDs. [Background and further information given]. It should be introduced by a short paragraph outlining the development pressures and the authority's policy aims i.e.: "Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document....."</p> <p>Suggested Policy Text:</p> <p>"Proposals for telecommunications development will be permitted provided that the following criteria are met: -</p> <ul style="list-style-type: none"> (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</p>			
Response	<p>Noted. A policy for telecommunications was included in the previous Local Plan. Carrying this policy over to the new Plan was considered, but was felt to be unnecessary in light of the comprehensive coverage given to this issue in the NPPF. The suggested wording here does not address any new issues beyond what the NPPF already considers.</p>			
Proposed Change	<p>No change. NPPF policy is adequate to assess telecommunication applications. There is no need to duplicate national policy in the Local Plan.</p>			

RepNo	Status	Paragraph	Page	Map
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Consultee Ref No	Consultees.Contact	Organisation	Agent
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REPRESENTATIONS

RepNo	Status	Paragraph	Page	Map
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Consultee Ref No	Consultees.Contact	Organisation	Agent
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Chapter 07

0459	Objection	Policy	2.35	24
102	Dr Kate Willshaw		Friends of the Lake District	
Detail	Climate change is not just about flood risk. The objective in the box at the start of the chapter needs to be changed to recognise this and at least include the impacts listed in Paragraph 2.35 on page 24.			
	Suggest: The objective should reflect the fact that Carlisle needs to become more resilient to be able to successfully adapt to climate change. This will involve looking at many issues from flooding and food supply networks to drought and higher costs for energy and goods.			
Response	Comments are noted and agree. The Chapter Objective will be amended accordingly.			
Proposed Change	The Chapter Objective has been amended and now states "Objective: To reduce emissions of greenhouse gases and avoid inappropriate development in areas at greatest risk of flooding in order to ensure that the District is more resilient and less vulnerable to the effects of climate change and can successfully adapt to its effects".			

0266	Comment	Policy	41
074	Tim Coombe		Sustainable Brampton
Detail	Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.		
	Community led renewable energy generation schemes are a highly attractive way of meeting wider sustainability targets whilst also promoting economic growth and providing social benefits. Brampton and Beyond Energy (BABE) is a good example of one such project which seeks to benefit from seed-corn investment by the Rural Community Energy Fund (RCEF) sponsored by the DECC and administered through the Waste and Resources Action Programme (WRAP). Investment advice will be provided through Rural Cumbria Connects (RCC), a group of independent advisors who are committed to resourcing and administering multiple community based renewable energy projects. [further comments made regarding aims and how further achievement could be attained]		
Response	Comments are noted. It is recognised that the Plan as a whole needs to be conscious of the potential effects of climate change in the future. The justification of this Policy could be amended to better reflect the potential and importance of community led renewable energy schemes in enabling communities to provide their own power source, thus improving their resilience. Paragraph 7.5 touches on this but this could be expanded to say that policies would give positive weight to renewable and low carbon energy initiatives which have clear evidence of local community involvement and leadership.		
Proposed Change	This Policy has been amended to state that "It will also positively support community-led initiatives for renewable and low carbon energy where they are in line with this policy, for example community led anaerobic digestion schemes".		

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

0290 Objection Policy **41**

077 Mr Alan Hubbard National Trust

Detail Generally the approach proposed is supported. However, there is arguably some potential for ambiguity over the general requirement that "there would be no unacceptable levels of harm to features designated as of local, national or international importance". In particular this is less than clear about the matter of impacts upon the settings of designated assets. In contrast there is no ambiguity, for example, in the NPPF about the importance and contribution of the settings of heritage assets (e.g. para 128).

Amend the proposed Policy to read:

"6. there would be no unacceptable levels of harm to features designated as of local, national or international importance or their settings".

Response Comments are noted and the Policy will be amended accordingly.

Proposed Change The Policy has been amended as a result of this comment and now reads as follows '6. there would be no unacceptable levels of harm to features designated as of local, national or international importance, or their settings'.

0960 Objection Policy **41**

005 Paul Barton Clerk to Dalston Parish Council

Detail Government policy does not reflect common sense - e.g. Biodiversity

Response Comment noted.

Proposed Change No proposed change in response to this comment.

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

0460 Comment Policy **41**

102 Dr Kate Willshaw Friends of the Lake District

Detail [Includes Rep 0461 Policy 42] Friends of the Lake District would like to see additional criteria in these policies to ensure that large-scale renewable scheme developers undertake adequate community engagement at pre-application stage, and that the views of the community are taken into account by developers. Paragraph 7.22 Friends of the Lake District support the proposal to consult the RSPB where a development has the potential to impact on bird populations. We would request that we are consulted where a renewables development has the potential to impact on high value landscapes.

Response Comments are noted. The Policy Justification will be expanded to ensure that Cumbria Wildlife will be consulted where a renewable energy scheme has the potential to impact on high value landscapes.

In relation to the suggestion that large-scale renewable scheme developers should undertake adequate pre-application community engagement, new measures, due to be laid before Parliament shortly, will require developers seeking planning permission for virtually all onshore wind developments to consult the local community before submitting a formal planning application.

It is clear that this new requirement for pre-application consultation would cover all projects involving more than two turbines and any proposal for a turbine more than 15 metres high. When a proposal meets the criteria, the developer will need to consult to ensure communities' views about siting and other relevant planning issues can be heard first. This will come into force before the end of the year. Details of the new regime will be set out in the Town and Country Planning (Development Management Procedure and Section 62A Applications (England) (Amendment) Order 2013.

Whilst it is recognised that this requirement only applies for proposals for wind energy developments, it is good practice for applications for any type of renewable energy schemes to involve the public at an early stage. The Policy justification encourages developers to do this within para 7.5.

Proposed Change The Policy Justification has been amended to say "7.8 Additionally, the RSPB will be consulted where development has the potential to impact significant populations of sensitive birds species or their habitats, and Friends of the Lake District will be consulted where renewable energy development has the potential to impact on high value landscapes".

In relation to pre-application consultation, the Policy states "The Council is in support of the principle of renewable energy provided it meets the criteria set out in the policy. It will seek to foster community involvement in larger scale renewable energy projects, and recommends that developers of renewable energy projects engage in active consultation and discussion with local communities at an early stage in the planning process".

0564 Objection Policy **41**

121 Mike Fox Brampton Economic Partnership

Detail 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. [Comment supported by Burtholme Parish Council]

Response Comments are noted and the Plan has been updated accordingly. It is however worthwhile noting that in some cases applications for anaerobic digester plants would come under the remit of Cumbria County Council as Waste Planning Authority and will be assessed using the Minerals and Waste Local Plan. This is primarily where the renewable energy development will import off-site waste materials.

Proposed Change Paragraph 7.5 of the policy justification has been updated to say that the Policy will "also positively support community-led initiatives for renewable and low carbon energy where they are in line with this policy, for example community led anaerobic digestion schemes".

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

0774 Support Policy **41**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail We support this but feel the need for a definition of what is classed as "unacceptable visual impact".

Response Definition of what is considered 'unacceptable visual impact' would be difficult to define as the acceptability of a scheme would vary in each different landscape. The City Council along with other authorities in Cumbria are working on a Joint Cumulative Impact of Vertical Structures Study which will look into this further and provide guidance on what is considered unacceptable/over saturation. This evidence base, when completed, will help towards assessing when an application is considered to have an 'unacceptable visual impact'.

Proposed Change No proposed change as a result of this comment.

0845 Comment Policy **41**

170/45 Mr Nick Sandford The Woodland Trust

Detail We would like to see woodfuel specifically referred to in the policy as a source of renewable energy. It is important that the timber used comes from sustainably managed sources and it is best if it can be sourced locally rather than transported over long distances, to avoid negating some or all of the carbon benefits. As stated in the previous section.

Response Comments are noted and agree. The various technologies available to provide electricity will be mentioned within the Policy, including woodfuel.

Proposed Change Paragraph 7.2 of this Policy now states that renewable energy includes 'energy from wind, biomass, waste, hydropower, solar, heat pumps, woodfuel and others as technologies develop'.

0887 Comment Policy **41**

186 Ken Hind Clerk to Kirkandrews on Esk Parish

Detail Generation of electricity by water power; Tidal; Reuse of old water driven mills sites & new sites on water courses. Solar Farms

Response Comments are noted. A list of potential sources of renewable energy generation are provided within the Policy which states 'energy from wind, biomass, waste, hydropower, solar, heat pumps, woodfuel and others as technologies develop'.

Proposed Change There are no proposed changes as a result of this comment.

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

1026 Comment Policy **41**

194 Michael Barry Cumbria County Council

Detail
This policy highlights a range of considerations that regard should be given to during the consideration of renewable energy schemes. 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.

It should be noted that applications for certain types of renewable energy development which import off-site waste materials (e.g. Certain combustible, industrial, agricultural or domestic waste materials and anaerobic digestion plants), would come under the remit of the County Council as the Waste Planning Authority

Response
Comments are noted and agree. The links to the County Council in terms of the Waste Planning Authority will be improved within the Policy.

Proposed Change
The Policy has been amended as a result of this comment to state 'Certain combustible industrial, agricultural or domestic waste materials and anaerobic digestion plants are also regarded as renewable sources of energy however applications for this type of renewable energy development which import off-site waste materials would come under the remit of Cumbria County Council as the Waste Planning Authority'.

0977 Comment Policy **41**

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail
Throughout the policy the use of the word 'unacceptable' is used, this is not definitive. The policy should be definitive. Many subjective words - using 'visually attractive, satisfactory' appear throughout the plan. The language should be definitive with the terms used in the Glossary.

Response
Definition of what is considered 'unacceptable visual impact' would be difficult to define as the acceptability of a scheme would vary in each different landscape. The City Council along with other authorities in Cumbria are working on a Joint Cumulative Impact of Vertical Structures Study which will look into this further and provide guidance on what is considered unacceptable/over saturation. This evidence base, when completed, will help towards assessing when an application is considered to have an 'unacceptable visual impact'.

The use of other subjective words within the Plan is important as to define what is 'visually attractive' or 'satisfactory' in one landscape/setting may not be 'visually attractive' or 'satisfactory' in another.

Proposed Change
No proposed change as a result of this comment.

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

0511 Objection Policy **41** 156

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 delivering a number of other planning objectives. The renewable energy policy fails to make reference to the historic environment in the five criteria listed. We would welcome the requirement for renewable energy proposals to minimise any adverse impact on the historic environment.
 Suggest: Insert an additional criteria "there is no adverse impact on the historic environment"

para 7.4: The text refers to important landscapes and then goes on list types of heritage assets in the District (although it omits any reference to a WHS, which should be included). The paragraph should be amended to provide clarity on the important landscapes and historic assets separately.
 Suggest: Amend the text to detail the important landscapes. Also, insert reference to the WHS, which appears to be omitted from the justification. It is expected that any proposals for renewable energy schemes affecting the WHS should be in accordance with the Management Plan.

Response
 Comments are noted. Reference to the historic environment has been added to Policy criteria 1.

Proposed Change
 Policy criteria 1 has been amended to include reference to the historic environment and that proposals for renewable energy will be favourably considered provided that all of the following criteria are satisfied '1. there is no unacceptable visual impact on the immediate and wider landscape, and townscape or historic environment'.

Paragraph 7.4 of the Policy justification has been amended to make reference to the Hadrian's Wall World Heritage Site Management Plan 'and any proposals for renewable energy schemes that may affect Hadrian's Wall World Heritage Site should be in accordance with the Management Plan'.

0747 Comment Policy **42**

154/26/27 Mr Bryan Craig

Detail
 Would it be possible to include an Item 8 to cover the likely effects on the Health and Wellbeing of nearby residents.

Response
 It is considered that criterion 2 of the Policy covers health as it looks at the effects of turbine development on the amenity of the local area relating to shadow flicker, noise, vibration and air quality. It is considered that effects on the wellbeing of neighbouring residents is also adequately covered by the other Policy criteria.

Proposed Change
 There is no proposed change to the Policy in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1027	Comment	Policy	42	
194	Michael Barry	Cumbria County Council		
Detail	<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. 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.) development within the county. This study may assist the future consideration of such proposals.</p>			
Response Proposed Change	<p>Comments are noted and agree. Further information will be added to the policy justification to reference the Cumulative Impact of Vertical Structures Study.</p> <p>Further information has been added to the policy justification to reference the Cumulative Impact of Vertical Structures Study, "In relation to this, the City Council is currently working with Cumbria County Council and a number of other Cumbrian authorities on the development of a Cumulative Impact of Vertical Structures Study. This study will look at the cumulative effect of a number of tall structures in the landscape (turbines, pylons, telecoms, masts etc) and will be used to assess instances where it is considered that the landscape has reached the point of saturation. This study will be used when determining applications of this type when completed (expected end 2013)".</p>			

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

0461 Comment Policy **42**

102 Dr Kate Willshaw Friends of the Lake District

Detail [Includes Rep 0460 Policy 41] Friends of the Lake District would like to see additional criteria in these policies to ensure that large-scale renewable scheme developers undertake adequate community engagement at pre-application stage, and that the views of the community are taken into account by developers. Paragraph 7.22 Friends of the Lake District support the proposal to consult the RSPB where a development has the potential to impact on bird populations. We would request that we are consulted where a renewables development has the potential to impact on high value landscapes.

Response Comments are noted. The Policy Justification will be expanded to ensure that Cumbria Wildlife will be consulted where a renewable energy scheme has the potential to impact on high value landscapes. In relation to the suggestion that large-scale renewable scheme developers should undertake adequate pre-application community engagement, new measures, due to be laid before Parliament shortly, will require developers seeking planning permission for virtually all onshore wind developments to consult the local community before submitting a formal planning application. It is clear that this new requirement for pre-application consultation would cover all projects involving more than two turbines and any proposal for a turbine more than 15 metres high. When a proposal meets the criteria, the developer will need to consult to ensure communities' views about siting and other relevant planning issues can be heard first. This will come into force before the end of the year. Details of the new regime will be set out in the Town and Country Planning (Development Management Procedure and Section 62A Applications (England) (Amendment) Order 2013. The Policy justification has been amended to encourage developers to engage in active communication and discussion with the local community at an early stage in the process.

Proposed Change The Policy Justification has been amended to say "7.22 The RSPB will be consulted where development has the potential to impact significant populations of sensitive birds species or their habitats, and Friends of the Lake District will be consulted where renewable energy development has the potential to impact on high value landscapes". In relation to pre-application consultation, the Policy Justification now states "The Council will seek to foster community involvement in wind energy projects, and recommends that developers of renewable energy projects engage in active consultation and discussion with local communities at an early stage in the planning process. The Council will also seek to consider, where appropriate, the opportunity for developing community-led initiatives for wind energy schemes where they are in line with this policy.

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

0593 Comment Policy **42**

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail Renewable Energy (wind turbines)
 Carlisle and Allerdale have very different opportunities for deploying renewable energy in the form of wind turbines. Carlisle, in particular, has constraints from RAF Spadeadam and the Eskdalemuir seismic testing station which prevent most wind turbine development. In contrast Allerdale hosts 70% of the county's deployed renewable energy resource. Renewable energy has been addressed at a strategic level to ensure a joint evidence base (Cumbria Renewable Energy Capacity and Deployment Study 2011) and from a policy perspective with the Cumbria Wind Energy SPD.

Response Comments are noted and it is agreed that the situations between Allerdale and Carlisle are very different. The cumulative effect of turbines across the District boundary is something that both authorities are mindful of, especially in the area to the west of Carlisle City. The joint Cumulative Impact of Vertical Structures Study that is currently being produced on behalf of the County Council and other Cumbrian authorities may go some way towards helping to assess any future issues of cumulative impact.

Proposed Change There is no proposed change in response to this comment.

0617 Objection Policy **42**

128 Cllr John Mallinson Carlisle City Conservative Group

Detail This policy should also include a criteria relating to the density of development at a particular site and the potential for impact on the health and wellbeing of neighbouring residents.

Response It is considered that the health and wellbeing of neighbouring residents is adequately covered by the Policy criteria as it is laid out. The density of development would be considered under criterion 1 of the Policy as it covers the location, scale and visual impact of the development in relation to the character and sensitivity of the immediate and wider surrounding landscape and townscape, and it is considered that criterion 2 of the Policy covers health and wellbeing as it looks at the effects of turbine development on the amenity of the local area relating to shadow flicker, noise, vibration and air quality.

Proposed Change There is no proposed change to the Policy in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0703	Comment	Policy	42	
150/22	Mr Ian Yates			
Detail	I see no reason why detailed guidance cannot be given in relation to point 2 of this policy as to what constitutes unacceptability e.g. minimum acceptable distance from occupied dwelling, which I would like to see set at 1500 meters. The NPPF doesn't seem to have anything to say about wind energy!			
Response	<p>Definition of what is considered 'unacceptable visual impact' would be difficult to define as the acceptability of a scheme would vary in each different landscape. The City Council along with other authorities in Cumbria are working on a Joint Cumulative Impact of Vertical Structures Study which will look into this further and provide guidance on what is considered unacceptable/over saturation. This evidence base, when completed, will help towards assessing when an application is considered to have an 'unacceptable visual impact'. Additionally the Cumbria Wind Energy SPD and the Cumbria Renewable Energy Capacity and Deployment Study and the Cumbria Landscape Capacity Guidance and Toolkit will be used to help assess the visual impact of a proposal.</p> <p>It is not considered appropriate to develop criteria that stipulates a minimum setback distance as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the 1500 metres suggested, however adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect dwellings from potential harm.</p>			
Proposed Change	There is no proposed change to the Policy in response to this comment.			

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

1132 Objection Policy 42

196 Mrs S Tarrant Clerk to Cummersdale Parish Coun

Detail

Wind Energy is an important element in the Government's portfolio of renewable energy. Regardless of the real concerns about the proliferation of wind farms, The Local Plan cannot adopt a stance of No Policy. In order to provide a consistency of assessments, we agree with Para 7.15 (p162) on the continued use of the Cumbria Wind Energy Supplementary Planning Document (SPD).

An important element of this which appears to be missing is a consistent approach by developers to the visualisation of wind farms when they are considered by members of Development Control in Districts across the County.

The County Council organised a seminar on this important aspect, which was held in the chamber at the Civic Centre. This demonstrated how visualisations could be manipulated to make the size of the turbines appear only a third of the actual size.

It is important then that this is addressed in a policy statement that specifies the standard expected of such presentations.

- 1) We urge that the SPD incorporate a section which specifies how the visualisations are to be done before they can be considered by Development Control. That of "The Highland Council" would appear to a sound basis for this
- 2) Although there were officers present at the above seminar, no elected members were invited. At the very least, members of the DC Committee and the working group should have copies of the Power Point presentations or participate in a second presentation.

Response

Comments are noted. Whilst the adoption of visualisation standards in Cumbria is something that is currently being considered, the importance of photomontage in creating a fair and accurate representation of what a development will be like if built out is important. The City Council will continue to work with Cumbria County Council and other Cumbrian authorities in order to establish the best way forward as, understandably, the guidance that it available has not been adopted unanimously. Scottish Natural Heritage have stated that SNH visual representation guidance is currently under review and as such it may be worthwhile waiting to see what is produced. A paragraph will be added into the justification for this Policy to ensure that if/when a standard is adopted by the Cumbrian authorities, this can be added as a requirement to the validation checklist.

Proposed Change

The Policy justification has been updated to include "7.20 It is recognised that related to applications for wind energy development there is guidance available considering visualisation standards, with the aim of improving the accuracy of submitted photomontages. It is considered by some that photomontages that are currently submitted to Planning Authorities throughout the country are substandard and do not accurately represent the impact that a proposal may have on the landscape. The City Council will work with the County Council and other Cumbrian authorities to establish the best approach to take for our area".

0720 Objection Policy 42

151/23 Mr Bob Sharples Sport England

Detail

Wind farms should not be located near sports grounds or water sports facilities. It has been proven that wind shadowing created by the turbines have a detrimental effect on many sports, cricket, sailing, windsurfing etc. Sport England would only support this policy if it specifically identified the need to protect sport. Sport England would only support this policy if it specifically identified the need to protect sport.

Response

Comments are noted. A criterion has been added to this Policy to ensure that the effect of this type of development on any existing recreational facilities or routes has been appropriately considered.

Proposed Change

The Policy has been amended and now states that development proposals will be assessed against the following criteria "6. Effect on any existing recreational facilities or routes";

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

0754 Objection Policy **42**

155/28 Mrs K Woods

Detail
 I strongly object to the proliferation of wind turbines in the area. The area West of Carlisle has become one large wind farm, and the council continues to pass more and more applications for these large industrial structures, without any regard for the major negative impact on the landscape, environment, residents, and amenity of the area - not just adjacent to them but for miles around. Everyone is well aware that the financial incentives for the landowners are the driver, not green energy. The amount of concrete required to support these structures far outweighs the limited benefit of the energy produced.
 I wish to limit the number of applications passed by the council for wind turbines in the area. They are not environmentally friendly, and we have more than enough. The significant negative impact on the landscape, environment, and amenity of the area far outweighs any perceived benefits.
 General Comment: Limit to the number of wind turbines.

Response
 It is important to note that the Council cannot adopt a negative policy towards large scale wind as this would be against national policy and likely to fail the Government's 'test of soundness'. Additionally this stance would not help to promote national priorities or strategic objectives and would be contrary to the findings of the evidence base. With regard to the area to the West of Carlisle being under increasing pressure from wind turbine development, this is largely due to the fact that the majority of the District (outside of this area) is covered by national landscape designations/military constraints therefore pushing development to the areas of the District without constraints whilst maintaining wind speeds.
 There is growing concern over the cumulative impact that turbines are having on the landscape when more than one turbine development can be seen within the same landscape. The suggested proposed route of the North West Coast Connections National Grid project would also cross this area. As a result of this the City Council is now involved in the development of a Cumulative Impact of Vertical Structures Study which will look to develop criteria and GIS based tools to assess the potential impact of a development in relation to Cumulative Impact. This will be beneficial when assessing proposals of this type to the west of Carlisle.

Proposed Change
 There is no proposed change to this Policy in response to this comment.

0775 Support Policy **42**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail
 Support but feel the need for a definition of "scale and visual impact"

Response
 Comment noted however the scale and visual impact of a development will differ with each application. The key point here is that where a development is of unacceptable scale or would have an adverse landscape impact, and it is considered that the policy allows for this assessment to be made each time and for applications to be refused where this is not considered to be, or be able to be made acceptable.

Proposed Change
 There is no proposed change to this Policy in response to this comment.

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

0135 Objection Policy **42**

056 Kathy Woods

Detail How can the local plan be influenced to inhibit the number of wind turbines that are approved?
 My concern is regarding the proliferation of wind turbines in the area to the West of Carlisle, which is rapidly becoming one large wind farm. Having recently attended a planning committee meeting to object to one of the many proposals for turbines, I was really disheartened at the lack of interest from the Planning Case Officer in the devastating effect these large scale industrial structures have on the environment, the impact on residents, and the amenity of the area. The response from the committee to the recommendation of the Planning Case Officer, was that there was no reason in the planning guidance to reject the majority of these applications.

Response The area to the West of Carlisle is under increasing pressure from wind turbine development. This is largely due to the fact that the majority of the District (outside of this area) is covered by national landscape designations/military constraints, therefore pushing development to the areas of the District without constraints whilst maintaining wind speeds. There is growing concern over the cumulative impact that turbines are having on the landscape when more than one turbine development can be seen within the same landscape (as is starting to happen in the west of the District). The suggested proposed route of the North West Coast Connections National Grid project would also cross this area. As a result of this, the City Council is now involved in the development of a Cumulative Impact of Vertical Structures Study for the whole of Cumbria, which will look to develop criteria and GIS based tools to assess the potential impact of a development in relation to Cumulative Impact.

This will help in assessing and mitigating the cumulative landscape impact of a number of turbine developments within the same landscape e.g. The west of the District.

Proposed Change There is no proposed change in response to this comment. The policy justification makes reference to the Cumulative Impact of Vertical Structures Study.

0291 Objection Policy **42**

077 Mr Alan Hubbard National Trust

Detail The wind energy policy raises similar concerns to the general renewables Policy 41 in respect of settings. In addition the wording relating to the WHS could be interpreted as only referring to its wider context and not applying within the WHS itself.

Amend the Policy as follows:
 "4 Effects on Hadrian's Wall World Heritage Site, Scheduled Ancient Monuments, listed buildings, historic structures, historic gardens, parks, battlefields or designated conservation areas, including their settings (dependent on site specific assessment);"

Response Comments are noted and agree.

Proposed Change The Policy has been amended as per comment and now reads as follows, "4. Any effects on Hadrian's Wall World Heritage Site, Scheduled Ancient Monuments, listed buildings, historic structures, historic parks and gardens, battlefields or designated conservation areas, including their settings (dependent on site specific assessment)".

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

0267 Comment Policy **42**

074 Tim Coombe Sustainable Brampton

Detail
 Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.

Community led renewable energy generation schemes are a highly attractive way of meeting wider sustainability targets whilst also promoting economic growth and providing social benefits. Brampton and Beyond Energy (BABE) is a good example of one such project which seeks to benefit from seed-corn investment by the Rural Community Energy Fund (RCEF) sponsored by the DECC and administered through the Waste and Resources Action Programme (WRAP). Investment advice will be provided through Rural Cumbria Connects (RCC), a group of independent advisors who are committed to resourcing and administering multiple community based renewable energy projects. [further comments made regarding aims and how further achievement could be attained]

Response
 Comments are noted. It is recognised that the Plan as a whole needs to be conscious of the potential effects of climate change in the future. The justification of this Policy could be amended to better reflect the potential and importance of community led wind energy schemes in enabling communities to provide their own power source, using wind energy, thus improving their resilience.

Proposed Change
 The Policy justification has been amended to include "The Council will also seek to positively support community-led initiatives for renewable and low carbon energy where they are in line with this policy, for example community led wind energy schemes".

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

0817 Comment Policy **42**

160/35 Mrs Catherine Leach Clerk to Bewcastle Parish Council

Detail "the Council wished to see a distance of 2000 metres between any proposed wind farm and the nearest dwelling."

Response It is not considered appropriate to develop criteria that stipulates a minimum setback distance between residential dwellings and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the 2000 metres suggested, however adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect dwellings from potential harm.

Within guidance published by the Government in June 2013 'Planning practice guidance for renewable and low carbon energy' the document questions if buffer zones/separation distances are appropriate between renewable energy development and other land uses. The study states that "Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis".

Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that at 2000m distance a development will not have an impact and thus it is better to assess this on a case by case basis.

Proposed Change There is no proposed change to the Policy in response to this comment.

0961 Objection Policy **42**

005 Paul Barton Clerk to Dalston Parish Council

Detail The cumulative effects are not adequately considered now.

Response Comments are noted. In relation to cumulative impact of wind turbine development, the City Council is currently working with Cumbria County Council and a number of other Cumbrian authorities on the development of a Cumulative Impact of Vertical Structures Study. This study will look at the cumulative effect of a number of tall structures in the landscape (turbines, pylons, telecoms, masts etc) and will be used to assess instances where it is considered that the landscape has reached the point of saturation. This study will be used when determining applications of this type when completed (expected end 2013).

Proposed Change There is no proposed change to the Policy in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0918	Comment	Policy 42	160 - 164	
190	Mrs Patricia McDonald	Clerk & RFO to Orton Parish Council		
Detail	Carlisle City Council the standards as follows: 'the visualisation standards for wind energy developments' as adopted by the Highlands Council, Scotland. Wish the council to adopt the Highlands council standards.			
Response	Comments are noted. Whilst the adoption of visualisation standards in Cumbria is something that is currently being considered, the importance of photomontage in creating a fair and accurate representation of what a development will be like if built out is important. The City Council will continue to work with Cumbria County Council and other Cumbrian authorities in order to establish the best way forward as, understandably, the guidance that it available has not been adopted unanimously. Scottish Natural Heritage have stated that SNH visual representation guidance is currently under review and as such it may be worthwhile waiting to see what is produced. A paragraph will be added into the justification for this Policy to ensure that if/when a standard is adopted by the Cumbrian authorities, this can be added as a requirement to the validation checklist when applications of this type are submitted.			
Proposed Change	The Policy justification has been updated to include "7.20 It is recognised that related to applications for wind energy development there is guidance available considering visualisation standards, with the aim of improving the accuracy of submitted photomontages. It is considered by some that photomontages that are currently submitted to Planning Authorities throughout the country are substandard and do not accurately represent the impact that a proposal may have on the landscape. The City Council will work with the County Council and other Cumbrian authorities to establish the best approach to take for our area".			
0018	Comment	Policy 42	160 - 164	
010	Richard Ritson	Chair of Kingwater Parish Council		
Detail	RAF Spadeadem takes up a large % of the Parish, therefore probably wouldn't allow wind energy development. SMALL scale development may be possible and supported.			
Response	Comments are noted and agree.			
Proposed Change	There is no proposed change in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0103	Objection	Policy	42	161
049	Mr D Nash			
Detail	<p>The plan sets out 7 statements, which realistically could apply to any town or city in the country. These statements lack robustness e.g. The plan would benefit from the addition of the following statements:</p> <ul style="list-style-type: none"> - "Land based Wind and Solar Developments will not be allowed within 1,000 metres of residential property." - "No wind farm in excess of two square acres will be permitted of xxx five turbines of xxx height may consider.." 			
Response	<p>The Policy criteria that is set out has been established in order to assess each development on its own merits and it is therefore not considered appropriate to develop criteria that stipulates a minimum setback distance between residential dwellings and wind turbine developments as it is considered that the nature of each potential development site varies. Setting one threshold for the whole of the District would be complex, difficult to justify and open to challenge. The impact of a wind energy proposal may be wider than the 1000 metres suggested, however adopting a set standard would not allow for this impact to be fully considered. Furthermore, the preferred option has criteria to protect amenity on a case-by-case basis and this is considered to be the best method to protect dwellings from potential harm. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. It is therefore considered that the Preferred approach to this policy would allow applications to be determined on a case-by-case basis as to what circumstances that proposals are likely to be acceptable. This is in line with the new Planning Practice Guidance for renewable and low carbon energy that was released by the Government in July 2013.</p> <p>Within guidance published by the Government in June 2013 'Planning practice guidance for renewable and low carbon energy' the document questions if buffer zones/separation distances are appropriate between renewable energy development and other land uses. The study states that "Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis".</p> <p>Given this guidance, a criteria based Policy, like the one proposed within the emerging Local Plan, appears to be the best way to progress, as the only evidence to suggest a setback distance on safety is a 300m buffer taken from the ETSU-97 guidance. There is no evidence to suggest that at 1000m distance a development will not have an impact and thus it is better to assess this on a case by case basis.</p>			
Proposed Change	<p>There is no proposed change to the Policy in response to this comment.</p>			

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

0512	Objection	Policy	42	161
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. We support reference to the historic environment when considering proposals for wind energy. The policy would benefit with referring to the NPPF in terms of significance regarding the impact on heritage assets and not context. In relation to the WHS, any proposals will be expected to be in accordance with the Management Plan and conserve its Outstanding Universal Value</p> <p>Criterion 5 should be amended to read ""Impact on the significance of heritage assets" Additional criteria should be introduced "The impact on the WHS and conservation of its Outstanding Universal Value and be in line with the aims and objectives of the Management Plan"</p> <p>Para 7.16: The justification fails to refer to the Management Plan for the WHS, which should be used when determining applications for wind energy. Suggest: Insert reference to the WHS Management Plan.</p>			
Response	Comments are noted and changes to the Policy and Justification have been made accordingly.			
Proposed Change	<p>Policy criterion 4 has been amended and now states "4. Impact on the significance of heritage assets including the impact on Hadrian's Wall World Heritage Site and conservation of its Outstanding Universal Value, Scheduled Ancient Monuments, listed buildings, historic structures, historic parks and gardens, battlefields or designated conservation areas, including their settings (dependent on site specific assessment)";</p> <p>and</p> <p>"Additionally proposals that could impact on Hadrian's Wall World Heritage Site or its Outstanding Universal Value should be assessed against the aims and objectives of the Hadrian's Wall World Heritage Site Management Plan".</p>			

0776	Support	Policy	43	
156/29-31	Mr Viv Dodd	Cumbria Business for Business		
Detail	Support			
Response	Comment of support noted.			
Proposed Change	There is no proposed change in response to this comment.			

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

0442 Comment Policy **43**

098 Sainsbury's Supermarkets Ltd A015

Detail Sainsbury's has adopted an innovative and robust corporate strategy that includes significant investment in the development of energy efficient, low carbon stores that regularly include renewable energy technologies. Sainsbury's welcomes the Council's commitment to sustainable development through the promotion of policies to encourage climate change adaptation and mitigation. Sainsbury's supports the flexibility within the draft policy which will allow them to adopt the most appropriate sustainability strategy for their stores in the context of the unique circumstances each project faces. As a minimum, however, Sainsbury's strategy is to minimise the carbon footprint and environmental impact of their stores wherever possible.

Response Positive comments are noted relating to the importance of working to reduce the carbon footprint and environmental impact of development.

Proposed Change There is no proposed change to the Policy in response to this comment.

0858 Objection Policy **43**

173 Cllr Bloxham

Detail I am disappointed that there appears to be no mention of other forms of energy supply!
 (1) Hydro.
 (2) Air source heat pumps.
 (3) Ground source heat extraction.

There does not seem to be any mention of the new phenomenon that is the sola farms and if we would permit them to be built on agricultural land or not, how many would be acceptable where they would be acceptable.

Response Comments are noted. Hydro and solar schemes are covered under Policy 41- Renewable Energy. Reference will be made within this Policy to mention alternative methods of heating including air source heat pumps and ground source heat extraction.

Proposed Change The Policy has been updated and now includes "The principles should be introduced in the early stages of the design process in order to consider the orientation of buildings to maximise solar gain coupled with high levels of insulation to reduce heating costs and introduce options for alternative methods of heating, including air source heat pumps and ground source heat extraction".

0962 Support Policy **43**

005 Paul Barton Clerk to Dalston Parish Council

Detail Happy with this

Response Comments are noted.

Proposed Change There is no proposed change in response to this comment.

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

0268 Comment Policy **43**

074 Tim Coombe Sustainable Brampton

Detail Community resilience in its widest sense does not feature prominently as a term used within the Plan. The Plan should support all policies that will enable local communities to become more self-sufficient and less dependent on external support for the maintenance of high living standards through the supply of goods and services. Resilience lies at the heart of the Localism Act. The Plan should therefore seek to test the resilience of every policy just as it seeks to test sustainability in the SA. Policies should not only be sustainable but priority should be given to policies which would enable communities better to survive in the event of national crises. Climate change is one such emerging crisis and although the 2007 Nottingham Declaration features prominently in the section on renewable energy (see Annex A for the full statement), since climate change is already affecting many aspects of life in Cumbria, we consider that the declaration signed by the City Council in 2007 should feature as a major driving force in the Local Plan. SB will be running a Resilience workshop for the Brampton Economic Partnership towards the end of 2013 to address these issues.

Community led renewable energy generation schemes are a highly attractive way of meeting wider sustainability targets whilst also promoting economic growth and providing social benefits. Brampton and Beyond Energy (BABE) is a good example of one such project which seeks to benefit from seed-corn investment by the Rural Community Energy Fund (RCEF) sponsored by the DECC and administered through the Waste and Resources Action Programme (WRAP). Investment advice will be provided through Rural Cumbria Connects (RCC), a group of independent advisors who are committed to resourcing and administering multiple community based renewable energy projects. [further comments made regarding aims and how further achievement could be attained]

Response The main aim of this Policy is to encourage the development of more energy efficient building techniques and design in order to help to future proof developments and make them more resilient to the effects of climate change, which appears to be in line with this comment. In relation to community-led renewable energy, the Policy text has been amended to include support for community led renewable energy schemes.

Proposed Change Policy has been updated to state "This includes support for community led renewable energy schemes/projects".

1028 Support Policy **43**

194 Michael Barry Cumbria County Council

Detail This policy seeks to encourage energy conservation measures in new development and is welcome.

Response Comment of support noted.

Proposed Change There is no proposed change in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0462	Support	Policy	43	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District strongly supports this policy. We consider that it is very forward thinking and will lead to development which will be more energy efficient, therefore both reducing CO2 and saving the residents/occupiers considerable amounts of money due to reduced heating, lighting and water bills.			
Response	Comments are noted and agree.			
Proposed Change	There is no proposed change in response to this comment.			
0292	Support	Policy	43	
077	Mr Alan Hubbard	National Trust		
Detail	In the context of the overall consideration of energy matters this is a key policy and National Trust is pleased to support it – indeed in terms of the energy hierarchy it is of greater importance than the policies on renewables and arguably should therefore precede them in the Local Plan.			
Response	The order of the Policies in each chapter does not relate to how important they are considered to be. Each Policy in the chapter is considered to be of equal weight.			
Proposed Change	There is no proposed change in response to this comment.			
0513	Objection	Policy	43	165
104	Emily Hrycan	English Heritage North West		
Detail	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. The historic environment should be considered in delivering a number of other planning objectives. This policy does not make reference to the historic environment and does not demonstrate the requirement to consider the impact of any proposals such as photovoltaic panels on its significance.			
Response	This Policy should be amended to include reference to the historic environment including impact on the significance of heritage assets. Comments are noted and agree. The Policy has been updated to include reference to the historic environment when assessing applications that incorporate renewable energy/energy efficiency technologies.			
Proposed Change	The Policy has been updated to include "Special consideration should be given to the historic environment when assessing applications that incorporate any renewable energy/energy efficiency technologies that could impact on a historic structure or its setting".			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0064	Objection	Policy 43	179	
033	Matthew Good	Home Builders Federation		
Detail	<p>The policy is unsound as it is not justified by relevant evidence. The effect of the policy could seriously jeopardise development viability in Carlisle. Policy 43 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's national standards for construction are set out within the Building Regulations. The Council has not provided an adequate justification for departing from these standards. The Council is still to undertake a whole plan viability study and therefore it cannot ascertain the impact that this policy will have upon the viability of sites. The AHEVA does, however, indicate viability problems across significant parts of the district. Whilst it is noted the policy provides opportunities for negotiation, this should only apply to a minimum number of special cases. The Council need to ensure its policies are sustainable in the majority of cases and should not attempt to insist upon additional burdens upon development which have not been tested for their impact upon viability.</p> <p>Recommendation: It is recommended that this policy be deleted due to its impact upon development viability.</p>			
Response	<p>Comments are noted. It is considered that due to the progressive tightening of national standards through Building Regulations, the requirement for development to seek to improve CO2 emissions savings above the Building Regulations baseline should be removed from this Policy. The Development, Energy Conservation and Efficiency Policy will remain in order to encourage development to build to high standards of efficiency and thus reduce our carbon footprint. There was also concern that this requirement may be difficult to enforce.</p>			
Proposed Change	<p>This Policy has been amended to remove reference to the requirement for development to build to a higher standard than current building regulations.</p>			
0308	Objection	Policy 43	7.35	
078	Mr Trevor Wilson			
Detail	<p>[Link to Rep 0307] Policy 43 has no mention whatsoever regarding passiv haus. Paragraph 7.35 states 'The Government's target is for new homes to be zero carbon by 2016 with the ambition for non-domestic buildings to be zero carbon by 2019.' This should be implemented now and not wait until 2019.</p> <p>Rewrite Policy 43 paragraph 7.35:</p> <ul style="list-style-type: none"> - to specifically mention passive haus and require developments to exceed building regulations part L and to meet passive haus (or equivalent) standards - The Government's target is for new homes to be zero carbon by 2016 with the ambition for non-domestic buildings to be zero carbon by 2019 – this target is to be effectively immediately for all planning applications to Carlisle City Council. <p>Passive haus or similar standards should apply to all developments.</p> <p>Passive haus only appears in policy 28 – update the plan so that passive haus explicitly appears in other relevant sections.</p>			
Response	<p>Comments are noted however requiring a standard over and above what is prescribed by the Government would be difficult to justify and enforce. This Policy will help in encouraging developers to build to a higher energy efficiency standard and will be supportive of development that aims to achieve zero carbon and Passivhaus standards.</p>			
Proposed Change	<p>Reference has been made to Passivhaus within the Policy Justification; "The Passivhaus standard is one such energy performance standard where the heating requirement is reduced to the point where a traditional heating system is no longer considered essential. A typical Passivhaus uses up to 90% less heating/cooling energy use, equating to 60-80% overall energy savings, therefore providing an extremely energy efficient building. The Council would welcome applications for this type of energy efficient development".</p>			

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

0963 Objection Policy **44**

005 Paul Barton Clerk to Dalston Parish Council

Detail Developments should not be permitted where the property cannot be insured. No development in flood zone 3

Response Comments are noted. The Policy has been written in a way that development would only be considered appropriate within Flood Zone 3 where it is water compatible or less vulnerable use. Proposals for highly vulnerable uses would not be permitted within Flood Zone 3 (such as police, ambulance, fire stations, basement dwellings, caravans etc) and proposals for essential infrastructure and more vulnerable uses (such as dwelling houses) would only be acceptable where it can be demonstrated that the Sequential and Exception Tests have been passed showing that there are no other available sites within lower flood risk zones and where it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. This therefore demonstrates that whilst in some cases development would be permitted within flood zone 3, this would only be in a small minority of cases where the proposal is accompanied by a site-specific flood risk assessment demonstrating that it is safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Proposed Change There is no proposed change to the Policy in response to this comment.

0205 Objection Policy **44**

070 Mr R Coad A013

Detail Where sites can satisfy the Sequential Test and / or Exceptions Test, in accordance with the NPPF, they should not be discounted as potential development sites. It is therefore proposed that Criterion 1 of the policy is amended to say Zone 3a and 3b and remove reference to Zone 2. Furthermore, with regard to the Local Plan Proposals Map for Rockcliffe, the identified Flood Zone area is subject to change. It is our understanding that the flooding issues to which the Proposal's Map refers arose due to lack of dredging by riparian owners downstream of the culvert beneath the C1016 Rockcliffe - Floriston Road. These issues were resolved back in 2007/8. The existing Flood Risk boundary should therefore not have any adverse impact on the future allocation of a site without detailed discussions taking place with the Environment Agency. With therefore continue to support the identification of the whole of Site RO04 as a housing allocation site during this plan period and consider that there are no physical (or other) constraints as to why this site can not be brought forward for development during the plan period. [Rep 0197]

Response Comments are noted however it is considered that through this Local Plan and in line with national guidance, LPA's should be working towards directing development away from flood risk areas wherever possible. The Sequential and Exception Tests help to determine whether other sites in lower flood risk areas are available for the proposed development or where it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. The policy criteria therefore does not discount potential development sites where they can satisfy the Sequential and/or Exception Test and it therefore considered that it would be inappropriate to remove reference to Zone 2 as ideally all development should be directed towards flood zone 1.

Additionally, with regard to the flood risk situation at Rockcliffe, recent detailed modelling of Rockcliffe Beck has had a significant impact on the flood map outline for the village. It is now recognised that site ref RO04 is no longer within a flood risk zone.

Proposed Change There is no proposed change in response to this comment.

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

0417 Comment Policy **44**

097 Amy Heys Environment Agency

Detail

We are very supportive of the work that you have done to understand flood risk within the Carlisle District and the positive approach you have taken to avoiding new development within areas at risk. We consider that you have a robust and credible evidence base in your Strategic Flood Risk Assessments. We would like to suggest a couple of small but important changes to the wording of policy 44 Flood Risk and Development. These changes will allow policy 44 to better reflect the local flood risk situation in Carlisle and therefore better serve yourselves and developers when it is used.

When setting out issues to be considered in a flood risk assessment in section 2 we request that you include reference to the following issue:

- Where flood defences exist the residual risk of flooding that remains behind defences must be considered. This should include reference to overtopping of defences in extreme events and possible breach analysis.

When guiding developers towards relevant evidence in section 3 we suggest that you caveat your reference to your Strategic Flood Risk Assessments with:

- "or the most up to date flood risk information available."

This is because modelling of flood risk will inevitably move on in the next few years and it is important to allow the reference here to stay relevant for the lifetime of the plan.

Your statement on SUDs in policy 44 seems to be weaker than policy 45 Sustainable Drainage Systems. We consider that you should change the wording in Policy 44 to bring it in line with Policy 45. This could be done by deleting the first few words of section 5, so that it reads:

- incorporate sustainable drainage systems;

Recently minor flooding has been experienced from smaller watercourses to the north east of the city, mainly on Gosling Syke. We wish to inform you that we are considering building a flood storage area on Gosling Beck (see attached map) which will alleviate existing flooding problems in that area. If this problem was left unaddressed it could impact on proposed development in the north east of the city. We would like this area to be allocated for this purpose and protected from other development. The scheme will cost approximately £500,000 to deliver, at the moment we have a funding gap to fill of £100,000. [location plan attached]

Response Comments are welcomed and agree.

Proposed Change The Policy has been updated to reflect these comments.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0165	Comment	Policy	44	
062		Church Commissioners for England	A013	
Detail	Where sites can satisfy the Sequential Test and / or Exceptions Test, in accordance with the NPPF, they should not be discounted as potential development sites. It is therefore proposed that Criterion 1 of the policy is amended to say Zone 3a and 3b and remove reference to Zone 2.			
Response	Comments are noted however it is considered that through this Local Plan and in line with national guidance, LPA's should be working towards directing development away from flood risk areas wherever possible. The Sequential and Exception Tests help to determine whether other sites in lower flood risk areas are available for the proposed development or where it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. The policy criteria therefore does not discount potential development sites where they can satisfy the Sequential and/or Exception Test and it therefore considered that it would be inappropriate to remove reference to Zone 2 as ideally all development should be directed towards flood zone 1.			
Proposed Change	There is no proposed change to the Policy in response to this comment.			
1029	Objection	Policy	44	
194	Michael Barry	Cumbria County Council		
Detail	<p>A number of points with respect to this policy are raised to better ensure its effectiveness. We also wish to point out that when development takes place on land adjoining a main river or ordinary watercourse. It has become common practice for the planning authorities (on the advice of the Environment Agency or LLFA) to require the developer to leave a strip of land, at least 5-8m wide, free from development along one or both sides of a watercourse, in order to provide access for future maintenance and space for the watercourse in flood. We will expect Carlisle City Council as Planning Authority to respond to such requirements when raised under any consultation made to the LLFA for advice on localised flooding</p> <p>Suggested Changes:</p> <ul style="list-style-type: none"> - In paragraph 7.42 supporting this policy it should be noted that Environment Agency maps do identify flood defences and the text here should be updated to reflect this. - Further provisions of the Flood & Water Management Act 2010 are expected to make a the LLFA a statutory consultee on planning applications as well as the Environment Agency to capture advice available on localised flooding. We suggest the following is added to paragraph 7.43: ".....in relation to their flood zone definition. Cumbria County Council as Lead Local Flood Authority will similarly be consulted on areas vulnerable to localised flooding." - To paragraph 7.47 We suggest the following is added: "The Environment Agency is responsible for providing land drainage consent for works in or near main rivers. Similarly, Cumbria County Council as LLFA are responsible for providing consent for works in or near ordinary (smaller) watercourses." 			
Response	Comments are noted and agree. The Policy justification has been updated accordingly.			
Proposed Change	Policy Justification has been updated and states "Additionally, when development takes place on land adjoining a main river or ordinary watercourse it has become common practice for planning authorities to require the developer to leave a strip of land, at least 5-8m wide, free from development along one or both sides of a watercourse, in order to provide access for future maintenance and space for the watercourse in flood. The Environment Agency is responsible for providing land drainage consent for works in or near main rivers. Similarly, Cumbria County Council as Lead Local Flood Authority (LLFA) is responsible for providing consent for works in or near ordinary (smaller) watercourses".			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0316	Support	Policy	44	
078	Mr Trevor Wilson			
Detail	Policy supported.			
Response	Comment of support noted.			
Proposed Change	There is no proposed change to the Policy in response to this comment.			
0333	Objection	Policy	44	
081		HS Cartmell		A013
Detail	Where sites can satisfy the Sequential Test and / or Exceptions Test, in accordance with the NPPF, they should not be discounted as potential development sites. It is therefore proposed that Criterion 1 of the policy is amended to say Zone 3a and 3b and remove reference to Zone 2.			
Response	Comments are noted however it is considered that through this Local Plan and in line with national guidance, LPA's should be working towards directing development away from flood risk areas wherever possible. The Sequential and Exception Tests help to determine whether other sites in lower flood risk areas are available for the proposed development or where it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. The policy criteria therefore does not discount potential development sites where they can satisfy the Sequential and/or Exception Test and it therefore considered that it would be inappropriate to remove reference to Zone 2 as ideally all development should be directed towards flood zone 1.			
Proposed Change	There is no proposed change in response to this comment.			
0370	Comment	Policy	44	
088	Elizabeth Allnutt	Save Our Streets		
Detail	Closer definition of "water compatible" uses in Flood Zones 2 and 3 would be useful. An indication that these will be stringently applied would also be beneficial. SOS would support the principles in this Policy			
Response	Comments of support are noted. 'Water Compatible' uses are defined in the Technical Guide to the NPPF and include; flood control infrastructure, sewage transmission infrastructure and pumping stations, water-based recreation (excluding sleeping accommodation), amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms etc.			
Proposed Change	The policy has been updated and now states that new development is required to "1. Be located away from Flood Zones 2 and 3 wherever possible, with the exception of water compatible uses and key infrastructure (as defined in the Technical Guide to the NPPF)".			

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

0748 Comment Policy **44**

154/26/27 Mr Bryan Craig

Detail Should we not be restricting all development on Flood Zone 3 land. It is now obvious that obtaining insurance is difficult and excessively expensive and therefore we should not support development in these areas.

Response Comments are noted. The Policy has been written in a way that development would only be considered appropriate within Flood Zone 3 where it is water compatible or less vulnerable use. Proposals for highly vulnerable uses would not be permitted within Flood Zone 3 (such as police, ambulance, fire stations, basement dwellings, caravans etc) and proposals for essential infrastructure and more vulnerable uses (such as dwelling houses) would only be acceptable where it can be demonstrated that the Sequential and Exception Tests have been passed showing that there are no other available sites within lower flood risk zones and where it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.
This therefore demonstrates that whilst in some cases development would be permitted within flood zone 3, this would only be in a small minority of cases where the proposal is accompanied by a site-specific flood risk assessment demonstrating that it is safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Proposed Change There is no proposed change to the Policy in response to this comment.

0777 Support Policy **44**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Comment is noted.

Proposed Change There is no proposed change in response to this comment.

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

0843 Objection Policy **44**

170/45 Mr Nick Sandford The Woodland Trust

Detail It is noted in the summary of previous comments that reference was made to the role of woods and trees planted in appropriate locations in helping to alleviate flooding. Research also shows that woodland can bring about big improvements in water quality. We were disappointed therefore to see that this is not explicitly stated in the policy or the supporting text.

Include a reference to the role of trees and woods in helping to alleviate flooding. Research evidence to this effect can be found in a report on the Woodland Trust website at www.woodlandtrust.org.uk/publications, where is shown that the speed of certain types of flooding can be significantly reduced by appropriate woodland planting, thus allowing people more time to respond to the situation and, for example, evacuate their homes.

Response Comments are noted and the Policy Justification has been updated to reflect this comment.

Proposed Change The Policy Justification now states "Additionally, the natural environment and trees in particular can play a huge part in helping to absorb surface water run-off by creating hedges, tree belts and wooded areas where they will help soak up rainfall and slow down water runoff".

0217 Comment Policy **45**

072 Miss Alice Unsworth NFU

Detail The NFU would want to be assured that there would be adequate storage available to prevent flooding of the local farmland, which causes both environmental and economic damage.

Response Comments are noted. It is the intention of this Policy to help to control surface water run off as near to its source as possible in order to help to reduce the need for investment in flood management and protection measures by mitigating any additional flood risk that new development might generate. It is therefore considered that adequate water storage methods would be developed as part of development applications therefore reducing the impact of a development on surrounding farmland.

Proposed Change There is no proposed change in response to this comment.

0206 Comment Policy **45**

070 Mr R Coad A013

Detail Whilst we support this policy in respect of detailed / full planning applications and Reserved Matters Applications, it is considered that this policy is too onerous in respect of Outline planning applications and the policy wording and supportive text should be amended in accordance with this.

Response Comments are noted. The Policy Justification has been updated accordingly.

Proposed Change The Policy Justification has been updated to state "Where Outline planning applications are submitted, a condition will be attached to state that drainage will be dealt with at reserved matters stage however it will be expected that where practical Sustainable Drainage Systems (SUDs) should be incorporated as the means for the disposal of surface water in the first instance".

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

0166 Objection Policy **45**

062 Church Commissioners for England A013

Detail Whilst we support this policy in respect of detailed / full planning applications and Reserved Matters Applications, it is considered that this policy is too onerous in respect of Outline planning applications and the policy wording and supportive text should be amended in accordance with this.

Response Comments are noted. The Policy Justification has been updated accordingly.

Proposed Change The Policy Justification has been updated to state "Where Outline planning applications are submitted, a condition will be attached to state that drainage will be dealt with at reserved matters stage however it will be expected that where practical Sustainable Drainage Systems (SUDs) should be incorporated as the means for the disposal of surface water in the first instance".

0317 Support Policy **45**

078 Mr Trevor Wilson

Detail Support.

Response Comment of support is welcomed.

Proposed Change There is no proposed change in response to this comment.

0964 Support Policy **45**

005 Paul Barton Clerk to Dalston Parish Council

Detail No Issues

Response Comment noted.

Proposed Change There is no proposed change in response to this comment.

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

0778 Support Policy **45**

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Comment noted.

Proposed Change There is no proposed change to the Policy in response to this comment.

0334 Comment Policy **45**

o81 HS Cartmell A013

Detail Whilst we support this policy in respect of detailed / full planning applications and Reserved Matters Applications, it is considered that this policy is too onerous in respect of Outline planning applications and the policy wording and supportive text should be amended in accordance with this.

Response Comments are noted. The Policy Justification has been updated accordingly.

Proposed Change The Policy Justification has been updated to state "Where Outline planning applications are submitted, a condition will be attached to state that drainage will be dealt with at reserved matters stage however it will be expected that where practical Sustainable Drainage Systems (SUDs) should be incorporated as the means for the disposal of surface water in the first instance".

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

REPRESENTATIONS

RepNo Status Paragraph Page Map

Consultee Ref No Consultees.Contact Organisation Agent

Chapter o8

0779 Support Policy

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Comment of support noted.

Proposed Change There is no proposed change in response to this comment of support.

0170 Objection Policy 8.1 175

063 Ms Rose Freeman The Theatre Trust

Detail Item 7 of the National Planning Policy Framework on page 2 states that there are three dimensions to support economic development, one being a social role to support communities' health, social and cultural well-being. We object to the exclusion of the word 'social' in the title and the absence of any reference to 'cultural' wellbeing. This section of the document only refers to healthy matters and education.
Cultural infrastructure and activities are fundamental to most of the things that local politics is trying to achieve - from nurturing a creative younger generation to keeping the elderly mentally and physically fit, and the topic of cultural wellbeing is usually linked to the intellectual and physical health of a community. It concerns people being comfortable in their local environment because these are places that make our localities distinctive, and local distinctiveness is very much valued by people.

We suggest the title to this section should be amended to Health and Education and the 'wellbeing' element, being intangible rather than practical, has not been addressed and overlaps with other sections of the document.

Response Comment is noted. The chapter title has been amended to Health, Education and Community.

Proposed Change The chapter title has been amended to 'Health, Education and Community'.

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

0563 Objection Policy **46**

121 Mike Fox Brampton Economic Partnership

Detail 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';
[Comment supported by Burtholme Parish Council]

Response It is worth noting that the preferred option site allocation for the Brampton medical centre may be amended so that the Medical Centre is positioned within the eastern side of the proposed development site. This alteration makes the proposed site slightly closer to the town centre. One of the main reasons for the allocation of a new medical centre is that the current surgery is no longer fit for purpose. Whilst their current position within the centre of Brampton is ideal, its nature as a historical market town has meant that there are limited opportunities for the surgery to expand. The creation of a new medical centre would allow for new modern facilities and adequate parking to be achieved. Brampton Medical Practice is supportive of this site having considered a number of other sites in previous years. Bus provider Stagecoach has suggested that whilst there is not a route passing the site at present, this is something that could be achieved. This will help to improve the accessibility of this site. Whilst it is recognised that a number of patients visiting the current doctors surgery within the centre of Brampton will go on to use other facilities in the town centre, there is no evidence to suggest that this would not continue to happen or that visitors to the proposed doctors surgery would not then go into the centre of Brampton to shop. It may in fact relieve some of the parking issues within the centre.

Proposed Change There is no proposed change to the Policy in response to this comment.

0399 Objection Policy **46**

094 Cllr Betton

Detail Botcherby is classed as a deprived area and it would be nice to see the encouragement of a Health Centre within its ward where a GP practice, dentists and other health profession practices to community can be built and encouraged, an area for this would be as suggestion Rosehill car park which is I believe our land. A lot of Botcherby residents have to travel into town and beyond for these services, they are on low or no income, most do not have cars and can not afford to travel, other areas have them.

Response The role of this Local Plan Policy is to guide the development of medical facilities towards the most appropriate locations. Whilst the Local Plan can help in the identification and allocation of new sites for the provision of such medical facilities, it is not the role of the Local Plan to provide these services. It is therefore not the place of the Local Plan to allocate new sites for such need speculatively however if it is considered by medical professions/NHS that new services are required, the Local Plan will play a supportive role in their development.

Proposed Change There is no proposed change to the Policy in response to this comment.

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

1122 Comment Policy **46**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail Facilities are currently limited and over stretched. In particular dentistry, NHS patients find it difficult to find a practice willing to take them on. There needs to be a planned upgrade of Health services to adequately cover any additional growth to the City and surrounding areas, both in terms of doctors and dentists

Response Whilst the Local Plan can help in the identification and allocation of new sites for the provision of such medical facilities, it is not the role of the Local Plan to provide these services. It is therefore not the place of the Local Plan to allocate new sites for such need speculatively.

Proposed Change There is no proposed change to the Policy in response to this comment.

1030 Comment Policy **46**

194 Michael Barry Cumbria County Council

Detail This policy sets out the criteria against which proposals for new doctors surgeries are considered and is welcomed.
A proposal for a new Medical Centre in Brampton has been noted. This site is somewhat poorly related to the Town Centre and the City Council may wish to consider whether there are alternative options that are better related to the Town Centre. Should this site remain a preferred option, it will be important that members of the public will be able to access the site without significant difficulty.
Suggested Changes:
Review options for the provision of a new medical centre in Brampton.

Response It is worth noting that the preferred option site allocation for the Brampton medical centre may be amended so that the Medical Centre is positioned within the eastern side of the proposed development site. This alteration makes the proposed site slightly closer to the town centre. One of the main reasons for the allocation of a new medical centre is that the current surgery is no longer fit for purpose. The creation of a new medical centre would allow for new modern facilities and adequate parking to be achieved. Brampton Medical Practice is supportive of this site having considered a number of other sites in previous years. Bus provider Stagecoach has suggested that whilst there is not a route passing the site at present, this is something that could be achieved.

Proposed Change There is no proposed change to the Policy in response to this comment.

0819 Comment Policy **46**

160/35 Mrs Catherine Leach Clerk to Bewcastle Parish Council

Detail The Council wished to note that accessibility by public transport was irrelevant to parishes like Bewcastle where no such facilities are available.

Response Comments are noted however it is considered important to include a policy to require accessibility by public transport for those developments within the urban area or larger rural towns and villages.

Proposed Change There is no proposed change to the Policy in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0311	Objection	Policy	46	8.4
078	Mr Trevor Wilson			
Detail	The Policy Statement box has 4 bullets but does not mention explicitly public transport access. Paragraph 8.4 re Brampton – earlier comments. [See Rep 0298]			
Response	The policy to include a specific statement that the site is accessible by public transport and if bus routes require changes then the application to be supported by written statement from the relevant authority, e.g. Stagecoach who run most of the bus services and/or Cumbria County Council who arrange contracted bus services.			
Proposed Change	Criterion 1 of the Policy states that sites should be accessible by public transport. This criterion will be amended to state that sites should be accessible by, or can be made accessible by public transport. Additional text has been added to the Justification to state the importance of accessibility via public transport.			
0618	Comment	Policy	47	
129	Mrs M C Ryan		Clerk to Burtholme Parish Council	
Detail	The parish council would like to add their concerns regarding planning for the increasing school population as it has been noted that there is likely to be greater demand for school places in the near future.			
Response	Comments are noted. It is the responsibility of Cumbria County Council as Local Education Authority to identify where there is capacity within existing schools, where capacity can be created or where new schools are required. The City Council has been working closely with the County Council when looking to allocate sites for development in order to establish what the current situation is regarding education in each area. Development contributions will help towards creating increased school places resulting from new development.			
Proposed Change	There is no proposed change to the Policy in response to this comment.			
0815	Objection	Policy	47	
160/35	Mrs Catherine Leach		Clerk to Bewcastle Parish Council	
Detail	It was felt that, where the size of development required a new school, it should be built as soon as the extra places were needed. No further houses should be built until the school provision was in place.			
Response	Comments are noted. It is the responsibility of Cumbria County Council as Local Education Authority to identify where there is capacity within existing schools, where capacity can be created or where new schools are required. The City Council has been working closely with the County Council when looking to allocate sites for development in order to establish what the current situation is regarding education in each area. Development contributions will help towards creating increased school places resulting from new development or towards the development of a new school. Where a new school is required, this Policy will be used to help in determining the most appropriate location for such development. The decision as to when a new school will be required to come on line will be determined by the County Council (working with the developer) through the use of legal agreements. This is not something that comes straight away, often due to viability.			
Proposed Change	There is no proposed change to the Policy in response to this comment.			

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

0978 Objection Policy **47**

193 Sue Tarrant Clerk to Wetheral Parish Council

Detail
 Need to understand what the minimum number of households needed within a catchment area to justify the construction of a new school. The current number of households in Wetheral is 661, with the children travelling to Scotby, further homes are proposed in Wetheral, there will be a definite need for a primary school. The County Council have a site available within the curtilage of the village. The major concern is that the plan is being produced without close consultation with the County Council who are responsible for Education. If the District Council allow planning permission for 98 houses, in addition to the proposed planning application at Hall Moor Court 29 units and the County Council don't have enough money to build a new school. There is no evidence of District and County working closely together. Need to ensure that the plan includes new schools in villages where development is proposed, with clear evidence of the District County Council working together.

Response
 Comments are noted. It is the responsibility of Cumbria County Council as Local Education Authority to identify where there is capacity within existing schools, where capacity can be created or where new schools are required. The City Council has been working closely with the County Council when looking to allocate sites for development in order to establish what the current situation is regarding education in each area. Development contributions will help towards creating increased school places resulting from new development or towards the development of a new school.

Proposed Change
 This comment has been sent to Cumbria County Council as Local Education Authority for comment.

1031 Objection Policy **47**

194 Michael Barry Cumbria County Council

Detail
 Background information submitted. Suggested Changes:
 - Policy should be revised to include a presumption in favour of the need to expand, alter and improve existing school facilities and embrace appropriate renewable technologies at these premises – subject to other relevant policies in the plan.
 - The policy should make explicit reference to the potential role of developer contributions in supporting the delivery of school places and cross refer to Policy 40.

Response
 Comments are noted and agree. The Policy has been updated accordingly.

Proposed Change
 This Policy has been updated to reflect the County Council comments.

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

1118 Comment Policy **47**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail Primary schooling in rural areas around Carlisle is already near to capacity or already oversubscribed, with parents having to consider the possibility of transporting children around the City to secure a placing. All secondary school students not attending William Howard School in Brampton or Caldew School in Dalston, have to be transported daily into Carlisle from all the surrounding areas. There is a definite need for a new secondary school north of the river to accommodate the ever increasing number of students in the satellite communities.

Response Comments are noted. It is the responsibility of Cumbria County Council as Local Education Authority to identify where there is capacity within existing schools, where capacity can be created or where new schools are required. The City Council has been working closely with the County Council when looking to allocate sites for development in order to establish what the current situation is regarding education in each area. Development contributions will help towards creating increased school places resulting from new development. Where a new school is required, this Policy will be used to help in determining the most appropriate location for such development.

Proposed Change There is no proposed change to the Policy in response to this comment.

0381 Objection Policy **48**

089 Elizabeth Allnutt National Allotments Society

Detail Allotments should be included in the list of facilities considered important to the community where development will be permitted if the provisos allowed for can be demonstrated. Allotment sites often engender strong community ties and are vulnerable to being sold off or proposed for development. Suggest: include allotments in the list of important rural facilities.

Response Comments are noted. Allotments will be mentioned within the Policy.

Proposed Change The Policy has been updated to include allotments, "The change of use of a rural shop, public house, doctor's surgery, dental surgery, school, bank, church/chapel, village hall, allotments or other facility considered important to the community will only be permitted where it can be demonstrated that:".

0704 Comment Policy **48**

150/22 Mr Ian Yates

Detail The relevant Parish Council should be consulted as a matter of routine, to determine whether or not the criteria set down have been met. Regarding point 2 of this policy, how wide or narrow is the "locality" for the purposes of this policy. I think Parish Councils are best places to advise and guide the LPA on this matter.

Response Parish Councils are currently consulted on this type of development and this will continue within the new Plan. How we define 'locality' is different across the District. In general it is where there is an identifiable local population that a service or facility serves however it is recognised that in more sparsely populated rural areas this may be more difficult to define.

Proposed Change What is considered to be the 'locality' has been defined within the Policy Justification.

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

1032 Objection Policy **48**

194 Michael Barry Cumbria County Council

Detail Appropriate rural services are very important in ensuring the sustainability and vitality of communities, allowing local people to access services without use of a private car. This policy, which seeks to protect important local services and facilities, is considered appropriate in principle. However the second criteria of this policy may conflict with the "presumption in favour of sustainable development". This point is raised because if a facility is not viable, its continued protection will achieve little. This possible conflict in the policy needs to be considered further.

Suggested Changes:

The second criteria of this policy should be subject to further consideration because at present it appears contradictory to the principle of the presumption in favour of sustainable development.

Response Comments are noted however it is the propose of this Policy to protect and sustain rural services and facilities. It is not intended to force unviable services to remain open however it is important that their change of use is reasoned and justified by the provision of evidence of marketing. Paragraph 8.19 of the Justification expands on this as follows "It is not always possible to prevent closure of shops, etc when it is uneconomic for their use to continue. Therefore, proposals involving the loss of local services will only be permitted where the Council is satisfied that the existing use is no longer viable and there is no market for the business as a going concern after proof of advertising it as such for a period no less than six months. Evidence should include for example, a record of numbers of enquiries to take over the business, evidence of viability and proof that the property has been adequately marketed in trade papers and advertisement boards".

Proposed Change There is no proposed change to the Policy in response to this comment.

0850 Support Policy **48**

171/46 Mr Jonathan Fowler Clerk to Walton Parish Council

Detail The policy is clear - sustaining rural facilities and services. How will it be rigorously enforced to ensure that people do not abuse the changes of use for a village shop or Public House?

Response Comments are noted. Where unauthorised change of use of a rural facility or service has taken place, enforcement action will be taken.

Proposed Change There is no proposed change to the Policy in response to this comment.

0019 Support Policy **48**

180 - 181

010 Richard Ritson Chair of Kingwater Parish Council

Detail We would support the provision of rural facilities and services.

Response Comment noted. It is the intention of this policy to support and protect the provision of rural services and facilities.

Proposed Change There is no proposed change to the Policy in response to this comment.

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

0380	Objection	Policy 48	8.1	175
089	Elizabeth Allnutt	National Allotments Society		
Detail	Allotments are not included in the list of the issues which, through the Local Plan, new development takes account of.			
Response	Comments are noted. Allotments will be mentioned within the Policy.			
Proposed Change	The Policy has been updated to include allotments, "The change of use of a rural shop, public house, doctor's surgery, dental surgery, school, bank, church/chapel, village hall, allotments or other facility considered important to the community will only be permitted where it can be demonstrated that:".			

1033	Support	Policy 49		
194	Michael Barry	Cumbria County Council		
Detail	This policy, which seeks to ensure those with mobility challenges can easily access buildings is supported.			
Response	Comments are noted.			
Proposed Change	There is no proposed change to the Policy in response to this comment.			

1034	Objection	Policy 50		
194	Michael Barry	Cumbria County Council		
Detail	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. Nevertheless, it is considered that criteria 4, which seeks to restrict escape routes, should not be at the expense of providing appropriate levels of permeability and accessibility. Suggested changes Remove reference to 'or a choice of escape routes' from paragraph 4 and replace with 'or an excess of routes that could aid escape'.			
Response	Comments are noted.			
Proposed Change	This Policy has been amended accordingly.			

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

0210 Objection Policy 50

071 Andrew Hunton Cumbria Constabulary Community

Detail

The wording of this Policy demonstrates the emphasis the Council places on the creation of safe and secure environments. However, several aspects have changed since consultation took place earlier this year and I therefore request the following amendments:

Item 7. Should now read: 'Developers should indicate what physical security measures have been incorporated into the design to resist crime (for example, the specification of doors and windows compliant with PAS 24:2012, provision of an intruder alarm system, or provision of a separate fused electrical spur to permit future installation of a system, etc):'

'Developers should, at the earliest stage possible, consult the Police Crime Prevention Design Advisor for advice on measures to be incorporated for designing out crime. Advice will be given based on current crime trends or particular crime risk, in accordance with Secured by Design principles. Carlisle City Council encourages applicants to apply to Cumbria Constabulary for the Secured by Design and/or the ParkMark Safer Parking Award(s), where appropriate.'

'All Design and Access Statements should detail how crime prevention measures have been considered.'

Since June 2013, the requirements for the submission of a Design and Access Statement to accompany a Planning Application have changed. Developers are therefore required to provide sufficient information to demonstrate compliance with Policy 50.

Response Comments are noted and welcomed.

Proposed Change This Policy has been amended accordingly.

0337 Comment Policy 51

083 The Coal Authority

Detail Test of Soundness - Meets: Effective

The Coal Authority is pleased to note that Policy 51, amongst other potential development constraints, hints at the risk-based approach to Development Management that operates in coalfield areas by noting The Coal Authority as a consultee in "safeguarding zones" and directs plan users to the risk map included as part of Appendix 3. Whilst Policy 51 makes plan users aware that The Coal Authority will be consulted on certain planning applications, it does not explain what the submission requirements are for planning applications in the defined high risk area. The Coal Authority therefore considers that Policy 51 would be more effective with the inclusion of an additional paragraph in the Justification, which summarises the requirements of the risk-based approach to Development Management in coalfield areas, as follows:

"The Coal Authority has defined high risk areas, where the legacy of past coal mining activity poses a potential risk to land stability and new development. Most planning applications for non-householder development within the high risk areas will need to be accompanied by a Coal Mining Risk Assessment, prepared by a competent person. The spatial extent of these high risk areas is illustrated in Appendix 3." Reason – In order to ensure that due consideration is afforded to the potential risks to new development from unstable land in areas affected by past coal mining activities.

Response Comments are welcomed and noted.

Proposed Change This Policy has been amended accordingly with the additional paragraph added to the Justification.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0041	Comment	Policy 51	188	
020		Essar Oil (UK) Ltd	A005	
Detail	We welcome & support Policy 51. However it should include reference to the Essar Oil (UK) Major Accident Hazard pipeline which passes north - south through Carlisle District and has to be taken into account during the consideration of site allocations and planning applications. The route of the pipeline could be shown in the plan and added to Appendix 3 and Essar Oil (UK) consulted accordingly as an early stage. Including the pipeline in Appendix 3 would ensure that any development viability of allocated sites is not threatened in accordance with the NPPF. Other authorities have found it useful to show the pipeline on a Proposals Map or Constraints Map for ease of reference. Copies of the route on CD as shape files can be provided.			
Response	Comments are welcomed and noted.			
Proposed Change	Reference has been made within the Policy to the Essar Oil (UK) Major Accident Hazard Pipeline and the map highlighting the route of the pipeline has been added to Appendix 3.			
1035	Support	Policy 52		
194	Michael Barry	Cumbria County Council		
Detail	This policy, which seeks to minimise environmental pollution from development, is supported.			
Response	Comment is noted.			
Proposed Change	There is no proposed change to the Policy in response to this comment.			
0218	Objection	Policy 52		
072	Miss Alice Unsworth	NFU		
Detail	Agriculture already falls under the IPPC to prevent pollution so the NFU would not wish to see any further actions that would impede and restrict sustainable agricultural development.			
Response	Comments are noted. It is not considered that this policy would place restrictions on sustainable agricultural development, it will instead be used to assess applications for development which may have an effect on pollution within the District.			
Proposed Change	There is no proposed change in response to this comment.			

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

0721	Comment	Policy	52	
151/23	Mr Bob Sharples	Sport England		
Detail	Sport England is concerned over the negative wording of paragraph 8.53 in relation to floodlighting of sports pitches. A lot of the research done on floodlight was around old style floodlights. 'Floodlighting' technology has moved on considerably over the last 2 decades and therefore we would advise that applications involving floodlights should have robust lighting report and strategies as part of any submission for planning permission and that the applications then assessed by suitably qualified lighting engineer who are up to date with lighting technology.			
Response	Comments are noted and the Policy Justification has been updated to reference lighting reports and strategies to be submitted with Planning Applications.			
Proposed Change	Applications involving floodlights for sports pitches should be accompanied by a robust lighting report and strategies as part of their submission for planning permission.			

0409	Objection	Policy	52	190
095	Jenny Hope	United Utilities		
Detail	United Utilities seeks the addition of the following text within this Policy: Proposals for sensitive uses (such as residential development) should be located away from existing sources of pollution. New development schemes must demonstrate they are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents/ users. New development should be located an acceptable distance away from existing operational businesses with the potential for noise, odour or traffic generation.			
Response	Comments are noted. The suggested paragraph will be added to the Policy Justification.			
Proposed Change	The suggested paragraph has been added to the Policy Justification.			

0463	Support	Policy	52	8.53	192
102	Dr Kate Willshaw	Friends of the Lake District			
Detail	Friends of the Lake District welcomes the policy on pollution which includes light pollution; and also the accompanying paragraph giving more detail.				
Response	Comments are noted.				
Proposed Change	There is no proposed change to the Policy in response to this comment.				

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

0312 Objection Policy **53**

078 Mr Trevor Wilson

Detail There is no mention of fracking anywhere in this document. Include a No Fracking statement. Add to the policy a statement that there shall be no fracking.

Response Fracking is outside of the remit of this Plan. In relation to Minerals and Waste within Cumbria, this is the responsibility of Cumbria County Council.

Proposed Change There is no proposed change to the Policy in response to this comment.

0965 Objection Policy **55**

005 Paul Barton Clerk to Dalston Parish Council

Detail This may be too restrictive.

Response It is considered that it is important that development of contaminated land is given full consideration as certain types of development can be particularly sensitive to land contamination e.g. Housing where contaminated land could have an adverse effect on human health. This Policy allows full consideration to be given to the potential for land contamination whilst encouraging remediation and development of this Brownfield land.

Proposed Change There is no proposed change to the Policy in response to this comment.

0382 Comment Policy **55**

089 Elizabeth Allnutt National Allotments Society

Detail good to see allotments specifically stated here as land sensitive to contamination. Community growing projects and/or farming/agriculture should probably also be included.

Response Comments are noted. The justification will be updated to mention community growing projects and farming/agriculture as uses sensitive to land contamination.

Proposed Change The Policy justification has been amended to state "Certain types of development are particularly sensitive to land contamination e.g. Housing, schools, hospitals, allotments, community growing projects, farming/agriculture and children's play areas".

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

REPRESENTATIONS

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

Chapter 09

0780 Support Policy

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Comment of support noted.

Proposed Change There is no proposed change in response to this comment of support.

0514 Objection Policy

104 Emily Hrycan English Heritage North West

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

The section title should be amended to "Historic environment" to reflect the wording within the NPPF.

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.

Suggest: 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.

We support this objective, which specifically deals with the historic environment.

The objective should be amended to refer to the "historic environment".

Consultation so far: Although what is stated here is generally very positive, as far as Hadrian's Wall goes, the situation with tourism is much more complex than is hinted at here. Tourism within the Wall area must be kept within a sustainable level, as if it increases beyond this there are some impacts that cannot be mitigated or otherwise addressed through management actions.

Response Agree to amend section title to Historic Environment as per comment.

Proposed Change

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

0281	Objection	Policy	202	
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077	Mr Alan Hubbard	National Trust		
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Detail
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."
The Objective for heritage should similarly be 'purely' stated given its key role in the delivering of sustainable development.

Amend to read as follows:

"Heritage – 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."

Response
Heritage assets are very important to the economy of Carlisle District and it is therefore considered important and necessary to recognise this within the objective for the renamed Historic Environment chapter.

Proposed Change
No change required to objective as a result of this objection.

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

0515 Objection Policy 57

104 Emily Hrycan English Heritage North West

Detail It should be noted that any references to the WHS should be amended to read "Frontiers of the Roman Empire (Hadrian's Wall): World Heritage Site" which is now the official name. Reference to "military zone" should be omitted.

It would be helpful to mention that this WHS is transnational taking in parts of the frontier in Scotland and Germany, with the aspiration that it would be extended to take in more of the FRE in the future.

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. Suggest: 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. Reference should be made to the fact that Carlisle City Council is a partner in

The aim of the policy should be to protect the Outstanding Universal Value of the WHS, rather than the individual factors listed here. The policy should be amended to provide emphasis on "Outstanding Universal Value of the WHS". This would bring the policy into alignment with the policies below it and provide clarity that it is the impact on the OUV that is critical when dealing with unacceptable impacts. Paragraph 1 should be amended to read "unacceptable impact on the Outstanding Universal Value".

Paragraph 4: should be amended to read "New development should not normally be permitted on open land in the Frontier"

Para 9.3: The Plan should be expanded to include a description of the WHS and the importance of it throughout the District as Plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. ALSO - The Plan should be amended to include reference to "archaeological significance" in relation to the designation of the WHS and its OUV.

The Plan should reinforce the need for tourism and any associated economic development to be sustainable.

Para 9.4: Delete the last line of this paragraph as the buffer zone is not 10 miles wither side, it varies enormously.

Para 9.6: The paragraph should be amended to refer to "Roman Frontier" instead of "Wall". The paragraph needs to be expanded to cover non- WHS status elements of the Roman Frontier and that their management should be in accordance with the WHS Management Plan.

Response Plan will be amended to make reference to the full title for Hadrian's Wall World Heritage Site but only at the start of the Plan within the spatial portrait, later references will revert back to Hadrian's Wall WHS as it is more commonly known. The other amendments are noted and the policy will be amended where appropriate - however it should be noted that the policy has been written in conjunction with neighbouring LPA's where the line of the wall is also present to ensure a consistent approach.

Proposed Change Amend Spatial Portrait to make reference to full title - Frontiers of the Roman Empire (Hadrian's Wall):World Heritage Site. Amend para 1 of policy to state unacceptable impact on outstanding universal value.

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

0587 Comment Policy **57**

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail Hadrian's Wall World Heritage Site
 Hadrian's Wall runs through a number of Local Authorities and therefore a consistent policy approach is highly beneficial in order to safeguard this internationally important historic asset. It has been possible, due to the timings of the preparation of the two local plans, to develop a joint policy for Hadrian's Wall.

Response No response required

Proposed Change No change required as a result of this comment

1124 Comment Policy **57**

195 Andrea McCallum Clerk to Stanwix Rural Parish Council

Detail These following statements on impact assessments are welcomed:
 "Proposed developments on the Outstanding Universal Value of the World Heritage Site and particularly on key views both into and out of it: development that would have an adverse impact on Outstanding Universal Value should be refused; and "Proposed development outside the boundaries of the Buffer Zone will be carefully assessed for their impact on the Outstanding Universal Value, and any that would have an adverse effect on it should be refused. "
 However; perhaps this should be expanded to include the more specific statement that no new building or structure greater than a specified height, e.g. 10 metres, (other than communication masts or electricity pylons) should be visible from the Hadrian's Wall Heritage Site, Buffer Zone or the Hadrian's Wall National Trail.

Response The comments are noted, however each case will be considered individually and it is not considered that it would be appropriate to prescribe height of structures etc. The cumulative impact of vertical structures is being considered in a technical document which is currently being prepared, this document takes into account the Cumbria Landscape Toolkit and assesses the cumulative impact of structures in landscape terms. These documents will help inform decisions to determine impacts.

Proposed Change No change required as a result of this objection.

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

1036 Objection Policy **58**

194 Michael Barry Cumbria County Council

Detail Policy 58 proposes to replace four current Local Plan policies: LE6, LE8, LE9, and LE10. Proposed Policy 58 is considered confusing and seems to contain grammatical errors. The title suggests that it only covers scheduled monuments and other sites of national importance, but the second paragraph refers to all archaeological sites. It is suggested that, in order to bring the proposed policy into line with guidance in the NPPF, the key elements regarding; archaeological remains, impacts on designated heritage assets, impact on non-designated heritage assets, mitigation, and the requirement to provide sufficient evidence to determine the impact of development proposals, are more clearly referred to in the policy.

To address this, a revised policy is proposed below [the relevant guidance in NPPF is shown in brackets (not for inclusion in final policy)]:

“Development will not be permitted where it will have an unacceptable impact on Scheduled Monuments, or other nationally important non-designated assets of archaeological interest, and their settings (NPPF para. 139).

Any proposals that affect non-designated assets of archaeological interest will be judged on the significance of the assets and the scale of the harm (NPPF para. 135). Any assets of archaeological interest, whether designated or not, that are harmed by a proposal will need to be recorded by the developer to a level that is proportionate to their significance and to the scale of impact of the proposal (NPPF para. 141). The information will need to be made publicly accessible in the County's Historic Environment Record (NPPF para. 141).

Proposals that will have an impact on any assets of archaeological interest, whether designated or not, or will have an impact on an area where there are reasonable grounds for the potential of unknown assets of archaeological interest to be, should be accompanied by an assessment of the significance of the asset and how that significance will be affected by the proposed development. The level of information required will be proportionate to the asset's significance and to the scale of impact of the proposal, and may require, where necessary, archaeological desk-based assessment and field evaluation. (NPPF para. 128)”

Response Agree to amend policy to improve clarity, amendments have been taken on board alongside comments for other objectors.

Proposed Change Amend policy to read: Development will not be permitted where it would have an unacceptable harm to the significance of a scheduled Monument, or other nationally important non designated site or assets of archaeological interest or their setting.

Proposals that affect non designated 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. The Council will seek to ensure mitigation of damage through the preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording of assets by the developer to a level that is proportionate to their significance and to the scale of the impact of the proposal. The information will need to be made publicly accessible in the County's Historic Environment Record.

Proposals that will have an impact on an area where there are reasonable grounds for the potential of unknown assets of archaeological interest to be, should be accompanied by an assessment of the significance of the asset and how that significance will be affected by the proposed development. The level of information required will be proportionate to the assets significance and to the scale of impact of the proposal, and may require, where necessary, archaeological desk-based assessment and field evaluation.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0293	Objection	Policy	58	
077	Mr Alan Hubbard	National Trust		
Detail	<p>The Policy is welcomed and generally supported. However, it is suggested that the specific wording relating to settings requires adjustment so as to be clear that proposals that adversely affect the heritage asset or its setting, not necessarily both, would be unacceptable.</p> <p>Amend first sentence of the Policy to read as follows: “Development will not be permitted where it will have an unacceptable impact on scheduled and other nationally important ancient monuments or their settings.”</p>			
Response Proposed Change	<p>Agree that wording should be amended, changes made in line with this objection and other received in respect of this policy.</p> <p>Amend first paragraph of policy to read: Development will not be permitted where it would have an unacceptable harm to the significance of a scheduled Monument, or other nationally important non designated site or assets of archaeological interest or their setting.</p>			
0516	Objection	Policy	58	205
104	Emily Hrycan	English Heritage North West		
Detail	<p>To be in line with the NPPF - It is recommended that the policy be rewritten to include the following: “Development which would result in harm to the significance of a Scheduled Monument or other nationally important archaeological site will not be permitted. The preservation of other archaeological sites will be an important consideration when development affecting such sites is acceptable in principle. The Council will seek to ensure mitigation of damage through the preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development”.</p> <p>Re Justification : The Plan needs to be amended to reflect the broader process of assessment and evaluation of archaeological remains of a range of significances rather than concentrating exclusively on the issue of nationally significant nondesignated archaeology.</p>			
Response Proposed Change	<p>Agree to amend wording in line with this objections and others received in respect of this policy.</p> <p>Amend policy to read: Development will not be permitted where it would have an unacceptable harm to the significance of a scheduled Monument, or other nationally important non designated site or assets of archaeological interest or their setting.</p> <p>Proposals that affect non designated 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. The Council will seek to ensure mitigation of damage through the preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording of assets by the developer to a level that is proportionate to their significance and to the scale of the impact of the proposal. The information will need to be made publicly accessible in the County’s Historic Environment Record.</p> <p>Proposals that will have an impact on an area where there are reasonable grounds for the potential of unknown assets of archaeological interest to be, should be accompanied by an assessment of the significance of the asset and how that significance will be affected by the proposed development. The level of information required will be proportionate to the assets significance and to the scale of impact of the proposal, and may require, where necessary, archaeological desk-based assessment and field evaluation.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0900	Support	Policy	59	
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	Support			
Response	support noted			
Proposed Change	No change required			
0371	Objection	Policy	59	
088	Elizabeth Allnutt	Save Our Streets		
Detail	This Policy will only be relevant if the Local Listings are maintained and added to as described in 9.21. The Local Listing is unclear. The list on the City Council's website does not specify whether this is a Local Listing deriving from the City Council or a National Listing derived from English Heritage. This needs to be clarified and the list which has been omitted needs to be added.			
	If the list on the Council's website refers to the Local Listings then there are buildings of local significance which have been left out. The Old Fire Station/Police Station/Magistrate's Court and houses in Warwick St, the terraces of Corporation Road and Peter St and the Civic Centre are all worthy of Local Listing but do not appear			
Response	Agree that the policy has to be effectively implemented in order to ensure it works as intended - however its inclusion within the Local Plan will help ensure that the Local List is not overlooked and due consideration is given to these locally important buildings providing one element, of a wider strategy as set out in other policies within the Plan and associated document/management plans, to effectively manage Carlisle District's heritage assets. The policy will include additional wording to ensure a distinction from English Heritages register of Listed Buildings which are deemed to be of national significance. The Council's website does not currently include details of buildings on the Local List - however this will be added in due course.			
Proposed Change	Amend para 9.19 to read: Within the City and in other locations there can be pressure for redevelopment potentially resulting in the loss of unlisted structures that whilst not of national importance, (and therefore not eligible for inclusion on English Heritage's register of Listed Buildings) may be of local heritage or townscape significance.			
1037	Support	Policy	59	
194	Michael Barry	Cumbria County Council		
Detail	Locally listed buildings are important to the character of Carlisle. The establishment of a policy that sets out how development at, or close to these buildings is therefore considered important.			
Response	Support noted			
Proposed Change	No change required			

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

0517	Objection	Policy	59	207
104	Emily Hrycan	English Heritage North West		
Detail	<p>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. The policy itself does not provide any certainty about how planning proposals will be determined nor what will or will not be permitted which is required in the NPPF. The Policy needs to include a clear statement of the approach and requirement for proposals that affect this asset type.</p> <p>Changes: The title should be amended to read "Locally important heritage assets". It is recommended that the policy be amended to include the following: "Development which would remove, harm or undermine the significance of a locally-important heritage asset, or its contribution to the character of the area will only be permitted where the public benefits of the development would outweigh the harm".</p>			
Response	<p>The intention of the Local Listings policy is to make a distinction and afford greater protection to those buildings/structures that are considered to be significant local importance to warrant their inclusion on the List. By broadening the scope of the policy to incorporate all local heritage assets it would result in 'watering down' the value of the Local List therefore reducing the policies effectiveness and purpose.</p>			
Proposed Change	<p>No change required as a result of this objection.</p>			

0901	Support	Policy	60	
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	<p>Although Brampton PC supports this policy we are anxious that the planning department does not adhere to the requirements within the policy. Recent actions on planning approvals within Brampton's conservation area go directly against this policy.</p>			
Response	<p>Support noted</p>			
Proposed Change	<p>No change required</p>			

0804	Support	Policy	60	
158/33	Mrs Julie Templeton			
Detail	<p>I support this policy</p>			
Response	<p>Support noted</p>			
Proposed Change	<p>No change required as a result of this support.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0565	Objection	Policy	60	
121	Mike Fox	Brampton Economic Partnership		
Detail	There is an absence of considerations of conservation matters for the centre of Brampton. [Comment supported by Burtholme Parish Council]			
Response	The suite of conservation policies are applicable to all areas and structures of heritage significance therefore are relevant to heritage matters in Brampton. In addition to the Local Plan and the reference it makes to heritage matters there is Brampton Conservation Area appraisal which provides a greater level of detail - this should not be replicated within the Local Plan.			
Proposed Change	No change required in response to this objection.			
0372	Objection	Policy	60	
088	Elizabeth Allnutt	Save Our Streets		
Detail	The second paragraph refers to townscape improvement areas located on the proposals map. There appears to be no indication of where these are on the map. Clarification around the Local v National Listings would again be helpful. The principle of maintaining buildings in conservation areas and not allowing them to slip into decay should also be addressed. This protects the buildings themselves but will also prevent eyesores developing in conservation areas. 9.26 An indication of when the management plan for the conservation area containing Rickergate will be available would be helpful. SOS would support this Policy.			
Response	The townscape improvement areas fall within the area covered by the City Centre Masterplan and therefore were not detailed in the preferred options version of the Plan - this detail will however be available for the next consultation. Local Listings policy will include additional text to ensure distinction between Listed Buildings and Local Listings. The policy is intended to guide development in conservation areas to ensure that works do not degrade its character, unfortunately the policy cannot control whether or not a building decays but provides guidance as to appropriate works.			
Proposed Change	No change proposed as a result of this objection.			
1038	Comment	Policy	60	
194	Michael Barry	Cumbria County Council		
Detail	The establishment of a policy that sets out how development in Conservation Areas is considered is important. While this policy is supported broadly, it is considered that criteria 6 would benefit from amendment to allow suitable flexibility in otherwise it may prejudice appropriate development, such as community infrastructure. Suggested changes: - It is suggested criteria 6 is revised to state: "Proposals which would generate a significant increase in traffic movements and heavy vehicles or excessive parking demands will not be permitted where these would be prejudicial to the character of the conservation area".			
Response	Agree to amend policy in line with suggestion.			
Proposed Change	Criterion amended to read: 6.☐Proposals which would generate a significant increase in traffic movements and heavy vehicles or excessive parking demands will not be permitted where these would be prejudicial to the character of the conservation area;			

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

0518	Objection	Policy	60	209
104	Emily Hrycan	English Heritage North West		

Detail

Any proposals affecting conservation areas are expected to preserve or enhance elements that make a positive contribution to their special character or appearance and have been identified in the respective conservation area appraisal. Reference to this should be included within this policy.

The evidence base accompanying the Local Plan fails to make reference to the historic environment including any conservation area appraisals. It is expected that all conservation areas should have an up to date appraisal and management plan. Without this, it would be difficult to assess the significance of the area and to determine its special qualities, which would inform this policy.

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.

The Plan should be amended to include the following:

- "Proposals affecting conservation areas should preserve or enhance those elements that have been identified within the respective conservation area appraisal as making a positive contribution to their special character and appearance.
- Demolition or other substantial loss to the significance of a building or feature that contributes positively to the conservation area will be permitted only where this harm is outweighed by the public benefits of the proposal.
- Development which would result in harm to a public or private open space that contributes positively to the character of a conservation area will be permitted only where this harm is outweighed by the public benefits of the proposals."

Response Agree to amend policy in line with suggestions.

Proposed Change Amend policy to read: Proposals for new development and/or alterations to buildings in conservation areas will be judged against the following criteria:

1. The development should preserve or enhance all features which contribute positively to the area's character or appearance, in particular the design, massing and height of the building should closely relate to adjacent buildings and should not have an unacceptable impact on the townscape or landscape;
2. The development should not have an unacceptable impact on the historic street patterns/boundaries, roofscape, skyline and setting of the conservation area, important open spaces or significant views into, out of and within the area;
3. Development proposals should not result in demolition and redevelopment behind retained facades;
4. Wherever practicable traditional local materials or materials of similar appearance such as brick, stone and slate should be used and incongruous materials avoided;
5. Individual features both on buildings and contributing to their setting, should be retained e.g. doorways, windows, shopfronts, garden walls, railings, cobbled or flagged forecourts, sandstone kerbs, trees and hedges etc. Where features have deteriorated to the extent to which they have to be replaced, the replacement should match the original;
6. Proposals which would generate a significant increase in traffic movements and heavy vehicles or excessive parking demands will not be permitted where these would be prejudicial to the character of the conservation area;
7. Proposals which would require substantial car parking and servicing areas which can not be provided without an adverse effect on the site and its surroundings will not be permitted.

Applications for outline planning permission will not be acceptable for proposals in conservation areas.

Demolition

There will be a general presumption in favour of the retention of buildings which make a positive contribution to the character/appearance of a conservation area. Demolition or other substantial loss to the significance of a building or feature that contributes positively to the conservation area will be permitted only where the harm is outweighed by the public benefits of the proposal. Applications for planning permission/conservation area consent for development proposals that would require the total

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

demolition of unlisted buildings in conservation areas, must be accompanied by details of redevelopment and will be assessed against the following criteria:

1. the contribution of the building to the landscape/ streetscape;
2. the structural condition of the building;
3. the suitability of the building for an alternative viable use;
4. the contribution which the demolition /redevelopment would make to broader conservation objectives;
5. the inclusion of the building on the local list.

Proposals to utilise vacant land for car parking for interim or longer term use within conservation areas, will be resisted except in exceptional circumstances.

Development which would result in harm to a public or private open space that contributes positively to the character of a conservation area will be permitted only where this harm is outweighed by the public benefits of the proposals.

0294 Support Policy 61

077 Mr Alan Hubbard National Trust

Detail It is important, especially having regard to the nature, quality and extent of Carlisle's listed buildings, to have a specific and detailed policy on these assets. The approach set out is endorsed.

Response Support noted- however it is proposed to split the policy into three separate policies - Listed Buildings, Historic Parks and Gardens, Battlefields.

Proposed Change No change required as a result of this support.

1039 Support Policy 61

194 Michael Barry Cumbria County Council

Detail These areas are all important to the historic character and visitor economy of Carlisle. The establishment of a policy that seeks to protect the character of these is therefore considered important.

Response support noted

Proposed Change No change required

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

0519	Objection	Policy 61	212	
104	Emily Hrycan	English Heritage North West		

Detail
This policy should be separated into individual policies to cover the different types of assets like it has been done for conservation areas, archaeology and locally important buildings. The NPPF requires that there is a clear explanation of the considerations and approach to development proposals affecting each of the different assets types and how they should be determined. The three asset types that have been grouped together here would be dealt with differently – for example historic battlefields are considered to be of the highest significance and therefore would be dealt with slightly different.

RE Justification: The Plan needs to be amended to reflect the broader process of assessment and evaluation of individual assets. The Plan itself needs to be expanded to detail the historic environment in the District and justifications would benefit from making reference to specific elements of this.

Suggested Changes: Listed Buildings

>Listed buildings and their settings will be preserved and, where appropriate enhanced. Loss of any significance should be minimised and will be permitted only where any harm is justified by the public benefits of the proposal.

>The total or substantial demolition of a listed building will be permitted only in exceptional circumstances.

Historic Parks and Gardens

>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.

Historic Battlefields

Proposals affecting the site or setting of a Registered Historic Battlefield, will only be permitted where it would not adversely affect the historic, archaeological or landscape interest of the site and not prejudice any potential for its interpretation.

Response Agree to splitting the policy to allow the assets to be appropriately and effectively assessed.

Proposed Change Agree to split the policy into 3 new separate policies covering the different historic assets: Listed Buildings; Historic Parks and Gardens; Historic Battlefields.

RepNo	Status	Paragraph	Page	Map
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Consultee Ref No	Consultees.Contact	Organisation	Agent
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REPRESENTATIONS

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

Chapter 10

0348 Comment Policy

087 David Hammond Natural England

Detail The Council should also seek to strengthen its Green Infrastructure Policies, identifying areas of deprivation and improvement, seek to link green spaces, alleviate fragmentation and enhance where possible green/open space provision. This will help reduce potential for impact on designated sites and help strengthen the Council's policies.

Response Noted and agreed. Policy S4 already seeks to link green spaces and create joined up and enhanced networks, but it is accepted that more can be done to make it more strategic and spatial. The policy will be improved, with help from the Environment Agency to be able to more aptly target areas of deprivation and in need of improvement.

Proposed Change Work with EA to provide a more spatial dimension to the Green Infrastructure policy.

0781 Support Policy

156/29-31 Mr Viv Dodd Cumbria Business for Business

Detail Support

Response Noted.

Proposed Change N/A

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

0383 Objection Policy

089 Elizabeth Allnutt National Allotments Society

Detail A separate Policy within this chapter, dedicated solely to Allotments, would be appropriate and welcome. Reasons for this are rehearsed in the introductory comments. 10.35 and 10.36 These clauses do not fully address how developers will contribute to open space requirements – including allotments. This must be clarified. Provision of new allotment sites is long overdue and there should be clarity around long-term planning and how these are likely to be achieved.

Suggest: Inclusion of a separate Policy dealing with allotments. Or failing this a further clause is added in 10.31 to the effect: 'statutory obligations have been fulfilled if it is proposed to dispose of statutory allotment land.'

Response A separate policy on allotments is not considered to be required, it would not say anything different, in terms of protection or enhancement than the proposed open space policy (which covers all types of open spaces, including allotments.) The suggested amendment to the policy will be included however.

Proposed Change Amend Open Space policy to include requirement for 'statutory obligations have been fulfilled if it is proposed to dispose of statutory allotment land.'

0282 Objection Policy

077 Mr Alan Hubbard National Trust

Detail A different approach is taken in green infrastructure (and heritage) 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." The Objective for heritage should similarly be 'purely' stated given its key role in the delivering of sustainable development.

Amend to read as follows:

"Green Infrastructure – To enhance and improve the quality of the green and blue infrastructure of the District whilst protecting biodiversity and sensitive landscapes for the benefit of Carlisle's citizens and tourists"

Response Noted and agreed. The objective can be updated, though these caveats must remain in policy to ensure the plan is in line with the NPPF.

Proposed Change The Green Infrastructure objective will be updated to delete reference to economic development.

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

0464	Objection	Policy	215	
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District consider that the Objective text should be amended and that the reference to not compromising opportunities for future development should be removed. The weight giving to prioritising economic development is so explicit in the rest of the plan and in the NPPF that it surely doesn't have to be repeated here.			
	Suggest: Reword along the lines of: Objective - To protect, enhance and improve the provision of the green and blue infrastructure of the District for the benefit of the people of Carlisle, visitors and the wider natural environment by protecting and enhancing biodiversity, ecosystem services and sensitive landscapes.			
Response	Agreed. Reference to not compromising opportunities for future development will be deleted within the green infrastructure objective.			
Proposed Change	Delete reference to opportunities for future development from the green infrastructure objective.			

0892	Objection	Policy	215	
187	Ken Hind	Clerk to Kingmoor Parish Council		
Detail	Story Homes won the planning on code 4 although they were allowed to change to a code 3. Why was this if we are quoted 10-1 The Big Green City.			
Response	Issues regarding individual applications should be discussed with the Development Management team/the relevant case officer.			
Proposed Change	No change			

0295	Support	Policy	62	
077	Mr Alan Hubbard	National Trust		
Detail	The detailed advice and requirements set out in the Policy and its supporting text are considered to be relevant to the character of the District and appropriate – they are supported.			
Response	Support acknowledged			
Proposed Change	N/A			

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

1040 Comment Policy **62**

194 Michael Barry Cumbria County Council

Detail General Comments submitted along with comments relating to Carlisle, Brampton and elsewhere.

Response Noted

Proposed Change N/A

0465 Support Policy **62**

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District supports the Landscape policy. We are pleased to see references to the Cumbria Landscape Character Toolkit and to light pollution prevention measures.

Response Support Acknowledged

Proposed Change N/A

1041 Comment Policy **63**

194 Michael Barry Cumbria County Council

Detail The NPPF Core Principles include the need for local planning authorities to take into account the roles and character of different areas, and to recognise the intrinsic beauty of the countryside and the importance of supporting thriving rural communities within it. NPPF Paragraph 109 outlines guidance in regard to conserving and enhancing the natural environment, which includes the need for the planning system to contribute to the protection and enhancement of valued landscapes. It is considered that Policy 63 respects these important considerations and is therefore appropriate.

Response Support noted

Proposed Change No change.

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

0585 Comment Policy **63**

125 Chris Woodley-Stewart North Pennines AONB Partnership

Detail I know you are trying to suit two AONBs here, but I hope you add a little bit for ours. My suggested reworking of the policy is below. Firstly, here's your current wording:
 Carlisle Policy
 Within the Solway Coast and North Pennines Areas of Outstanding Natural Beauty (AONB) the protection of the natural beauty and historic integrity of the landscape will be afforded the highest priority. Only development that is locally sensitive and of high quality design or which actively seeks to enhance or protect landscape character or is otherwise of high national importance will be permitted within these national designations.

I don't think the above is comprehensive enough really. I recommend the following, based on the County Durham Plan policy which we influenced, amended to suit your needs:

Areas of Outstanding Natural Beauty

The North Pennines and the Solway Coast Areas of Outstanding Natural Beauty (AONB) will be conserved and enhanced. Development in or affecting the AONBs will only be permitted where it does not, individually or cumulatively, have a significant adverse impact on their special qualities or statutory purposes.

Major developments will only be permitted in the AONBs in exceptional circumstances where it can be clearly demonstrated to be in the public interest and where the following have been fully considered:

- a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- c) Any detrimental effect on the environment, the landscape, and recreational opportunities, and the extent to which that could be moderated.

Development will be expected to be designed and managed to the highest environmental standards and be in accordance with the objectives of the AONB Management Plans. In the North Pennines, development will be expected to accord with the guidance provided in the North Pennines AONB Planning Guidelines and the North Pennines AONB Building Design Guide.

I hope this helps. It may also be worth noting in the text that the principle in favour of sustainable development doesn't apply in AONBs.

Response Noted and agreed.

Proposed Change Wording to be updated as suggested. Reference to how the presumption in favour of sustainable development does not apply within the AONB in supporting text.

0466 Support Policy **63**

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District is pleased to see the support for the two AONBs which lie partly within the District and the commitment to locally sensitive and high quality design in these designated areas.

Response Support noted.

Proposed Change No change.

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

0586 Comment Policy **63**

126 Mr Kevin Kerrigan Allerdale Borough Council

Detail The Solway Coast AONB is jointly managed by an AONB partnership between Allerdale, Carlisle, Natural England, the Environment Agency and various community organisations. A Management Plan has been agreed between all these organisations. The outcome of co-operation between Allerdale and Carlisle is that both Local Plans have developed a joint policy approach to the AONB.

Response Noted. The Council will continue to co-operate with Allerdale to ensure that a joint policy approach is achieved, ensuring that the unique landscape qualities of the AONB are protected, conserved and enhanced.

Proposed Change None.

0296 Support Policy **64**

077 Mr Alan Hubbard National Trust

Detail National Trust welcomes the inclusion of this Policy and has no particular observations to make upon the detailed wording at this stage.

Response Support acknowledged

Proposed Change N/A

1042 Objection Policy **64**

194 Michael Barry Cumbria County Council

Detail Policy 64 gives important advice about the consideration of development proposals which may affect biodiversity and geodiversity. This recognition is welcome and the principle of the proposed policy does appear appropriate. However it is felt that it could be further improved by highlighting the need for species surveys undertaken before an application is determined.

Suggested Changes:

This policy could make reference to the important of species surveys being provided prior the determination of applications.

Response Agreed

Proposed Change Mention species surveys in policy.

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

0467 Objection Policy **64**

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District considers that this is a good and comprehensive policy which will help to protect the biodiversity and geodiversity of the District whilst still enabling development. However, the policy needs the addition of another heading regarding Provision of Biodiversity and Geodiversity Information. Ideally this should sit between the Locally Designated Sites and Development Affecting Biodiversity and Geodiversity headings. The District needs to ensure that adequate information on the biodiversity and geodiversity of a proposed development site is provided by developers; it is the responsibility of a developer to provide this information when submitting a planning application. A useful guide to why surveys of development sites are needed and what information should be gathered to inform a planning application can be found here: http://www.thomsonecology.com/publications_teh_ecological-surveys Many local authorities set out guidance in their local plan or in an associated SPD on what is expected with regards to ecological survey of an application site.

Suggest: Provision of Biodiversity and Geodiversity Information

Developers should be encouraged to access data from the Cumbria Biological Data Centre (CBDC) to inform their planning application. Species and habitats surveys should be provided where necessary, whether informed by a CBDC data search or by an initial assessment of the site to be of wildlife value. Species and habitats surveys should be carried out at the correct time of year.

Response Agreed.

Proposed Change Text to be updated as suggested.

0468 Support Policy **65**

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District strongly supports the Open Space policy as it will ensure that the people of Carlisle are able to easily access open space; and that developers will be required to provide informal recreation space within larger developments.

Response Support acknowledged.

Proposed Change N/A

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

0115 Objection Policy 65

051 Story Homes Ltd A010

Detail There is no indication of what land will be required for different sizes of development. Policy S4 states "wherever possible new development will be expected, either on site or through contributions to asset elsewhere". Development contributions should mitigate their own impacts only in order to make the development acceptable in planning terms and be fairly and reasonably related in scale. It is not appropriate for developments to address existing deficiencies or wider issues. It is important to provide developers with as much certainty as possible in relation to developments in order to promote viability. (same rep as 0114)

Response Disagree - where an existing infrastructure deficit exists that would impact upon the well being and day to day life of the residents/business that will subsequently occupy the development then it is entirely appropriate for developer contributions to address this. A viability assessment is underway to assess the economic impacts of policies in this plan and will be used to ensure that developer contribution requirements do not make developments unviable as well as ensuring that viability can not be used as a tool for developers to shirk their responsibility to the communities they wish to develop in.

Proposed Change No change

0844 Objection Policy 65

170/45 Mr Nick Sandford The Woodland Trust

Detail We are disappointed to see that woodland is not listed as a type of open space to be provided in association with new development. In its publication Woodland Creation Why it Matters (see www.woodlandtrust.org.uk/publications) the Woodland Trust shows that new woodland can provide a range of social, economic and environmental benefits to local people and therefore it is vital that trees and woods are planned into new development as part of a network of green infrastructure. We support the use of access standards to determine how much new open space may be required. The Natural England Access to Natural Greenspace Standard is a good one and we have developed one specifically for woodland. Our standard aspires that everyone should have a wood of at least two hectares within 500 metres of their home and a 20 hectare wood within 4 kilometres. Some councils, for example Leeds and Calderdale, have used the standard to derive woodland creation targets for inclusion in local plans or GI strategies and we are happy to advise on how this may be done. Include trees and woods as part of the open space provided with new development. Consider using the Woodland Trust's Access to Woodland Standard in determining how much new woodland is required and reference this in the policy or in the supporting text.

Response Noted. Woodland can be added to the list of open space types. The adoption of standards will be considered.

Proposed Change Add woodland to the list. Include adoption of woodland standards as an alternative option for debate through consultation.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0566	Objection	Policy	65	
121	Mike Fox	Brampton Economic Partnership		
Detail	<p>Concern regarding the loss of the last publically owned site to housing purposes, on the access to A69 towards Carlisle 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. [Comment supported by Burtholme Parish Council]</p>			
Response	<p>Noted. The protection and enhancement of green infrastructure is of high importance to the Local Plan. The value of GI for tourism, residents, businesses, and the natural environment is recognised and understood, and reflected in policy.</p>			
Proposed Change	<p>No change.</p>			
1134	Comment	Policy	65	
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	<p>Cummersdale requests the designation of the Copse and the Recreation field as Designated Open Space in the Carlisle and District local plan. The current recreation field in Cummersdale has a play area and football pitch which is not the recognised size for a football pitch (2/3) this was identified in the Cummersdale Community Plan . The Council wish to extend the pitch by 50 metres to the North West towards Dalston Road.</p>			
Response	<p>Noted. The recreation field is currently recognised as amenity open space, and as such is protect. However, it is accepted that this does not recognise its use as a football pitch and play area. The amenity open space is to be upgraded to reflect the all-encompassing open space policy in the draft Local Plan 2015-2030. This open space designation would cover open spaces, allotments, amenity open space, play areas, and sports pitches. It will continue to protect these uses.</p>			
Proposed Change	<p>Regarding the proposed extension, whilst the Council would support Cummersdale Parish Council through the open space policy should it wish pursue it, more work would need to be done before this could be recognised in the Local Plan. The parish should open begin discussions with the Carlisle Green Spaces team.</p> <p>Update policy map to reflect open space policy, change amenity/allotments etc to open space designation, also primary leisure areas (excluding uses more relevant to the tourism and culture policy.)</p>			

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

0722 Objection Policy **65**

151/23 Mr Bob Sharples Sport England

Detail Sport England unfortunately currently objects to this policy. We are aware that Carlisle is currently preparing a playing pitch strategy,(10.32), however until it is adopted it is difficult to see how the authority knows if it has enough playing pitches to meet the current demand far less the additional demand which will be generated by the new housing growth. The policy also fails to recognise the need for ancillary facilities such as changing accommodation for playing fields. Also well as the role of Artificial Grass Pitches. These issues may of course be addressed in the playing pitch strategy, but a stronger link between the Local Plan and the strategy is need than what is current contained in the Local Plan.

Adoption of the emerging Playing Pitch strategy and better wording linking it to the Local Plan.

Response In producing the Local Plan the policy team has worked closely with the Green Spaces team and have had access to pre-publication drafts of the sports pitch strategy. The policy has been written to establish the principles of protection of open space and to support the creation of new provision where the need arises, intending for the playing pitch strategy to provide the finer detail in its role as an important part of the evidence base and material consideration within planning decisions. Links to the strategy can be emphasised in policy.

It was hoped that the wording for development that relates to and compliments the existing leisure use would be sufficient to cover ancillary uses. However, it is accepted that this could be made clearer.

Artificial grass pitches would be included under the definition of open space.

Proposed Change Provide stronger links to playing pitch strategy. Include reference to artificial grass pitches. Clarify that ancillary uses are supported.

0966 Objection Policy **65**

005 Paul Barton Clerk to Dalston Parish Council

Detail Area between Dalston Bridge and Peter Lane and the area of land between Kingsway and the river should be protected by a designation of 'Green Space'.

Response Disagree. This would be an inappropriate and excessive use of a green space designation. The NPPF is clear that green space designations should not be used to create what would essentially be a green-belt around settlements where there is no justification to do so. This land is open countryside, and will be shown as 'white-land' i.e. Undesignated land, on the policy map. This will offer suitable protection from unsustainable development.

Proposed Change No change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1043	Objection	Policy	65	
194	Michael Barry	Cumbria County Council		
Detail	<p>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.</p> <p>Suggested Changes: The policy should refer to the potential for SuDS to be incorporated into open space within the development site.</p>			
Response	The role of SUDS in open space has already been addressed within the Green Infrastructure policy.			
Proposed Change	No change.			
0680	Objection	Policy	66	
146/18	Mr Ian Brodie	The Ramblers		
Detail	<p>The Policy recognises the importance of Hadrian's Wall WHS as part of the green infrastructure but fails to give recognition of the English Coastal Route, the delivery of which is Government Policy. The future development of this trail through Carlisle LP area (as with the existing Pennine Way and Cumbria Coastal Way) is an important part of the areas green infrastructure and appropriate protection of the potential route should be made. Any developments which infringe on the route should be examined for potential planning gain which may facilitate the route.</p> <p>The policy should recognise the government policy on the English Coastal Route and offer it appropriate protection.</p>			
Response	Agreed. Reference will be added.			
Proposed Change	Include reference to the English Coastal Route.			
0219	Objection	Policy	66	
072	Miss Alice Unsworth	NFU		
Detail	<p>The NFU would wish to see that the local community and landowners would be consulted when extensions and improvements were planned, with evidence of an established need for them and a clear outline of how and by whom they would be managed.</p>			
Response	Noted. Cumbria County Council is responsible for the detailed planning and establishment of public rights of way. These matters should be considered by them when planning improvements and extensions. This policy serves mainly to ensure that rights of way are considered by an applicant when new development is proposed.			
Proposed Change	No change.			

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

1044 Objection Policy **66**

194 Michael Barry Cumbria County Council

Detail

This policy concerns Public Rights of Way and how they should be considered through the planning process. While the principles expressed in this policy have merit, the policy and / or supporting text need to provide greater context about how proposals requiring variation to a right of way would need to be considered is beyond the scope of the planning system.

The Highway Authority is only responsible if the footpaths are closed/diverted under powers contained in the Highways Act 1980. Paragraph 10.43 is therefore factually incorrect and should either be deleted or amended.

Stopping ups/diversions carried out under Sections 247 and 248 of the Town and Country Planning Act 1990 are the responsibility of the Secretary of State for Transport and stopping ups or diversions of footpaths and bridleways carried out under Section 259 may be authorised by the local planning authority, in all cases the Highway Authority is a consultee in the stopping-up/diversion process.

It should be noted that the grant of planning permission does not entitle developers to obstruct a public right of way. It cannot be assumed that because planning permission has been granted that an order under section 247 or 257 of the 1990 Act, for the diversion or extinguishment of the right of way, will invariably be made or confirmed. Development, in so far as it affects a right of way, should not be started and the right of way should be kept open for public use, unless or until the necessary order has come into effect. As part of the plan, consideration should be given to opportunities to enhance Public Rights of Way throughout Carlisle.

Suggested changes:

- Paragraph 10.43 should be deleted or amended as per the advice above.
- Scope of policy and / or supporting text need to be expanded to incorporate the advice provided above.

Response Noted and agreed. The text will be corrected in line with advice provided.

Proposed Change Amend text in line with advice provided.

1045 Support Policy **67**

194 Michael Barry Cumbria County Council

Detail

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.

Response Support acknowledged

Proposed Change No change

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

0469 Support Policy **67**

102 Dr Kate Willshaw Friends of the Lake District

Detail Friends of the Lake District welcomes the Trees and Hedgerows policy as an important means of maintaining and enhancing these significant landscape features and to ensure that they are successfully incorporated into developments.

Response Support acknowledged

Proposed Change No change

0297 Support Policy **67**

077 Mr Alan Hubbard National Trust

Detail National Trust welcomes the inclusion of this Policy and has no particular observations to make upon the detailed wording at this stage.

Response Support acknowledged

Proposed Change N/A

0842 Support Policy **67**

170/45 Mr Nick Sandford The Woodland Trust

Detail As mentioned earlier, we welcome the strong protection given in the trees policy to ancient woodland and ancient trees. We would prefer to see them given absolute protection but the policy refers to the fact that they are irreplaceable and includes a wording analogous with that in the NPPF. We would like to see the policy set targets for the planting of new trees and creation of new woodland particularly when there is new development.

Response Support acknowledged. Setting targets for tree planting is not something the Council has considered in the Local Plan. This could be included as option to encourage debate through the consultation.

Proposed Change Include setting targets for trees within the alternative options for the policy.

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

0705	Comment	Policy	67	
150/22	Mr Ian Yates			
Detail	Local residents, perhaps through their Parish Councils, ought to be consulted regarding which trees are "... considered important to the local community" etc. They are best placed to provide advice and guidance on such matters.			
Response	Noted. Anybody may request a tree be considered TPO worthy on public amenity grounds.			
Proposed Change	No change.			

0020	Support	Policy	67	231 - 232
010	Richard Ritson			Chair of Kingwater Parish Council
Detail	No comment made			
Response	Support acknowledged			
Proposed Change	N/A			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0375	Objection	Policy	New	
089	Elizabeth Allnutt	National Allotments Society		
Detail	<p>The previous Local Plan (2001-2016) had an entire policy (LC7) dealing with allotments which indicated that permission would be denied to proposals which would result in the loss of allotments, unless the allotments were surplus to requirements and satisfactory alternative provision could be made within the neighbourhood. This separate policy has been omitted from the new draft plan.</p> <p>Several points are raised and:</p> <p>in order to address these issues properly, there should be a separate policy dealing with allotments in Chapter 10 – Green Infrastructure and the deficit of plot provision should be addressed in the Infrastructure Delivery Plan.</p> <p>The place of allotments on the Policy Maps is odd and inconsistent. The following points should be addressed:</p> <ul style="list-style-type: none"> - Some of the City's allotment sites are shown on the Urban Policy map but not all of them. - The rural allotment sites – e.g. Longtown and Brampton and the parish sites which are just emerging, do not appear at all. - When allotment sites do appear on the Urban Policy map they come up as Land Allocated for Primary Leisure Use. This is not consistent with the written draft which deals with Open Space as a whole and does not recognise it wholly as an adjunct of Leisure. This designation for allotments, as Leisure land, is not necessarily a problem but it does not recognise the sites as allotments in their own right, with some statutory protection, nor does it address the wider applications of allotments beyond the purely leisure/recreational ones. - The designation on the Urban Policy map of dedicated allotment land. There is only one area of this in Kingstown. Other neighbourhoods in the District (urban and rural) would also benefit from forward planning and dedicated land for future allotment provision. There is also no text to explain or support this. 			
Response	<p>Noted. Allotments are covered by the open space policy. This offers the same level of protection they enjoyed under the previous plan. It is not considered necessary to have a separate policy for them.</p> <p>Whilst every effort has been made to recognise allotments on the policy map, some, particularly within primary residential areas, are too small to be recognised on a large scale. Should an application for development come forward that could impact on these small allotment sites, they will still be protected under the Open Space policy. Where it is felt that sites have been omitted from the designation, the Council will happily include them on the policy map as and when details are provided.</p> <p>Allotment designations will be amended from primary leisure to open space.</p>			
Proposed Change	<p>Amend policy map to show allotments as Open Space designation rather than Primary Leisure.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1125	Objection	Policy	Overview	
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Page 2 of the NPPF states, at paragraph 6: "The purpose of the planning system is to contribute to the achievement of sustainable Development': And, at paragraph 7:</p> <ul style="list-style-type: none"> • an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. <p>In general the Green Infrastructure part of the Local Plan appears to conform acceptably to the above principles, but might be reinforced in two respects:</p> <ol style="list-style-type: none"> 1. Paragraph 10.4 mentions use of the Landscape Character Assessment Toolkit, for the whole of Cumbria. In the interests of openness and transparency, where a proposal conflicts with the toolkit's, and or other, guidance; or where there is significant community opposition to a proposal; there should exist an unambiguous and robust audit trail showing that all officers and elected members involved in the decision making process have fully considered and understood the proposal and its environmental and community impacts. 2. Further; any person, persons or businesses proven to have damaged or destroyed SSSI's or AONBs, or any other green infrastructure, should be subject to vigorous and stringent enforcement action, including a requirement to fully reinstate the damaged assets. <p>Protection of irreplaceable landscapes and our vulnerable native flora and fauna is of the utmost importance. Worryingly, however; the entire Draft Local Plan appears to refer only once to 'enforcement' - singling out unauthorised traveller developments and encampments, at paragraph 5.131.</p>			
Response	<ol style="list-style-type: none"> 1. Noted. This audit trail currently exists through the planning application process. 2. Agreed. Wording can be included to ensure that any unwarranted or unmitigated damage to biodiversity assets is wholly replaced where possible in the biodiversity policy. 			
Proposed Change	<p>Include reference to enforcement to replace damaged natural assets within the biodiversity and geodiversity policy.</p>			

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

REPRESENTATIONS

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

Chapter Appendix 1

0122	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site adjacent Warwick Bridge School, Warwick Bridge. This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	These two sites are identified as Amenity Open Space in the current adopted Local Plan. They will continue to be identified as such in the preferred options Local Plan. Policy 65 protects such areas from development. The site on the western side of Chapel Close is particularly attractive with a number of mature trees. The site on the northern side could have future potential to accommodate a small number of affordable dwellings. However, at 0.1 ha it is considered too small to allocate.			
Proposed Change	No change to policy in response to site proposal.			

0520	Comment	Policy		
104	Emily Hrycan	English Heritage North West		
Detail	An assessment needs to have been undertaken, as part of the evidence base to underpin the allocations of any sites for development, of the potential impact which they might have upon those elements, which contribute towards the significance of the heritage assets in its vicinity. Where the proposals are considered 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 advice in the NPPF, (Paragraph 137), consideration should also be given to the opportunities, which the development of this area might present to 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 test set out in Paragraph 132 or 133 in the NPPF (and, if appropriate, set out why the harm is justified through the public benefits that the scheme might bring).			
Response	All sites have been assessed against a range of factors including the location of any heritage assets (within or adjacent to the site), the effect the development might have on the significance of the heritage asset, and any opportunities which the development might present to enhance or better reveal the significance of any heritage assets. The site selection criteria will be available as part of the second phase consultation on the Local Plan preferred options.			
Proposed Change	No change to Plan in response to this comment.			

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

0110 Site Proposal Policy

050 Messrs Walker A010

Detail Site at Tower Farm, Rickerby, Carlisle
 It is requested that the site be considered for allocation for residential development within the forthcoming Plan. It is well related to Rickerby which in turn is well related to the City of Carlisle with most services within walking distance. The phase to the rear of the barns would comprise of approx 20-25 units which would reasonably have sales complete in one year and provide the City Council with certainty of supply with no major infrastructure issues which would delay a start on site,

Response Rickerby is a small village of no more than 40 properties. The village is designated as a conservation area. The outbuildings on the eastern edge of the farm group are of an attractive local vernacular style. The form the logical edge to the village. The principle of some development in this location is accepted, as Rickerby is close to Carlisle, and has a safe and attractive walking and cycling route to the City.. However, the scale of any new development should reflect the scale, form and character of the village. 25 additional houses are considered to represent a 50% increase in the size of the village which would not be acceptable. The site is therefore proposed for an additional 10 houses over the lifetime of the Plan.

Proposed Change Allocate site to the west and south of Tower Farm for 10 houses.

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

0121	Site Proposal	Policy		
052	Messrs Hartley			A010
Detail	<p>Site opposite Broomhill, Scotby.</p> <p>It is noted that the Local Plan Preferred Options allocates land within Scotby but that land is currently undeliverable as it requires the acquisition and demolition of another property. In opposition, this site offers land which is immediately available and deliverable with no obstacles to the delivery of new housing, the site is opposite other housing which continues Scotby's linear form but maintains sufficient distance from Cumwhinton to ensure that the 2 villages maintain their identities. It is considered that the land would provide the Council with a housing supply option in Scotby which would support the village's services in an appropriate planned manner.</p>			
Response	<p>The site lies on the furthest southern edge of Scotby, and is physically and visibly separated from the next adjacent group of houses to the north on the eastern side of Broomfallen Road. The site is 1.1 km from the centre of Scotby, and 1.7 km from the primary school. An enquiry about development on the site 13/0095 received the following response:</p> <p>There is no defined pattern of development along the eastern side of Broomfallen Road in this locality. Field 2700 is separated from development to the north by an agricultural access track that is also a public right of way, and by a further agricultural field. There are open views from the field to the East and the South. The site can therefore properly be described as lying within open countryside, and its development would have an unacceptable impact on the landscape and be contrary to paragraph 5.4 of Policy H1 of the adopted CDLP, which states:</p> <p>“The impact of a proposal on the landscape will be a significant factor in determining whether it is acceptable. In most cases it will be more acceptable to locate new housing within the settlement rather than outside the boundary. Sites may also be permitted on the edge of villages provided they:</p> <ul style="list-style-type: none"> relate well to and are contained by the existing landscape features of the area; relate well to the form, scale and character of the rest of the village; and the scheme does not adversely affect the amenity of adjacent dwellings. <p>In addition, the Plan goes on to state that proposals which will extend a settlement in such a way as to act as a precedent for the release of other land for development beyond the village limits will not be acceptable. The release of this land would set such a precedent.</p>			
Proposed Change	No change to Plan in response to this site proposal.			

0128	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	<p>Site at Levens Drive/Raiseland Drive/Randall Road, Morton, Carlisle</p> <p>This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.</p>			
Response	<p>The site lies within a Primary Residential Area where the principle of residential development is already accepted. As such, if access constraints can be overcome, and any proposal complies with all relevant policies in the Local Plan, residential development would be acceptable on this site.</p>			
Proposed Change	No change to Plan in response to this site proposal.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0123	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Lochinvar Close, Longtown This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The northern part of this site lies in a Primary Residential Area and as such the principle of residential development is acceptable. It therefore does not need to be allocated for housing. The southern part of the site lies within flood zone 3. The NPPF and the Technical Guidance to the NPPF states that the overall aim should be to steer new development to Flood Zone 1. LPAs when allocating land in local plans should only consider sites in Flood Zone 3 when there are no available sites in zones 1 or 2.			
Proposed Change	No change to Plan in response to this site proposal.			
0032	Site Proposal	Policy		
015	Client of H & H Land and Property		A003	
Detail	I would like to propose a site that is marked 3 on the attached plan which has not been considered. It is to the west of Scotby Rd and is well related to existing development and would round off the settlement to the north with an existing boundary to the north of the A69 preventing sprawl, and a sufficient separation distance from the M6 not to dilute the independence of Scotby from Carlisle. I am not aware of any flood risk or other significant constraints that would prevent development.			
Response	The proposed access is not wide enough to accommodate two way traffic and a pedestrian footway.			
Proposed Change	No change to Plan in response to this site proposal.			
0142	Objection	Policy		
061	Mr Stephen Prince	Cumbria NHS Partnership FDN Trus	A012	
Detail	The site process is obscure and alternatives are not adequately assessed in planning and development terms.			
Response	Sites have been assessed against a range of criteria including location; access; impact on the following: landscape; biodiversity; heritage assets; scale of proposal; etc. These findings are presented in brief with each preferred site proposal and alternative, and in full in a table of evidence published on the web site at the same time as the second stage consultation.			
Proposed Change	Preferred site allocations and alternative sites in Appendix 1 to all have brief site appraisals. All sites including discarded sites to be published as part of second stage consultation on preferred options with full site appraisal.			

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

0124	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site behind Creighton Avenue and Mardale Road, Carlisle. This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The site extends to 0.2ha and as such would generally be considered too small to allocate for housing in the Local Plan. However, the principle of residential development on this site would be acceptable. In addition it is located in a sustainable location. The site is partially brownfield, and partially PLA. None of the houses in the immediate locality have off street parking. The site currently supports a terrace of garages which provide much used off street parking. The loss of these garages may have the potential to increase on street parking in this area to the detriment of the amenity of the area, and the safety of the streets.			
Proposed Change	No change to Plan in response to this site proposal.			

0125	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site off Reeth Road and Queensway. This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	This site is located in an area which is shown on the Local Plan proposals map as Primary Residential Area. As such the principle of residential development is acceptable in such areas. There is therefore no need to allocate this site for housing. It should be noted that parts of this site provide attractive and valuable amenity open space for local residents.			
Proposed Change	No change to Plan in response to this site proposal.			

0127	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Levens Drive/winscale Way, Morton This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The site appears landlocked. It lies within a Primary Residential Area where the principle of residential development is already accepted. As such, if access constraints can be overcome, and any proposal complies with all relevant policies in the Local Plan, residential development would be acceptable on this site.			
Proposed Change	No change to Plan in response to this site proposal.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0126	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Ashness Drive/Ellsemere Way, Morton, Carlisle This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	This site could accommodate up to 15 dwellings. It is located within a Primary Residential Area, close to neighbourhood shops, primary and secondary school, recreational space and public transport links.			
Proposed Change	Allocate site for 15 units.			
0131	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Botcherby Avenue/Ennerdale Avenue/Borland Avenue, Botcherby, Carlisle This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The site already lies within an area designated as Primary Residential Area. As such the principle of residential development is acceptable within such areas, and the land does not need to be allocated for residential development. However, this is a very small site which is totally landlocked. It is also crossed by a locally important public footpath.			
Proposed Change	No change to policy in response to this site proposal.			
0130	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Botcherby Avenue/Merith Avenue, Botcherby, Carlisle This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The site already lies within an area designated as Primary Residential Area. As such the principle of residential development is acceptable within such areas, and the land does not need to be allocated for residential development. However, this is a very small site which is totally landlocked. It is also crossed by a locally important public footpath.			
Proposed Change	No change to policy in response to this site proposal.			

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

0132	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Durrhill Road/Borland Avenue/Hollywell Crescent, Botcherby, Carlisle This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The site already lies within an area designated as Primary Residential Area. As such the principle of residential development is acceptable within such areas, and the land does not need to be allocated for residential development. However, this is a very small site which is totally landlocked. It is also crossed by a locally important public footpath.			
Proposed Change	No change to policy in response to this site proposal.			

0129	Site Proposal	Policy		
053	Laura Cadman	Riverside (Carlisle)		
Detail	Site at Toronto Street/behind Montreal Street, Currock, Carlisle This site has been identified as a priority for the assessment of housing provision and we would be grateful if you could take these into consideration when identifying sites. As this site is already in our ownership the delivery of affordable housing should be more viable as any project would not have the burden of land acquisition costs.			
Response	The site has access constraints and appears landlocked. It is crossed by a locally important public right of way, and there is a small play area located within it. There is also a terrace of garages which are important locally as there is very little off street parking in this area. The development of this site for housing is likely to lead to an intensification of off street parking to the detriment of the amenity of the area. It lies within an area that is identified on the Local Plan proposals map as a Primary Residential Area. As such the principle of residential development is accepted, provided that any proposals comply with all relevant policies in the Local Plan, and can overcome the identified constraints.			
Proposed Change	No change to Plan in response to this site proposal.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0879	Objection	Policy	BRAM1	
183	Mr RGC Murray & Mrs M Murray			
Detail	<p>- This is prime agricultural land and it is essential that it is not lost.</p> <p>- Site is very hilly and would require a great deal of development. It is believed that the soil is very sandy, has it been tested for building suitability? Other sites have been refused due to unsuitable soil condition. If it was built it would cause flooding issues from water run off.</p> <p>- Brampton schools are at their full capacity? According to the plan no future junior or infant schools are envisaged to be built in the area in the near future and these schools have no room for expansion.</p>			
Response	<p>Brampton is the second largest settlement in the District, and has a population of approximately 4000. It also has a secondary and primary school, and a good range of local services and facilities, including a large medical practice with a wish to expand, a cottage hospital, a library and local shops and other town centre uses. It has a very compact town centre, with little scope for sites within the existing built areas of the town. Most of the land to the north east and south east of the town is of high landscape value, hilly and with little capacity to absorb development without harm to the landscape character. The land to the west is generally flatter, more accessible, and less sensitive in terms of its capacity to absorb development.</p> <p>Surface water flooding can be mitigated in a range of ways, particularly when it comes to increasing the area of permeable surfaces available to absorb rain water. The types of measures that help are green roofs, moves to limit back garden development or the paving over of front gardens, tree planting and the use of permeable paving. There are also engineering solutions to boost the drainage capacity of the areas most likely to flood.</p>			
Proposed Change	No change to Plan in response to this objection.			

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

1060 Comment Policy BRAM1

194 Michael Barry Cumbria County Council

Detail
A Transport Assessment and Travel Plan will be required to support subsequent development proposals. While the site is well positioned to local facilities, given the scale of the development it is considered likely that it may result in town centre parking issues and exacerbate issues associated with school muster times which will need to be mitigated. It is also considered that the site should be served by a link road between Carlisle Road and Greenhill.
With regards part of the site being utilised for a proposed Medical Centre, consideration should be given to whether there are other sites better related to the town centre for this use.

Approximately 5- 10% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding. Surface Water discharge to where? Capacity issues at Brampton Beck

No minerals or waste constraints. Settlement benefits from HWRC facility.

Response
Noted. A number of meetings have taken place with the Brampton Medical Practice, and dialogue with the agent acting on behalf of the site promoter. The medical practice has confirmed that their current building is struggling to meet modern clinical standards, and they wish to expand the practice. They have looked for sites in Brampton centre, but none are available. Bram 1 is being reconfigured so that the proposed site for the medical practice is on the innermost eastern part of the site rather than on the edge.
The development will be expected to not increase the risk of surface water flooding, and also to mitigate against any risk which is currently present.

Proposed Change
No change to policy in response to this comment.

1061 Comment Policy BRAM2

194 Michael Barry Cumbria County Council

Detail
A Transport Assessment and Travel Plan will be required to support subsequent development proposals. Access arrangements will need to be clarified as the site is effectively landlocked and as such it would appear that development depends on ability to acquire access rights over 3rd party land or accept a significantly reduced scale of development.
Public Rights of Way (FP 105013 follows the western boundary of the site) passing through which will need to be taken into account in subsequent development proposals.

1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. Surface Water discharge to where? Capacity issues at Brampton Beck.

No minerals or waste constraints. Settlement benefits from HWRC facility.

Response
Noted. Further discussions are ongoing regarding access arrangements. There is sufficient scope to be able to overcome the access constraints.

Proposed Change
No change to Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1062	Comment	Policy		BRAM3
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. Pedestrian facilities would need to be provided to link to the existing on Gelt Road in order to accommodate pedestrian movement to the town centre.</p> <p>1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. Surface Water discharge to where? Capacity issues at Brampton Beck.</p> <p>No minerals or waste constraints. Settlement benefits from HWRC facility.</p>			
Response Proposed Change	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.</p> <p>No change to Plan in response to this comment.</p>			
1063	Comment	Policy		BRAM4
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. A development of this size would require a link road from A6071 to Greenfield Lane. While it is considered unlikely that development of this site will add to school muster traffic issues, it could add to town centre parking issues which will need to be mitigated. Public Rights of Way FP 105008 (runs diagonally across the site) and FP 105007 (follows the eastern boundary of the site) will need to be to be taken into account in subsequent development proposals. Site has poor accessibility and would require provision of a bus service or a developer contribution towards community transport provision.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. Surface water discharge to north of site beck requires careful control to prevent flooding.</p> <p>There is a small existing scrap-yard site approx 300m to north of proposed site. The potential for amenity impacts should be considered when site is brought forward. Settlement benefits from HWRC facility.</p>			
Response Proposed Change	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.</p> <p>No change to Plan in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0097	Comment	Policy	Brampton	
045	Messrs Rutherford			
Detail	Your current plans of Brampton omit many of the houses along Capon Tree Road making it appear that is not currently developed, whereas they are just large exclusive houses with huge gardens. (satellite photo enclosed).			
Response	The Local Plan policies map will use the most up to date Ordnance Survey map as a base.			
Proposed Change	No change to Plan in response to this comment.			
1046	Comment	Policy	CARL1	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. Site would need infrastructure works to create access off A7/C1022 signalised junction. May have implications for capacity of M6 Jct 44. Consideration should also be given to the development providing alternative access arrangements to the James Rennie School located at the south-eastern corner in order to help resolve school traffic related problems. The following Public Rights of Way will need to be taken into account in any subsequent proposals :- FP 109002 & 120001 run adjacent to the northern boundary of the site. FP 132012 & FP 132020 run adjacent to the eastern boundary of the site.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding</p> <p>No minerals or waste constraints</p> <p>There are currently insufficient school places to accommodate a development of this scale within walking distance of this site. Further consideration will need to be given to how school accommodation may be best provided to meet the needs of this development so as to ensure its sustainability.</p>			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. Further housing allocations have been made in the north of the City in order to trigger the need for a new primary school. The City Council would prefer to allocate a site for a primary school to the north of the river, and looks forward to continued discussions with the County Council in order to identify such a site, to accommodate the primary school requirements in this area.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0624	Comment	Policy	CARL1	
131/3	Miss Judith Crawford			
Detail	I think you should consider Middle Farm, Crindledyke for building more houses not Greymoor Hill as there is already going to be a school there and from Greymoor Hill they would need to cross a very busy road and Middle Farm will have easier access to the facilities already created by the Crindledyke Farm development. I am suggesting an alternative location			
Response	The school proposed at Crindledyke will only accommodate the requirements arising from the new development, and not any additional development north of the river. The Highways Authority have indicated that there are junction and highways capacity issues which can not be satisfactorily overcome associated with any proposed development of land at Crindledyke Farm.			
Proposed Change	No change to policy in response to this comment.			
0649	Objection	Policy	CARL10	
137/9	Mr Andrew Liddle			
Detail	The existing schooling provisions in North Carlisle cannot cope with the numbers in the catchment area, how is this going to be resolved if additional housing is built on this site. The existing road junction from this development will place increased pressure on the road junction from Windsor way and Kingstown Road. This will further increase the capacity using Jct 44 which is also under strain. The development will be in the catchment area for Kingmoor school which does not have the capacity to take additional pupils and may well result in large numbers of children having to go schools outside their locality.			
Response	Consultation with the Education Authority has highlighted the need to allocate a site for a new primary school north of the river, and increase the amount of land allocated for housing, in order that developer contributions can assist in the funding towards a new school. This site remains as an allocation as whilst there are concerns over traffic generation raised by the Highways Authority, they have not indicated that the increase in traffic can not be accommodated. There will be continued dialogue with the Highways and Education Authority over these matters.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1055	Comment	Policy	CARL10	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. However, there are concerns over traffic generation and surface water drainage/flood risk issues. Development of this scale would require a link road from Newfield Park/Windsor Way/Lansdowne Close and bus service provision.</p> <p>It should be noted that Tarraby Lane is not of a sufficient standard to serve significant development and that no vehicular access, with the possible exception of emergency or cycle, should be allowed.</p> <p>May result in capacity issues with M6 Jct 44. Public Right of Way FP 132011 runs adjacent to the site and will need to be taken into account in subsequent development proposals.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. Gosling Syke (main river) also runs through the site. This area has had considerable main river flooding in the past and is on the EA listing for a flood protection scheme.</p> <p>Very high likelihood that buried Archaeological remains will be encountered on site. Appropriate mitigation to record these remains will be required</p> <p>No minerals or waste constraints</p> <p>There are insufficient school places to accommodate a development of this scale within walking distance of this site. Further consideration will need to be given to how additional school accommodation may be provided to meet the needs of this development so as to ensure its sustainability.</p>			
Response	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. Further housing allocations have been made in the north of the City in order to trigger the need for a new primary school. The City Council would prefer to allocate a site for a primary school to the north of the river, and looks forward to continued discussions with the County Council in order to identify such a site, to accommodate the primary school requirements in this area.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			

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

1056 Comment Policy CARL11

194 Michael Barry Cumbria County Council

Detail A Transport Assessment and Travel Plan will be required to support subsequent development proposals. While the site is well positioned in relation to local facilities, there may be a need to improve Stanhope Road's junctions with Wigton Road and Dalston Road.

Approximately 30- 40% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding. Again close a main river which the Ea would make comment on.

No minerals or waste constraints

The deliverability of housing on this site may prove challenging given that despite being identified as a potential housing site for a period it has not emerged. It is suggested that future use for this site be considered in a flexible way and mixed use development at this site may aid delivery.

Response Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. There is a current application for a foodstore on 0.68 hectares of the site. The remainder of the site will remain allocated for residential.

Proposed Change Site allocation amended to reflect portion of the site subject to foodstore application.

1057 Comment Policy CARL12

194 Michael Barry Cumbria County Council

Detail Access arrangements will need to be clarified. Completion of missing section of Petteril Valley cycle path would be integral to scheme design. Likely flood plain issues with parts of site.

Approximately 40% of this site is within Flood zones 2 & 3 or predicted to be at risk of flooding by surface water

No minerals or waste constraints

Response Comments regarding flooding noted. Part of the site will be excluded from being developed in order to accommodate flood flow. It should be noted that the site did not flood in January 2005. Discussions to date with the Environment Agency indicate that the site can accommodate some development, provided that the western part of the site is modelled to accommodate flood risk.

Proposed Change No change to the Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1058	Comment	Policy	CARL13	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. It is assumed that the site will be accessed via the existing "Barley Edge" development estate road. However, it should be noted that the site is remote from local services and ideally a shared cycle/foot path link should be provided along railway corridor to Keenan Park cycle path which will also provide a more direct link to local services and the suburban bus services from the lower end of the site.</p> <p>Surface water drainage will need careful consideration and Lead Local Flood Authority input.</p> <p>Approximately 10- 15% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding</p> <p>Very high likelihood that buried Archaeological remains will be encountered on site. Appropriate mitigation to record these remains will be required</p> <p>No minerals or waste constraints</p>			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			
1059	Comment	Policy	CARL14	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. The existing private road would require upgrading to Local Distributor Road standard. However, the site should only be developed after Site CARL5 in order to ensure satisfactory linkage to A6 is in place.</p> <p>Surface water drainage will need careful consideration and Lead Local Flood Authority input.</p> <p>1:100 year Surface water mapping predicts there a no areas affected by surface water flooding</p> <p>No minerals or waste constraints</p>			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. The agents acting on behalf of the landowner of Carl 5 have indicated that a planning application will be submitted shortly for Carl 5. As such it is likely to be developed before Carl 14. The monitoring framework within the Local Plan will track permissions and constructions, and we will use this information to assess whether allocated sites should be removed from the Plan, if there are no signs that they are going to be delivered, and allocate any appropriate new sites in their place.			
Proposed Change	No change to the Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1047	Comment	Policy	CARL2	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. Assumed access from Pennine Way and Edgehill Road. Arnside Way/Eastern Way junction may need improvement with contribution to A69 corridor depending on the cumulative impact of all proposed sites.</p> <p>Durranhill Beck(culverted) runs through this site. The 1:100 year Surface Water Mapping predicts that approximately 40-45% of the site is at risk of surface water flooding. Flooding of parts of this site have occurred in the past.</p> <p>No minerals or waste constraints</p> <p>The proposed allocation of this site upon its closure is welcomed by the County Council as owner of this site.</p>			
Response	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. Surface water flooding can be mitigated in a range of ways, particularly when it comes to increasing the area of permeable surfaces available to absorb rain water. The types of measures that help are green roofs, moves to limit back garden development or the paving over of front gardens, tree planting and the use of permeable paving. There are also engineering solutions to boost the drainage capacity of the areas most likely to flood.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			
1048	Objection	Policy	CARL3	
194	Michael Barry	Cumbria County Council		
Detail	<p>This recreation land already performs an important public open space role and needs to be retained for this use rather than for the housing use as proposed. It is anticipated that this site would have an important role as part of a wider community facility in association with the development of the new Pennine Way School and Community Centre.</p> <p>The County Council would therefore object to the proposed residential allocation. It should also be noted that the southern part of this site is in the ownership of the County Council and is not available for housing development.</p>			
Response	<p>The site has been deleted from the list of sites allocated for housing development in Policy 19.</p>			
Proposed Change	<p>Policy 19 amended by deletion of site.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1049	Comment	Policy		CARL4
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. This scale of development would need link road from Edgehill Road to Moorside Drive. Extension of suburban bus services likely. May need to contribute to A69 corridor improvements on the cumulative impact of all proposed sites.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding</p> <p>No minerals or waste constraints</p>			
Response Proposed Change	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.</p> <p>No change to Plan in response to this comment.</p>			
1050	Comment	Policy		CARL5
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. However, due to traffic issues associated with the standard of the existing access/lack of visibility onto London Road, an improved two way access, such as the upgrading of Sewells Lonning to Local Access Road standard, will be required. The site also has poor accessibility and would require the provision of new bus stops and possibly a developer contribution towards an increased frequency bus service and potential bus service extension into the site.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. Given extent of site, surface water outfall to south (river Petteril) would be required to prevent flooding.</p> <p>No minerals or waste constraints</p>			
Response Proposed Change	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.</p> <p>No change to Plan in response to this comment.</p>			

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

1051	Comment	Policy	CARL6	
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194	Michael Barry	Cumbria County Council		
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Detail
A Transport Assessment and Travel Plan will be required to support subsequent development proposals. While access arrangements have yet to be provided it is noted that a satisfactory access is available off Wigton Road. However, the site would require the provision of new bus stops and possibly a developer contribution towards an increased frequency bus service.

1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. This again feeds the main Dow Beck watercourse that still has reported flooding to the south west of this site.

No minerals or waste constraints

Response
Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.

Proposed Change
No change to Plan in response to this comment.

1052	Comment	Policy	CARL7	
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194	Michael Barry	Cumbria County Council		
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Detail
A Transport Assessment and Travel Plan will be required to support subsequent development proposals. This large site would be serviced off Orton Road which would need corridor improvements and the suburban bus service extended into the site. Foot and cycle linkages would need to be provided to Primary and Secondary Schools. However, traffic impacts could be very significant and may require major infrastructure improvements at key junctions such as at Orton Road/ Wigton Road. Surface water drainage /flood risk issues will need careful consideration and Lead Local Flood Authority input.

Approximately 5- 10% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding. Dow Beck (ordinary watercourse) runs through the site and has a history of flooding to the north east of the site

No minerals or waste constraints

Response
Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. Surface water flooding can be mitigated in a range of ways, particularly when it comes to increasing the area of permeable surfaces available to absorb rain water. The types of measures that help are green roofs, moves to limit back garden development or the paving over of front gardens, tree planting and the use of permeable paving. There are also engineering solutions to boost the drainage capacity of the areas most likely to flood.

Proposed Change
No change to Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1053	Comment	Policy	CARL8	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. No particular issues with site access off Burgh Road, though some upgrading will be necessary. In addition the site would require provision of new bus stops and possibly a developer contribution towards an increased frequency bus service.</p> <p>1:100 year Surface water mapping predicts there a no areas affected by surface water flooding</p> <p>No minerals or waste constraints</p>			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			
0545	Objection	Policy	CARL8	
114	Mr Albert Rushton			
Detail	<p>Site between power lines and industrial estate and the slope down to the river is hardly gentle. Provides open space area as transitive the rural area and beyond. Don't believe a good/safe access could be achieved on this now very busy road e.g. Access to Northern Development Route. Leave site open or could be an extension to Industrial Estate now better connected to road network.</p>			
Response	The site is currently unused. There is no public access to the site. It is both physically and visibly well integrated with the existing urban form of Carlisle, and close to the CNDR. There is no demand for an extension to the adjacent employment area.			
Proposed Change	No change to Plan in response to this objection.			
1054	Objection	Policy	CARL9	
194	Michael Barry	Cumbria County Council		
Detail	County Council Owned site which is no longer considered available for housing development and the County Council no longer supports the proposed allocation.			
Response	The site has been deleted from the list of sites allocated for housing development in Policy 19.			
Proposed Change	Policy 19 amended by deletion of site.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1065	Comment	Policy		CUMM1
194	Michael Barry	Cumbria County Council		
Detail	When considering site access, it will be important that consideration is given to the achieving a suitable visibility splay.			
	1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. In an area of concern for UU with regard to PR14 in the future.			
	No minerals or waste constraints			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			
1066	Comment	Policy		CUMW1
194	Michael Barry	Cumbria County Council		
Detail	No significant H & T issues			
	1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. However the highway and surrounding areas suffers from flooding and the surface water discharge point for this site will have to be carefully agreed not to increase the current flooding or in fact assist in decreasing the local flooding.			
	No minerals or waste constraints			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1067	Comment	Policy	DAL51	
194	Michael Barry	Cumbria County Council		
Detail	No significant H & T issues			
	1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. Surface water discharge to north of site beck requires careful control to prevent flooding.			
	No minerals or waste constraints			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DAL51, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DAL5 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			
0345	Support	Policy	DAL51	
085	SJ Brough & RR Brough			
Detail	We confirm we support the Council in allocating this land for residential development. We confirm should the land be designated we will work with developers in the area to create a suitable and sustainable development on the site. We would like you to review the shape and the area of the proposed designation. After discussions with a member of the team a plan has been attached with we feel make the site have a stronger relationship with the adjoining existing developments.			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DAL51, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DAL5 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0728	Support	Policy		DALS1
152/24	Mr Craig Brough			
Detail	Dalston is a developing village, to thrive and grow it needs further development, this site will support this and allow a small scale out f village centre development. The white bridge provides excellent walking and cycling links to the heart of the village.			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DALS1, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DALS 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			
0837	Objection	Policy		DALS1
168/43	Mr Chris Drouet			
Detail	This site is more than the 400m stated as the recommended distance any dwellings should be from the services they may require being sustainable. Any dwellings built on this site could not be described as sustainable and also not "green" as their owners would have to use some form of private transport to reach the services of Dalston at a distance of over 1 mile by road. The area known as Buckabank is not an historical area of habitation but just a small cluster of houses following the line of a road. The area that this proposed site resides is an area of rural beauty and part of The Cumbrian Way. As a secluded river valley any intrusion of 15 houses would ruin this beauty and take away the possible shared enjoyment of many visitors as well as residents. As stated in "The Carlisle Green Infrastructure Strategy", green spaces are to be protected ultimately for the sake of their own natural value, but also for the well-being and good health of the districts citizens and visitors. Finally, any road access to this site would be extremely dangerous as the only place of connection with a road would be after a narrow "S" bend, at the bottom of a hill right on a bend which includes another junction. This proposed site, DALS1 should be removed from the list of preferred options for the reasons stated. In addition, there is now no need to have any further site allocations for Dalston as with the recent grant of permission to build 121 houses in Dalston. Any perceived housing need will be fulfilled for the complete period of The Plan.			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DALS1, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DALS 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0749	Comment	Policy		DALS1
154/26/27	Mr Bryan Craig			
Detail	The recent permission for 121 houses in Dalston Village should count as our full allocation for the life of the plan.			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DALS1, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DALS 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			
1068	Comment	Policy		LINS1
194	Michael Barry	Cumbria County Council		
Detail	The road running around this site is private. If it is intended to be used to serve the proposed development, it would need to be upgraded to an appropriate adoptable standard. Given the limitations of the existing highway, while the proposed scale of development is acceptable, any further development in Linstock may require corridor improvements back to A68g roundabout.			
	1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. Some concerns over 1in 100 year flooding surface water flooding to parts of the site also as to where surface water drains would discharge to.			
	No minerals or waste constraints			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1064	Support	Policy	LONG1	
194	Michael Barry	Cumbria County Council		
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals. It is assumed access will be either via upgraded Lovers Lane (PRoW) or Mary St. Preservation of access & parking for community buildings, green space etc: would be required.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. Surface water discharge to north of site beck requires careful control to prevent flooding.</p> <p>No minerals or waste constraints</p> <p>The former Lochinvar School site and playing fields are owned by Cumbria County Council. Part of the former playing fields have been transferred to Longtown Parish Council by way of a long lease to be retained for recreational purposes. This part of the site, under lease, should be excluded from the proposed allocation for the reasons stated. The remainder of the site shown on the attached plan (in Appendix A Policy 19) is available for disposal and suitable to be allocated for housing. The County Council supports the proposed allocation on this part of the site identified within the plan in Appendix A.</p>			
Response	<p>Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. The support for the development of this site is noted. The part of the former playing fields which are on a long term lease to Longtown Parish Council are excluded from the proposed allocation.</p>			
Proposed Change	<p>Site boundary amended to exclude part of former playing fields which have been transferred to Longtown Parish Council for recreational purposes.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1069	Comment	Policy	ROCK1	
194	Michael Barry	Cumbria County Council		
Detail	Is problematic due to the restrictive width of Lonning Foot which would need improving as part of the development.			
	1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding, however, areas surrounding this site have historically flooded and it is know that surface water running across this site may contribute to other flooding.			
	1km south of Hespian Wood Landfill Site and Waste Mgmt Centre. 1km north of N-West Recycling's Waste world. Should be sufficient distance/ buffer to ensure no amenity impacts.			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			
0030	Objection	Policy	SCOT1	
015	Client of H & H Land and Property		A003	
Detail	I question whether this site should be an allocated site due to the uncertainty with regard to access. To be allocated the site should be deliverable within 5 yrs. It appears that a house or houses would have to be demolished to gain access. Setting aside whether it is sustainable to knock down a perfectly serviceable house or houses, unless there is certainty that such houses are under the control of the potential developer of the site then it would be premature to consider the site deliverable. There is no evidence to suggest that this is the case in the plan, if there is then it should be included in the site boundary.			
Response	The site has been deleted as a preferred allocation for housing development. The site promoter had previously indicated that there was some degree of certainty over potential access arrangements through the demolition of a property on Scotby Road. However, no further information has come forward, and due to this lack of evidence, the Council is not satisfied that adequate access arrangements can be made.			
Proposed Change	SCOT1 (land west of Scotby Road) deleted as a preferred allocation for housing development in Policy 19.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1070	Comment	Policy		SCOT1
194	Michael Barry	Cumbria County Council		
Detail	<p>Access arrangements will need to be clarified as the site is effectively landlocked and as such it would appear that development depends on ability to form a new access by demolishing existing property. If a suitable access arrangement can be achieved, there are no major H&T issues.</p> <p>1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. Surface water discharge to west of site beck requires careful control to prevent flooding. UU have concerns with system capacity and have plans for possible PR14 work north of this location.</p> <p>No minerals or waste constraints</p>			
Response	<p>The site has been deleted as a preferred allocation for housing development. The site promoter had previously indicated that there was some degree of certainty over potential access arrangements through the demolition of a property on Scotby Road. However, no further information has come forward, and due to this lack of evidence, the Council is not satisfied that adequate access arrangements can be made.</p>			
Proposed Change	<p>SCOT1 deleted as a preferred allocation for housing development in Policy 19.</p>			
0031	Comment	Policy		Scotby Alternative
015	Client of H & H Land and Property			A003
Detail	<p>I would like to refine the suggested land allocations at SCo2 and also suggest a further site for consideration. The development of the whole of the land at SCo2 would probably be in excess of the settlement's requirements, and the land to the east of the site is not particularly well related to existing development. I consider however that the western part of SCo2 could easily be developed and would relate well to the existing pattern of development. It would therefore be a preferable site than the one allocated.</p> <p>Depending on the level of housing required in Scotby I would like to suggest two parcels of land within the existing SCo2 site. The first (marked 1) on the accompanying plan would be accessed from Scotby Rd through the existing field entrance. The second (marked 2) could either be accessed through site 1 if developed, or could have an independent access via Hillhead where again there is an existing access, or a combination of the two. In both cases exiting field boundaries could be retained and remain intact. I am not aware of any flood risk or other significant constraints that would prevent development on SCo2.</p>			
Response	<p>SCOT2 was shown as an alternative option in the first stage of the consultation on the Local Plan. Scotby has two recent planning permissions, one at Broomfallen Road for 28 dwellings (12/0790, subject to a S106), and land to the rear of Scotby Steading (12/0710) for 45 dwellings. Scotby is a large village in terms of both numbers of houses, and the geographical area which it covers. It has a primary school, shop, pub, church and village hall. The centre of Scotby is 1.5 km from the edge of Carlisle, so has good access to a much wider range of services and facilities which the city offers.</p> <p>The first stage consultation on the preferred allocations Local Plan showed another site (SCOT1) as the preferred option for allocation for housing development. However, the site is acknowledged to have access constraints with no further evidence that such constraints can be overcome. Part of SCo2 is therefore considered to be the next preferable site. The site has no access constraints, is flat, does not flood, integrates well with the built form of this part of Scotby, and has no landscape, biodiversity or heritage designations. As such, 1.3 ha of SCo 2 is allocated for the development of 44 houses to replace SCOT1.</p>			
Proposed Change	<p>1.3 hectares at SCo2 to be allocated for 44 houses.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
o831	Objection	Policy	WARW1	
165/40	Mrs Andrea Wells			
Detail	<p>I have a very strong objection to use Hurley Road as access for this housing application. The roads are unsuitable to allow the increase of traffic. The roads are narrow and the cul de sacs provide a quiet and safe place for children to play. The drains can't cope now with surface water, so what would happen to the water on the development as at the moment the rain runs from the fields onto Hurley road and into the gardens. Also if this application goes ahead it would make it much easier in the future to extend and build more houses along the access routes... In 1973 when Hurley Road was built families had only one car but now families have many more cars to park along the roads causing concern for the safety of their cars ,children playing safely ,and access along Hurley Road. The roads where not built for the amount of traffic it now has to cope with and with lack of proper maintenance are starting to crumble..Is this the route the building delivery lorries would take?. This would change our estate from a safe quiet place to live into a busy noisy place to live with traffic coming past at all hours</p> <p>I do not want access through Hurley Road. Also I am concerned about future building applications to extend the site .</p> <p>General Comment: We received a leaflet on Saturday 14th September at around 5pm from our local councillor regarding this planning proposal. Considering all comments and feedback have to be entered in by Monday 16th September it didn't give people a lot of time to voice their thoughts and feelings. Why was this so?</p>			
Response	<p>The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate. There are no proposals to create though roads or open the cul de sac between the Hurley Road Estate and the proposed new housing site.</p> <p>The draft Local Plan was open for public consultation for 7 weeks. A variety of ways of reaching the wider community included library drop-in sessions, local newspapers, parish councils, a stall in the city centre etc.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
o821	Objection	Policy	WARW1	
162/37	Mr Lee Parkins			
Detail	<p>I have concerns over the roads being able to cope with the traffic and the infrastructure like broadband also being poor. Little Corby and Hurley road in particular currently suffer from traffic congestion, adding more houses will only make this worse. Likewise with the broadband we are poorly served by the Wetheral exchange, which does not feature in Bt's plans to update to provide fibre, more houses will degrade what is currently a poor service. Will the council be addressing this as part of the proposal and will they address the traffic issue? Is the Council proposing to open up the Cul de Sacs on Hurley road?</p> <p>Wetheral telephone exchange upgraded and fibre optic distribution put into Corby Hill and Hurley Road areas. Separate access from the A69 to the proposed site leaving Hurdle road Cul de sacs in touched. Maintain public right of way/ footpath through the wood adjacent to the proposed site.</p>			
Response	<p>The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate. The site will be accessed from the Little Corby Road, and there is no intention to link the development through the Hurley Road Estate, except for pedestrians and cyclists.</p> <p>A site off the Heads Nook Road has been assessed. However, the site is considered to have a greater adverse impact on the landscape, and relate less well to the village form than this proposed site.</p> <p>Policy 36 - Broadband Access states that new development must be able to demonstrate how it will contribute to, and be compatible with, local fibre or internet connectivity. The Policy goes on to say that new development should aim to connect to the internet with a minimum symmetrical speed of 25 Mbps with realistic capacity for future upgrading.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0809	Objection	Policy	WARW1	
159/34	Mr & Mrs S & A Mattinson			
Detail	<p>Apart from the obvious, not wanting to have houses in the field behind our home, we have major concerns about the road network. Little Corby Road to Newby East passes between the Haywain Pub and residential properties, this is already a problematic area. The road is very busy particularly around school run times, many vehicles including large agricultural, often travel too fast around the corners and there are many near misses. Buildings have been struck by vehicles in the past also. We feel that this road cannot take additional volume of traffic for a new housing estate. There is no capacity to create pavements to a new estate between the existing old properties without installing traffic lights. This would however create tail-backs to an already very busy junction at the A69/Little Corby Road. We also feel that the recent pavement alterations to the hill behind the Haywain Pub going towards Hurley Rd and Millriggs creates chaos at certain times. Vehicles are mounting kerbs in order to pass which defeats the object of having a "safe" pavement to walk on. Vehicles sometimes struggle to turn right after descending the hill if there is a queue at the bottom. This area cannot take more vehicles.</p> <p>Why has the area off the Heads Nook/Castle Carrock roads not been considered? Is this because of the affluent homes in the area? The roads are wider and the traffic lights, pelican crossing and pavements are all there already, plus the local amenities inc. the doctors and school are all on that side of the A69. This area is not liable to flooding either but we realise that the sewerage works is further away.</p>			
Response	<p>The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate.</p> <p>A site off the Heads Nook Road has been assessed. However, the site is considered to have a greater adverse impact on the landscape, and relate less well to the village form than this proposed site.</p>			
Proposed Change	No change to Plan in response to this comment.			
1071	Comment	Policy	WARW1	
194	Michael Barry			
	Cumbria County Council			
Detail	<p>A Transport Assessment and Travel Plan will be required to support subsequent development proposals.</p> <p>Is some distance from local facilities. Pedestrian linkages via Hurley Road would be essential and corridor improvements along Little Corby Road.</p> <p>1:100 year surface water mapping predicts there a no areas affected by surface water flooding. More concerns for main river flooding to lower end of site.</p> <p>NB: WwTW approx 500m N-W of site.</p>			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0792	Comment	Policy	WARW1	
157/32	MR DONALD WATT			
Detail	A site to the south side of the A69 would be much more preferable as approximately ninety per cent of the amenities in the Warwick Bridge/Corby Hill area are situated on that side of the road. EG primary school, coop store, Warwick mill business park, garage, filling station, spar shop, post office, three churches and doctors surgery.			
Response	It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A69. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites.			
Proposed Change	No change to Plan in response to this comment.			
1072	Comment	Policy	WETH1	
194	Michael Barry	Cumbria County Council		
Detail	A Transport Assessment and Travel Plan will be required to support subsequent development proposals.			
	1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding, however, there are flooding issues close to this site that are affected by surface water runoff from the proposed site. Careful consideration of any surface water drainage system will be needed to ensure the flood risk to other properties is not increased. Requires S106 for sw discharge to river as improvement for all.			
	No minerals or waste constraints			
Response	Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. This site has been reduced in size by approx half, and a site of broadly equivalent size allocated on the opposite side of the B6263.			
Proposed Change	No change to Plan in response to this comment.			

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

1073	Comment	Policy		WREA1
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194	Michael Barry	Cumbria County Council		
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Detail There are surface water drainage (not flooding) issues that would need to be addressed by any redevelopment. Site has poor accessibility and would potentially require a developer contribution towards community transport provision.

1:100 year Surface water mapping predicts there a no areas affected by surface water flooding. Careful control required for discharge of surface water to beck on the west side of the site.

No minerals or waste constraints

Response Comments regarding range of factors to be taken into consideration noted. There will be continued dialogue with the County Council regarding site selection. The site is located in a village which has a primary school, village hall, church and pub. The location is not considered to have poor accessibility.

Proposed Change No change to Plan in response to this comment.

0243	Comment	Policy	238	Linstock Alternative
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043	Nigel Winter	Stagecoach		
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Detail The development of this site does not support passenger transport and cannot be easily served effectively or sustainably.

Response This site is an alternative to the preferred allocation, and so has not been allocated for housing in the preferred options Local Plan.

Proposed Change No change to policy in response to this comment.

0598	Comment	Policy	246	Carlisle East Alternative
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127	Margaret Miller	Cumbria Housing Group		
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Detail Land at Beverly Rise, Harraby: Cumbria Housing Market Group would support the allocation of this alternative site which would support delivery of affordable housing. [SHLAA site CA 60]

Response The majority of this site forms an important buffer between the M6 motorway and the housing to the east. Six sites have been proposed for allocation in the Harraby/Carlton area of the south eastern part of the City. The Highways Authority has indicated that junction capacity will be an issue if any further allocations are made. SHLAA site CA 60 is, on balance, the least preferable site in this area, and as such has not been proposed for allocation.

Proposed Change No change to Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1078	Comment	Policy	246	Carlisle East Alternative
194	Michael Barry	Cumbria County Council		
Detail	<p>CA27E East Garlands Hospital. Private road through Garlands estate would need improving to Local Distributor standard and suburban bus service extended. Ideally should be taken forwards as mini masterplan involving other sites in the locality and to ensure necessary infrastructure and improvements are in provided to accommodate the development. PRow runs through site. BW 129016 crosses the site running from the Garlands to Scotby. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.</p> <p>Surface water mapping predicts there a no areas affected by surface water flooding</p> <p>No minerals or waste constraints or planning issues</p>			
Response	<p>The site was not allocated as a preferred option for housing in the first phase consultation on the Local Plan, as there were other preferable sites within this locality, and the Highways Authority had indicated that the surrounding road network and junctions would be at capacity. However, as a result of the consultation, site Carl 3 has been deleted as a preferred option for housing, as part of the site is no longer available, and the remainder is on a long term lease for recreational use. The implications of this are that another site will need to be allocated in order for the Plan to be able to meet the proposed housing target.</p> <p>Site (SHLAA ref CA 27E) is available now, does not have any landscape or biodiversity designations, has direct access onto the highway network, and is close to the public transport network. However, it is located on the very fringes of the southern edge of Carlisle, and is a considerable walk from the nearest local shops and primary school. This would need to be addressed through any development proposals for the site.</p> <p>There is a public footpath which crosses the southern part of the site from west to east, which would need to be retained with an appropriate buffer on either side. In addition, the site is open to noise pollution from the M6 which is almost immediately adjacent to the eastern boundary of the site. As such a significant noise buffer will be required, which will be both structural bunding and landscape planting.</p>			
Proposed Change	<p>Site allocated for potential housing development in Policy 19.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
1080	Comment	Policy	246	Carlisle East Alternative
194	Michael Barry	Cumbria County Council		
Detail	<p>CA6o Development of site would require loop local access road from Pennine Way to Garlands Drive. Ideally should be taken forwards as mini-masterplan involving other sites in the locality and to ensure necessary infrastructure and improvements are in provided to accommodate the development. Site has poor accessibility and would potentially require a bus service extension into the site. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.</p> <p>Approximately 5-10% of the site is predicted by Surface Water Mapping to be at risk of surface water flooding. Flood zone 2 covers approximately 30% of the site</p> <p>No minerals or waste constraints or planning issues</p>			
Response	<p>The majority of this site forms an important buffer between the M6 motorway and the housing to the east. Six sites have been proposed for allocation in the Harraby/Carlton area of the south eastern part of the City. It is understood that junction capacity will be an issue if any further allocations are made. SHLAA site CA 6o is, on balance, the least preferable site in this area, and as such has not been proposed for allocation.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			
1081	Comment	Policy	248	Carlisle South & Central Alternat
194	Michael Barry	Cumbria County Council		
Detail	<p>CA64 Significant infrastructure costs in obtaining satisfactory access and drainage. Not well related to existing residential development.</p> <p>Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding. An unnamed Main River runs along the edge of the site.</p> <p>No minerals or waste constraints or planning issues</p>			
Response	<p>The site promoter has indicated that they want the site to continue to be allocated, that they intend to develop it, and that satisfactory access can be achieved. The monitoring framework within the Local Plan indicates that if sites do not come forward for development within the Plan period, the City Council will contact site owners to discuss the barriers to development, with a view to overcoming such barriers if possible. However, if sites ultimately remain undeveloped, the Council will seek to de-allocate them from the Plan, and bring other preferable sites forward.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1075	Comment	Policy	248	Carlisle South & Central Alternat
194	Michael Barry	Cumbria County Council		
Detail	CA10			
	Any significant housing development would be dependant on obtaining connectivity to Upperby Road/St Nicholas Street. Site is spatially well related to existing facilities. Has PRoW (FP 109332 & FP 109331 follows the north and east boundary) through it which could be improved to connect to Petteril cycle path. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.			
	Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding			
	No minerals or waste constraints or planning issues			
Response	The site is shown as an alternative option rather than a preferred option as it largely comprises playing fields, school playing fields and allotments. Part of the site is also an historic land fill site and there are likely to be contamination issues. Some limited housing development may be possible provided that it results in substantial improvements to the rest of the open space.			
Proposed Change	No change to Plan in response to this comment.			
0001	Support	Policy	250	Carlisle West Alternative
002	David Kirkwood	Cumbria County Council		
Detail	I refer to our recent conversation with Richard Wood, in relation to site (CA 12) owned by Cumbria County Council, and can confirm that we believe that this should be allocated within the emerging Carlisle District Local Plan 2015-2030 as a 'Preferred Housing Option'.			
Response	Agree that the site of the former Morton Park Primary School should be a preferred option for housing. The site is cleared and level, and has good accessibility to nearby services and facilities including open space. TPO 245 relates to a group of trees in the northern corner of the site.			
Proposed Change	Site allocated as a preferred option for housing development in Policy 19.			

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

1082	Comment	Policy	250	Carlisle West Alternative
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194	Michael Barry	Cumbria County Council		
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Detail
CA68: P 109397 crosses the site in north westerly direction and would need to be taken into account.
A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.

Approximately 10-15% of the site is predicted by Surface Water Mapping to be at risk of surface water flooding. An unnamed Main River runs along the edge of the site.

Extent is approx 100m south of Cumbria Waste Management's main Waste Transfer Station site for Carlisle. Consequently there is a high likelihood that this would negatively impact upon the amenity of any nearby dwellings.

Response
The site is not proposed for allocation as there is no evidence that the landowner is willing to either develop the site, or sell the site for future development. The site is therefore not considered deliverable.

Proposed Change
No change to Plan in response to this comment.

1079	Comment	Policy	250	Carlisle West Alternative
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194	Michael Barry	Cumbria County Council		
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Detail
CA47
Part of the site is within a flood zone. Adjacent to railway depot and no adequate local roads to support this scale of development. It is unlikely that the roads and pedestrian links can be improved sufficiently in order to serve the site.
Site has poor accessibility and would require provision of a bus service or a developer contribution towards community transport provision.

Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.

Extents are approx 250m south from a scrap-yard site and 300m north of Carlisle's main WwTW and its new sludge processing plant. Medium to high likelihood of an impact on the amenity of residential dwellings. With odour issues being highly probably due to prevailing wind direction,

Response
The site remains as an alternative option rather than a preferred option for housing for the reasons put forward. Other preferable sites are available.

Proposed Change
No change to Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1076	Support	Policy	250	Carlisle West Alternative
194	Michael Barry	Cumbria County Council		
Detail	CA12			
	This site is well related to existing local facilities. Some minor improvements required to Burnrigg but this should be feasible within the highway and site boundaries.			
	Surface water mapping predicts there a no areas affected by surface water flooding			
	No minerals or waste constraints or planning issues			
	The Site is sustainably located on previously developed land, and represents an appropriate location for housing development. It is recommended that this site should be allocated for housing development within the Local Plan			
Response	Agree that the site of the former Morton Park Primary School should be a preferred option for housing. The site is cleared and level, and has good accessibility to nearby services and facilities including open space. TPO 245 relates to a group of trees in the northern corner of the site.			
Proposed Change	Site allocated as a preferred option for housing development in Policy 19.			
o881	Objection	Policy	252	Carlisle North
184	Mrs Andrea McCallum	Clerk to Rockcliffe Parish Council		
Detail	Rockcliffe P C resolved to object to the site due to:			
	- concerns over road infrastructure			
	- the scale of the site and the likely high density of housing on the site being considered too large; another large development recently being undertaken within 1 mile radius.			
	- the lack of availability of school places.			
	- the visual impact on the area. This site being situated in open countryside and visible from the wider area.			
Response	The site is an alternative option for housing, and not a preferred option. As such it has not been allocated in Policy 19.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0851	Objection	Policy	252	Carlisle North
172/47	Mr Robert Park			
Detail	<p>Regarding the proposals for Carlisle North I have little concern about the preferred option however the alternative option shown as CA50 and CA22 (page 252) I find totally unacceptable. The massive Crindledyke development is already underway and to be proposing a second even larger residential development on a very open and exposed green field site immediately adjacent is simply too much for the area to cope with putting vast unwarranted pressure on existing dwellings , infrastructure and communities. I am not sure how it was considered to be a possibility but I would comment that I don't think that the site is suitable for large scale development and many alternative sites to the North would be more suitable. The proposal OC23 on page 274 regarding development of the old 14 MU 3 site at Low Harker for residential use is inappropriate in that this site is most suited to employment and therefore should first and foremost be used for commercial purposes encouraging employment opportunities and not be considered for change of use to residential.</p>			
Response	<p>Both sites referred to in this objection are alternative options, not preferred options, and as such are not allocated for housing development in Policy 19. The second stage preferred options Local Plan consultation will endeavour to clarify 'alternative options' to make it clear that they are not allocated for development - and set out the reasons why.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			
1077	Comment	Policy	252	Carlisle North Alternative
194	Michael Barry	Cumbria County Council		
Detail	<p>CA22 & CA50</p> <p>There are significant concerns regarding the ability of the highway network to accommodate further development in this area particularly regarding potential impact on Junction 44 of the M6. As such, unless it can be clearly demonstrated that the highway network can be sufficiently improved this site should not be taken forward. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.</p> <p>Approximately 5-10% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding</p> <p>No minerals or waste constraints or planning issues</p> <p>It is noted that this site is a considerable distance from Carlisle City Centre and the services available there. This fact does raise concerns around the sustainability of a development of this scale in this location.</p>			
Response	<p>Both sites referred to in this objection are alternative options, not preferred options, and as such are not allocated for housing development in Policy 19. The second stage preferred options Local Plan consultation will endeavour to clarify 'alternative options' to make it clear that they are not allocated for development - and set out the reasons why.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0007	Support	Policy	252	Carlisle North Alternative
006	Messrs G & CE Edminson			
Detail	<p>More suitable than CARL1. The main points raised: SHLAA description - large and open with no major constraints. Slopes gently to large drainage ditch (photos provided with SHLAA submission), not part of a flood plain. It is surrounded by housing/industrial units and lends itself to development and would see development in a confined area over the next 25/30yrs reducing the need to encroach on open countryside. No loss of habitat for wildlife as no hedges and only 1 mature oak tree. Provision of primary School, bus terminal, infrastructure, shop & communal facilities at the adjacent Crindledyke Farm development. Proximity of employment - £60m + expansion at Kingmoor Park to create 500 jobs, and J 44. Further detail within the submission letter.</p>			
Response	<p>The site is an alternative option, not a preferred option for housing development in the Local Plan. Other preferable sites are available, in more accessible locations. The primary school proposed at Crindledyke will take up the capacity created by the Crindledyke Estate. There will be no spare capacity for other housing developments.</p>			
Proposed Change	<p>No change to Plan in response to this representation. The site remains unallocated.</p>			
0419	Comment	Policy	253	Carlisle North
097	Amy Heys	Environment Agency		
Detail	<p>Site 13_11 could exacerbate existing flood risk problems on Gosling Syke if surface water was discharged to the watercourse. Development of this site should be considered alongside the Environment Agency's proposals for a storage basin on Gosling Beck and a very strict application of Policy 45.</p>			
Response	<p>Comments noted. The EA proposal to build a flood storage area on Gosling Beck to the east of this site will be included in the site details/information in the appendix to the Local Plan.</p>			
Proposed Change	<p>Site details amended in Appendix 1 Preferred Housing Allocations to refer to EA proposals to build flood storage area on Gosling Beck.</p>			
0220	Comment	Policy	254	CARL1
043	Nigel Winter	Stagecoach		
Detail	<p>The section of Scotland Rd running past CARL 1 site already features 3 buses per hr in either direction. Consideration should be given to pedestrian movements from the west of Scotland Rd to the site, as it is busy and used by heavy vehicles. Developing the site will support sustainable passenger transport.</p>			
Response	<p>The frequency of bus services is noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p>			
Proposed Change	<p>No change to policy in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0544	Objection	Policy	254	CARL1
114	Mr Albert Rushton			
Detail	Site should remain as open space providing a green buffer zone between urban/rural and hard edge of the motorway. Previous inspections have regarded California Road and surrounding area as almost rural. 'Area of Landscape Significance' particularly what replaces such an area no denigration does not afford protection from developers. Even proposed as a 'Park & Ride'!			
Response	The site has previously been considered during the previous Local Plan Inquiry. There are no landscape, heritage, habitat or access constraints which would prevent the site being delivered.			
Proposed Change	No change to Plan in response to this objection.			
0834	Objection	Policy	254	CARL2
167/42	Mr Keith Abbot		Harraby Catholic Club U 12 boys	
Detail	Part of this site which was used previously used as a car park was a football pitch which was promised by the County Council too be returned to the community as a football pitch after being used as a car park. All together if Carl 2 and Carl 3 where to be used for housing they would be the total lose of four pitch. So where would the children from these development be able to play !!! Use alternative sites.			
Response	There is a commitment by CuCC to demolish Pennine Way Primary School and redevelop it on the adjacent site on Edgehill Road, together with improved facilities and a community hub. The proposals will increase the size of the school from 300 to 630 pupils. Part of the financing of the project is dependent on the redevelopment of this site for housing. More information will be provided on the proposals following further consultation with the County Council.			
Proposed Change	No change to Plan.			
0711	Objection	Policy	254	CARL2
151/23	Mr Bob Sharples		Sport England	
Detail	Part of this site has been used as playing fields or is used as playing fields, therefore the NPPF requires that an assessment is carried out to show that it is surplus or a statement that the land lost is to be replaced. There is no clarity that the land is to be replaced and there is currently no adopted robust playing pitch strategy showing the land is surplus. Therefore Sport England objects to this allocation for housing. The lost land to be replaced as per bullet point 2 of paragraph 74 in the NPPF or the land is shown to be surplus as per bullet point 1 of paragraph 74 in the NPPF.			
Response	There is a commitment by CuCC to demolish Pennine Way Primary School and redevelop it on the adjacent site on Edgehill Road, together with improved facilities and a community hub. Part of the financing of the project is dependent on the redevelopment of this site for housing. More information will be provided on the proposals following further consultation with the County Council.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0221	Comment	Policy	254	CARL2
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			
0422	Comment	Policy	254	CARL2
097	Amy Heys	Environment Agency		
Detail	Disposal of surface water will be complex. United Utilities views should be sought on this allocation.			
Response	Comments noted. There will be continued dialogue with UU and EA regarding the site selection process.			
Proposed Change	No change to Plan in response to this comment.			
0712	Objection	Policy	255	CARL3
151/23	Mr Bob Sharples	Sport England		
Detail	Part of this site has been used as playing fields or is used as playing fields, therefore the NPPF requires that an assessment is carried out to show that it is surplus or a statement that the land lost is to be replaced. There is no clarity that the land is to be replaced and there is currently no adopted robust playing pitch strategy showing the land is surplus. Therefore Sport England objects to this allocation for housing. The lost land to be replaced as per bullet point 2 of paragraph 74 in the NPPF or the land is shown to be surplus as per bullet point 1 of paragraph 74 in the NPPF.			
Response	The site has been deleted as a preferred option for a housing allocation.			
Proposed Change	The site has been deleted from Policy 19 as a preferred option for a housing allocation.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0596	Support	Policy	255	CARL3
127	Margaret Miller	Cumbria Housing Group		
Detail	Land at Harraby Community Centre: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing.			
Response	The site has been deleted as a preferred option for a housing allocation.			
Proposed Change	Site deleted from Policy 19 as a preferred option for a housing allocation.			
0008	Comment	Policy	255	CARL3
007	Cllrs Weber, Sherriff, Earl & Forrester			
Detail	We believe for the wellbeing of the community that this space is retained for sports, leisure and recreation. Indeed should development of up to 130 houses take place, & placing aside a few children's play areas scattered around, Keenan Park will be the only large Green Space encompassing the vicinity stretching from Eastern Way to Carlton, Petteril Bank to Hammonds Pond. Suggest that the proposal be given further detailed consideration with the priority of meeting community needs rather than development of the site because it is in a favourable location. Further comments made within submission letter.			
Response	The site has been deleted as a preferred option for a housing allocation.			
Proposed Change	Site deleted from Policy 19 as a preferred option for a housing allocation.			
0833	Objection	Policy	255	CARL3
167/42	Mr Keith Abbot	Harraby Catholic Club U 12 boys		
Detail	This site will involve the loss of local amenities which include a children's park, a BMX park and 3 football pitches. Under the sports provision in the district document. The consultants have noted that the new format in junior football is leading to over used and lack of football pitches due to the new teams and if the land is used for housing these will be lost forever. The land to the rear of the new Pennine Way school is an area where the Environment Agency issue flood alert. The land also has large UU Drainage Pipes running through the site. Use the two alternative sites Carl 60 and Carl27e			
Response	The site has been deleted as a preferred option for a housing allocation.			
Proposed Change	Site deleted from Policy 19 as a preferred option fro a housing allocation.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0222	Comment	Policy	255	CARL3
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			
0423	Comment	Policy	255	CARL3
097	Amy Heys	Environment Agency		
Detail	Disposal of surface water will be complex. United Utilities views should be sought on this allocation.			
Response	The site has been deleted as a preferred option for a housing allocation.			
Proposed Change	Site deleted from Policy 19 as a preferred option for a housing allocation.			
0223	Comment	Policy	255	CARL4
043	Nigel Winter	Stagecoach		
Detail	Part of this site, furthest east, may be too far with regard reasonable walking distance from the nearest existing bus stop to furthest dwelling. Good pedestrian access from Pennine Way would be essential if the bus is to be considered a viable transport option.			
Response	The Highways Authority have also commented on this aspect, noting that the scale of this development would need a link road from Edgehill Road to Moorside Drive, and the extension of suburban bus services is likely to be needed. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0424	Comment	Policy	255	CARL4
097	Amy Heys	Environment Agency		
Detail	Disposal of surface water will be complex. United Utilities views should be sought on this allocation.			
Response	Comments noted. There will be continued dialogue with both UU and EA regarding site selection.			
Proposed Change	No change to Plan in response to this comment.			
0055	Support	Policy	256	CARL5
032	Clients of Marcus Blake	Berry Bros		A007
Detail	I write with reference to the site identified as CARL5 in the Local Plan Consultation. My clients are charities that have an interest in part of the site (formerly identified as CA41-Land at Carlton Road). The majority of the charities/ beneficiaries support the taking of this site forward for residential development. Furthermore this is a site which may be brought forward with the adjoining land (combined forming CARL5) with Persimmon Homes.			
Response	Support noted.			
Proposed Change				
0397	Support	Policy	256	CARL5
092	Rachael Coar	Persimmon Homes		
Detail	Attached Transport Assessment, Phase 1 Ecology, Flood risk Assessment, Site Plan/layout and supporting statement.			
Response	Support noted.			
Proposed Change				

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

0224	Comment	Policy	256	CARL5
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043	Nigel Winter	Stagecoach		
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Detail Given good pedestrian access to this site from both London Rd & Cumwhinton Rd this development will support sustainable passenger transport.

Response Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

Proposed Change No change to policy in response to this comment.

0425	Comment	Policy	256	CARL5
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097	Amy Heys	Environment Agency		
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Detail Disposal of surface water will be complex. United Utilities views should be sought on this allocation.

Response Comments noted. Continued dialogue will be held with UU and EA regarding site selection.

Proposed Change No change to Plan in response to this comment.

0225	Comment	Policy	256	CARL6
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043	Nigel Winter	Stagecoach		
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Detail Developing the site will support sustainable passenger transport.

Response Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

Proposed Change No change to policy in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0426	Comment	Policy	256	CARL6
097	Amy Heys	Environment Agency		
Detail	Disposal of surface water will be complex. United Utilities views should be sought on this allocation.			
Response	Comments noted. The City Council will seek continued dialogue with both UU and EA regarding site selection and development.			
Proposed Change	No change to Plan in response to this comment.			
0692	Support	Policy	256	CARL6
149/21	Mr Kevin Bell			A021
Detail	My Client is the owner of Site Reference: CA30 - Land Adj to West House Location: Land Adj to West House, Newby West, Carlisle, CA2 6QY which was considered through the Strategic Housing Land Availability Assessment (SHLAA) which has been used to inform the Preferred Options Local Plan for which consultations are currently on going. However, it is not been taken forward as a preferred site for housing allocation on it's own due to access issues although it may be reconsidered if the access arrangements can be overcome, e.g. if the site were to be included as part of a larger submission with the adjacent site at Garden Village (Reference CARL6). Housing Potential: Developable Site Assessment: This greenfield site is located on the edge of the urban area, within the urban area boundary for Carlisle and is designated as urban fringe landscape. Land to the east and north west of this site has been allocated for housing and mixed use development. Development of this site would be dependent on the development of adjacent sites (CA07, CA35) and to some extent CA 03 and CA 37 in order for a comprehensive development to come forward. This sector of the city is generally well served with a range of local services and facilities, including the Richard Rose Morton Academy. My client would like to confirm that all access possibilities and options to include his site as part of a larger submission with an adjacent site will be investigated further and trust that if these issues can be satisfactorily resolved, his site would receive a positive recommendation for housing development.			
Response	This site is proposed to be included within the larger allocation of CARL6. This site will need to be developed as a whole, as it is in three different ownerships.			
Proposed Change	Site to be added to Carl 6 and site details in Appendix 1 amended to reflect that the site is to be developed as a whole.			
0421	Comment	Policy	257	CARL7
097	Amy Heys	Environment Agency		
Detail	We have concerns about the development of Site CARL 7 alongside 10/1026. There is a need for a regional control SUDs pond (similar to the type designed for 09/0413). Development of this site should be considered with a very strict application of Policy 45.			
Response	Comments noted. The City Council will seek continued dialogue with EA regarding site selection and development throughout the Plan period.			
Proposed Change	No change to plan in response to this comment.			

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

0226	Comment	Policy	257	CARL7
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043	Nigel Winter	Stagecoach		
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Detail
In order for passenger transport to serve the efficiently and effectively it is my view that the site road network requires connection with Queensway. Extending an existing bus service is the most economic means of servicing a new development keeping costs down (and fares) and vehicle omissions in comparison to a new dedicated service, which will be expensive, duplicate mileage over existing routes and may require financial support.

Response
Direct connectivity with Queensway through Hebden Avenue looks problematic. The Highways Authority has commented that the site would be serviced from Orton Road which would need corridor improvements and the suburban bus service extended into the site. The traffic impacts may require major infrastructure improvements at key junctions such as Orton Road/Wigton Road.
The Infrastructure Deficit Plan will address the issue of public transport capacity. The Council will encourage developers to liaise with public transport operators, so that the infrastructure required as a result of a development proposal can be accommodated. This will include such matters as additional bus stops, additional or extended routes, and potentially additional services. Development must be sustainable in all respects, including in terms of accessibility and location. Where the impact of a development proposal on the public transport network needs to be mitigated, a section 106 may be entered into.

Proposed Change
No change in response to this comment.

0686	Support	Policy	257	CARL7
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147/19	Mr Viv Dodd			
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Detail
Response
Support noted.

Proposed Change

0227	Comment	Policy	257	CARL8
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043	Nigel Winter	Stagecoach		
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Detail
Developing the site will support sustainable passenger transport.

Response
Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

Proposed Change
No change to policy in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0832	Objection	Policy	258	CARL10
166/41	Mrs Yvonne Maynard			
Detail	<p>Objection to CARL10 based on the following: 1. Views - currently our property backs onto the green belt, addition of the properties would restrict this with our property then being overlooked 2. Drainage - Clay soil on the fields means that the drainage on the field area is currently poor, this would not assist properties that were built on there - The fields currently drain into the beck running through Windsor Park - 2005 floods saw this beck flood into Pennington Drive at Morrison's end. The addition of more properties would increase this and may cause water ingress directly onto our property which backs onto this - what guarantees would be given against this? 3. Traffic - main entrance to new site would be through Windsor Park, this would increase congestion at the Gosling Bridge junction onto Kingstown Road. Already a bad junction, traffic lights would not be an option. - Many properties on Abbotsford Drive and Jaysmith Close back onto Windsor Way and have little/no parking so they park along Windsor Way making the road already 1 car width to pass. Significantly increasing traffic volume would case dangerous access due to cars parked meaning cars passing on wring side of road 4. Schools - addition of so many houses would mean addition schools would be required as Stanwix and Kingmoor are already overloaded - surely this is not cost effective as Belah school has been recently demolished - surely this should have been considered as part of the local plan?! Objecting the CARL 10 plan - do not build in this area at all due to previous reasons already stated causing further congestion to an already populated area. Solution is to look at alternative areas that tie in with the development of the new bypass on the outskirts of the city, develop these new areas with better transport links diverting traffic away from an area that does not need further congestion</p>			
Response	<p>The loss of a view from an adjacent private property is not a material consideration when making planning decisions. The EA has indicated that they are proposing to build a flood storage area on Gosling Beck to the east of this site, which will alleviate existing flooding problems in the area. If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans). Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. In the case of developments with anticipated limited transport impacts).</p> <p>The former Belah School site is to remain available as a potential site for the future development of a primary school to serve the community in north Carlisle.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0638	Objection	Policy	258	CARL10
134/6	Mr Nigel Holmes			
Detail	<p>CARL10 lies immediately behind our home. This is a greenfield site, lots of wildlife including a wide variety of birds. To build on this site would damage the habitats of many animals and birds. Windsor Park is a quiet semi-rural estate where children play on the streets, noise is at a minimum and traffic is slow and infrequent. CARL10 would create extra noise and traffic. School places north of the River Eden are already stretched following the closure of Belah.</p> <p>Want CARL10 not to go ahead. Do not agree that Carlisle needs 15,000 new homes. Use up all brownfield sites first and demolish derelict buildings.</p>			
Response	<p>Due to the development of the majority of the brownfield sites in Carlisle, the draft Local Plan has had to allocate many greenfield sites. There is no longer a national or regional brownfield site target following the introduction of the NPPF. Any development of this site would have to include an ecological survey. The purpose of the survey is to examine what habitats and species exist at the site when a planning application is submitted. This ensures that an informed decision is made, that wildlife can be protected from injury or disturbance during development and makes certain that there is no adverse impact on local biodiversity as a result of the development. Carrying out appropriate ecological survey of the site will ensure that:</p> <ul style="list-style-type: none"> •Both the developer/applicant is made aware of the ecological constraints at the site at an early stage. •The development can be designed so that it has the least possible adverse impact on the biodiversity of the site. •The presence of species that are afforded special protection under European or British legislation will be identified within the site and immediate surrounding area, so that the development can be designed to avoid impact on these populations and direct injury to individuals (that may result in prosecution). •By knowing the existing ecology of the site and surrounding area, the design of mitigation and enhancement can compliment existing habitats and species. <p>If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans). Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. In the case of developments with anticipated limited transport impacts). The EA has indicated that they are proposing to build a flood storage area on Gosling Beck to the east of this site, which will alleviate existing flooding problems in the area.</p> <p>The former Belah School site is to remain available as a potential site for the future development of a primary school to serve the community in north Carlisle.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0644	Objection	Policy	258	CARL10
136/8	asd@asd.co.uk [undelivered]			
Detail	Object			
Response	<p>If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans). Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. In the case of developments with anticipated limited transport impacts). The EA has indicated that they are proposing to build a flood storage area on Gosling Beck to the east of this site, which will alleviate existing flooding problems in the area.</p> <p>The former Belah School site is to remain available as a potential site for the future development of a primary school to serve the community in north Carlisle.</p>			
Proposed Change	No change to Plan in response to this objection.			
0036	Comment	Policy	258	CARL10
017	Frederick Watson			
Detail	<p>The only issue I have is that there is only one entrance/exit into the estate which is Windsor Way. Traffic calming measures which were not put in place when Windsor Park was built have recently been put in place and are ineffective as constant traffic travelling at high speeds use the road which is a public safety issue.</p>			
Response	<p>If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans).</p> <p>Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).</p>			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0043	Comment	Policy	258	CARL10
022	Mr & Mrs C Swain			
Detail	<p>1. Object to the reference to Wolsty Close being an access point. The land on all sides of the road are privately owned, it isn't wide enough and there is no footpath. It was built to a standard to provide a turning circle for 5 homes. Point 5 also states that at the northerly point it has a well established rural hedge which give character to the estate. To make it an access road, private land would be needed on the east, west & north side of the road and would come within 0.5m of my house. RESOLUTION: Leave Wolsty Close as it is and not to use is as access to CARL 10.</p> <p>2. Comments re: 'Established housing with potentially easily accessed routes into and out of the site'. The Junction onto the A7 is far from easy access. Turning Into the Site: Only space for 2 cars when turning right and when turning left the speed bumps are far too close to the junction. It will no doubt have to be re-sited if we have HGVs along Windsor Way to the proposed Site. When leaving Windsor Way: The new bypass may have reduced the amount of traffic heading towards Carlisle, it is now travelling faster making it harder to turn both left or right. RESOLUTION: Bearing in mind traffic lights already on the A7 near to this point would need expert opinion to find a solution.</p> <p>3. Windsor Way bearing in mind 2 access/exit points to The Gosling Bridge, unmarked crossroads, parked cars, potholes, the width of the road meaning that two cars cannot pass each other when there is a parked vehicle is especially dangerous when driving from the A7. RESOLUTION: As there are already established homes and business we do not see a solution. However the road should be resurfaced if the build takes place at the builders expense.</p> <p>4. Public Open Space on Windsor Park Estate is used by the children of the estate for football etc and the area is bounded the roads indicated as potential access roads for CARL 10 which would make the area unsafe for the children. RESOLUTION: we see no solution to this as the original concept is of a 'village green' and as such no changes to the area would be acceptable.</p> <p>6. What plans are there for a Primary School and Public Open Space/Play Area for the children of the new estate? RESOLUTION: Build a new school to the east side to the A7, we suggest on the estate CARL 10 also provide a Public Open Space/Play Area as well.</p> <p>7. The statement 'The site is flat grazing land' is incorrect some is arable, barley is growing at the moment. Will 300 homes on this land adversely effect run-off onto Wolsty Close? RESOLUTION: This needs to be looked into as a priority which Cumbria's heavy rain.</p>			
Response	<p>No access to Carl10 is proposed from Wolsty Close.</p> <p>If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans). Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts). The EA has indicated that they are proposing to build a flood storage area on Gosling Beck to the east of this site, which will alleviate existing flooding problems in the area.</p> <p>The former Belah School site is to remain available as a potential site for the future development of a primary school to serve the community in north Carlisle.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0659	Objection	Policy	258	CARL10
140/12	Ms D Graham			
Detail	<p>The intended most direct access route to this proposed development will be via Windsor Way, with further access from Lansdowne Close. This potential increase in through traffic is a cause for concern given that the traffic calming measures implemented in the past year have not had much noticeable impact upon the speed, and consequently the noise, of traffic going to and from the far end of Windsor Way, where the new houses will be sited. Better traffic calming methods are currently required and the proposed increase in traffic will make these imperative. Surely given the size of the development it would be beneficial to both existing and proposed new residents to have access from the other side of the development. Could Tarraby Lane be widened to accommodate extra traffic or could access be made via Newfield Park?</p> <p>Increase traffic calming measures on Windsor Way. The newly implemented ones have not made much difference to the speed of traffic or the noise they make. Slow them down!!</p>			
Response	<p>No access from Lansdowne Close is intended for this site. Other potential accesses are Newfield Park and Drumburgh Avenue. The Highways Authority have indicated that Tarraby Lane is not suitable for widening. If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans).</p> <p>Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			
0662	Objection	Policy	258	CARL10
141/13	Mrs Claire Reid			
Detail	<p>I feel strongly that I would not relish the prospect of further houses being built in the fields surrounding Windsor Park. It is large enough as it is and currently there is a massive shortage of school places north of the river and that problem has existed for many years and is not yet resolved. Leave some green areas within the city for wildlife to occupy and to be free of pollution from more traffic. Keep the community atmosphere.</p>			
Response	<p>If the site comes forward for development during the Plan period, the traffic impact of the proposal will be assessed through a Transport Assessment. Transport Assessments and Statements are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans). Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. In the case of developments with anticipated limited transport impacts). The EA has indicated that they are proposing to build a flood storage area on Gosling Beck to the east of this site, which will alleviate existing flooding problems in the area.</p> <p>The former Belah School site is to remain available as a potential site for the future development of a primary school to serve the community in north Carlisle.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0229	Comment	Policy	258	CARL10
043	Nigel Winter	Stagecoach		
Detail	A new bus service will be required to service this site, as it is too far from existing bus services to provide an extension of service option. The current nearest bus service to the site is in my opinion too far to walk to be an attractive travel option.			
Response	The information is noted. The Highways Authority have indicated that development of this scale would require a link road from Newfield Park/Windsor Way/Lansdowne Close and bus service provision. The Highways Authority have also indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			
0420	Comment	Policy	258	CARL10
097	Amy Heys	Environment Agency		
Detail	Site CARL 10 could exacerbate existing flood risk problems on Gosling Syke if surface water was discharged to the watercourse. Development of this site should be considered alongside the Environment Agency's proposals for a storage basin on Gosling Beck and a very strict application of Policy 45.			
Response	Comments noted. The EA proposal to build a flood storage area on Gosling Beck to the east of this site will be included in the site details/information in the appendix to the Local Plan.			
Proposed Change	Site details amended in Appendix 1 Preferred Housing Allocations to refer to EA proposals to build flood storage area on Gosling Beck.			
0396	Support	Policy	258	CARL10
092	Rachael Coar	Persimmon Homes		
Detail	Attached Transport Appraisal, Phase 1 Ecology, Indicative Masterplan/layout and supporting statement.			
Response	Support noted.			
Proposed Change				

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0228	Comment	Policy	258	CARL9
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			
0002	Comment	Policy	259	CARL11
003	Mr S Mclean			
Detail	Enough land to build an ALDI, and swimming baths and maybe an ice rink as well			
Response	Comment noted.			
Proposed Change	The available site area has been amended to exclude the part of the site subject to 13/0778, application for the erection of a foodstore. Site area and yield amended to 0.68 ha and 60 houses.			
0230	Comment	Policy	259	CARL11
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0867	Objection	Policy	259	CARL11
175	Cllr Hugh McDevitt	County Councillor Denton Holme		
Detail	My preference is for this site is that it needs to be identified for mixed use development, this includes commercial, residential and retail opportunities.			
Response	The available site area has been amended to exclude the part of the site subject to 13/0778, application for the erection of a foodstore. Site area and yield amended to 0.68 ha and 60 houses.			
Proposed Change	The available site area has been amended to exclude the part of the site subject to 13/0778, application for the erection of a foodstore. Site area and yield amended to 0.68 ha and 60 houses.			
0231	Comment	Policy	259	CARL12
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			
0232	Comment	Policy	260	CARL13
043	Nigel Winter	Stagecoach		
Detail	Given good pedestrian access to Scotby Road, developing this site will support sustainable passenger transport.			
Response	Noted. They have also indicated that the site is remote from local services and ideally a shared footpath/cycle link should be provided along the railway corridor to Keenan Park cycle path which will also provide a more direct link to local services and the suburban bus services from the lower end of the site. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.			
Proposed Change	No change to policy in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0401	Objection	Policy	260	CARL13
094	Cllr Betton			
Detail	<p>It would be appreciated if City Council could look at possible proposed development of Durranhill Road green field land again, I feel and would like to suggest there are alternative areas that could accommodate the future plan regarding development just as well.</p> <p>Reasons for this are firstly to encourage brown fill land used first and deter use off green field country area. Secondly Durranhill Road is a small country lane posing problems.</p> <p>Two cars can be accommodated on this road but two busses or indeed a bus and a lorry are too much for the small width of this road. There are problems with road lighting here i.e. not enough and also issues with the footpath leading to Montgomery way in that there is room for one person only.</p> <p>Importantly if development were approved in the local Plan there would be an escalated increase in population and vehicle use adding to congestion and speeding problems already happening along Durranhill Road.</p> <p>Relating to this I would like to see a safe restrictions on this road as to usage, there has already been one death and predicted proposed development would not benefit I would like to suggest that the points mentioned regarding the road and development existing are revisited and health and safety encouraged.</p>			
Response	<p>This site is allocated for the development of 100 houses in the adopted Carlisle District Local Plan.</p> <p>The Inspector's report following the inquiry into the previous adopted Local Plan recommended that the site be allocated for housing. Under the regulations this report is binding on all parties.</p> <p>The NPPF removes national targets for brownfield development, preferring instead to concentrate on sustainable locations for development in terms of access to local services and facilities including public transport. This site is well located on the edge of Carlisle within the urban area boundary, and is close to a range of local services including two primary schools, a supermarket, park and playing fields and a frequent bus service.</p> <p>A Transport Assessment will be required with any proposal to develop this site. The National Planning Policy Framework states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and submitted with a planning application for the development. It will then be used to determine whether the transport impact of the development is acceptable.</p>			
Proposed Change	No change to Plan in response to this objection.			
0233	Comment	Policy	260	CARL14
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	<p>Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p>			
Proposed Change	No change to policy in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
o875	Objection	Policy	261	BRAM1
181	Mr Martin & Mrs Linda Richardson			
Detail	<ul style="list-style-type: none"> - Site is Greenfield and farmed land with hedgerows offer habitat for wildlife. - Start of 'Urban Creep' into rural countryside, where will it stop. More suitable locations in the town which will prevent this. - Impact of the privacy of the existing residents on Elmfield & Greenhill. Area behind Kirby Moore would have less impact as it is located next to the school - Traffic impact on Carlisle Road and will cause safety issues with traffic from the Industrial Estate.. Area behind Kirby Moore has good access on a road which is less busy. - Brampton Schools are already at capacity. Extra housing will create additional congestion. - Relocation of the medical practice is just a sweetener to get the planning permission. There is no benefit to the people of Brampton as it is in a less central/accessible position. - Brampton does not need all these homes. Over 60 currently on the market some of which have been on the market for some considerable time. If there was demand they would be selling. 			
Response	<p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0470	Objection	Policy	261	BRAM1
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	<p>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.</p> <p>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 (e.g. with the boundary as shown on the map attached). Efforts should be made to retain the hedgerows bounding and within the site.</p>			
Response	<p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0039	Objection	Policy	261	BRAM1
177	Mr Joseph A Fisher			
Detail	<p>Object to the allocation for relocation of Brampton Medical Practice and 200 houses.</p> <ul style="list-style-type: none"> - The proposed allocations would result in 500 new dwelling for Brampton - where is the need and who has carried out the survey to support this. - loss of agricultural land and hedgerows offering a home to many species of wildlife - extra housing would have an impact on congestion & parking within Brampton - Story Homes artist impression shows main access to be adjacent to the industrial estate, how would this work with the existing heavy traffic and access to the A69 is too fast flowing. -Primary and secondary schools are full and parking safely is an issue. - The affordable housing requirement should be on the Cates Old Garage site which is an eyesore, could be purchased by the Council for this purpose. - Parish Council are against any large scale development and another site was proposed between William Howard School & Kirby Moor Home. - Relocation of Brampton Medical Centre has been used by the developers to gain favour for your approval as no consultation has taken place with the residents of Brampton - would prefer it to be extended (use The White Lion?) or the other proposed allocations within Brampton 			
Response	<p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
o869	Objection	Policy	261	BRAM1
178	Mrs & Mrs Scott			
Detail	<p>Object to the allocation for relocation of Brampton Medical Practice and 200 houses.</p> <ul style="list-style-type: none"> - extra housing would have an impact on congestion & parking within Brampton, smaller sites would be more appropriate - Relocation of Brampton Medical Centre would prefer it to be extended (use The White Lion?) -Primary and secondary schools are full and parking safely is an issue. - Would remove natural habitat for wildlife which is rapidly diminishing as hedgerows are being removed. - the smaller allocations would be more appropriate at this present time for the welfare of the residents of Brampton. 			
Response	<p>There has been ongoing dialogue with the Brampton Medical Practice, and the most recent meeting took place in October 2013. The Practice has indicated that it has a number of challenges with its current location predominantly that it has literally grown out of its current space and is acutely aware of the access problems for elderly and disabled patients. That said the practice is very committed to the local population in Brampton and is also aware of the benefit to local retailers from patients visiting the surgery.</p> <p>There is a unique funding challenge facing General Practices and the availability of national or local funding now or in the future is information which cannot be second guessed.</p> <p>The practice has indicated that it is happy for the site to be identified in the Local Plan as a possible location for a General practice.</p> <p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4,000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards.</p> <p>The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
o876	Objection	Policy	261	BRAM1
182	Mr William H Howlieson & Mrs Phyllis			
Detail	<p>Object to the allocation for relocation of Brampton Medical Practice and 200 houses.</p> <ul style="list-style-type: none"> - The proposed allocations would result in 500 new dwelling for Brampton - where is the need and who has carried out the survey to support this. - loss of agricultural land and hedgerows offering a home to many species of wildlife - extra housing would have an impact on congestion & parking within Brampton - Story Homes artist impression shows main access to be adjacent to the industrial estate, how would this work with the existing heavy traffic and access to the A69 is too fast flowing. -Primary and secondary schools are full and parking safely is an issue. - The affordable housing requirement should be on the Cates Old Garage site which is an eyesore, could be purchased by the Council for this purpose. - Parish Council are against any large scale development and another site was proposed between William Howard School & Kirby Moor Home. - Relocation of Brampton Medical Centre has been used by the developers to gain favour for your approval as no consultation has taken place with the residents of Brampton - would prefer it to be extended (use The White Lion?) or the other proposed allocations within Brampton 			
Response	<p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0902	Objection	Policy	261	BRAM1
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	200 houses at this site is too dense. The site was not supported by the PC through earlier SHLAA consultation. We are aware of opposition to this site from local residents. The view of Brampton Medical practice is that it does not agree that this site is the preferred option for a health centre.			
Response	<p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0298	Objection	Policy	261	BRAM1
078	Mr Trevor Wilson			
Detail	<p>The existing Brampton Medical Centre is in Front Street in the centre of the village and is conveniently sited for the chemist for prescriptions, other shops, the library and within equal walking distance of all properties in Brampton.</p> <p>The proposed location is out to one edge of the town and would thus be more reliant on cars and generate an increase in traffic not only to and from the new location but also passing into and out of Brampton town centre. If you travelled by car to the new location then you would inevitably drive into the town centre on the return trip for the chemist and shops etc, thus increasing traffic in the town centre.</p> <p>The site in Carlisle Road is not on the main bus route, 685 Carlisle-Brampton-Newcastle, which operates via Greenhill. It could be closer to the 'frequent and regular bus service' by placing the centre on Greenhill.</p> <p>There are no reasons given why this site has selected and has been deemed suitable.</p> <p>At the session in Brampton library Saturday 10th August, the planners present suggested the bus route could be rerouted to serve the proposed new location but it was not clear if the bus companies have been consulted. Have Stagecoach and Arriva who operate the 685 been consulted?</p> <p>However, the existing Medical Centre does suffer from being on multiple levels and is thus not disability and mobility friendly.</p> <p>Presumably, a new Medical Centre would be all on one level and thus easily accessible, or if on more than one level then lifts will be provided.</p> <p>I think the choice of location and the services to be provided should be the subject of a separate consultation but do note that the subject of combined (or part combined) new health facilities has been the subject of debate and review and funding issues over the last 4-5 years.</p> <p>Add further information to the document supporting the reasons for this choice of location. If this is a site safeguarding decision, please clearly state so.</p>			
Response	<p>There has been ongoing dialogue with the Brampton Medical Practice, and the most recent meeting took place in October 2013. The Practice has indicated that it has a number of challenges with its current location predominantly that it has literally grown out of its current space and is acutely aware of the access problems for elderly and disabled patients. That said the practice is very committed to the local population in Brampton and is also aware of the benefit to local retailers from patients visiting the surgery.</p> <p>There is a unique funding challenge facing General Practices and the availability of national or local funding now or in the future is information which cannot be second guessed.</p> <p>The practice has indicated that it is happy for the site to be identified in the Local Plan as a possible location for a General practice.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0272	Objection	Policy	261	BRAM1
075	Bob Allen	Brampton & Beyond Community Tr		
Detail	<p>Land on Carlisle Road is designated as a medical centre. Such a new facility has been the subject of discussions in the past, but never in connection with this site. Without any apparent consultation, this proposal is made in the Plan. There is no definition of the scope this "medical centre", and no justification for its location on this land, half a mile from the town centre. The Trust provides community facilities in Brampton and therefore has an interest in both the scope and location of any such centre, and this should also be the subject of a properly facilitated community discussion before any allocation is made.</p> <p>The Trust would wish at this stage to make the point that this draft Plan does not provide an adequate basis for determining the above specific issues. There are many options and implications, including for the town centre and its public buildings, which should be properly considered by the community before any uses are allocated.</p>			
Response	<p>There has been ongoing dialogue with the Brampton Medical Practice, and the most recent meeting took place in October 2013. The Practice has indicated that it has a number of challenges with its current location predominantly that it has literally grown out of its current space and is acutely aware of the access problems for elderly and disabled patients. That said the practice is very committed to the local population in Brampton and is also aware of the benefit to local retailers from patients visiting the surgery.</p> <p>There is a unique funding challenge facing General Practices and the availability of national or local funding now or in the future is information which cannot be second guessed.</p> <p>The practice has indicated that it is happy for the site to be identified in the Local Plan as a possible location for a General practice.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0870	Objection	Policy	261	BRAM1
179	Mr Joseph and Mrs Carol Ratcliffe			
Detail	<p>Object to the allocation for relocation of Brampton Medical Practice and 200 houses.</p> <ul style="list-style-type: none"> - The proposed allocations would result in 500 new dwelling for Brampton - where is the need and who has carried out the survey to support this. - loss of agricultural land and hedgerows offering a home to many species of wildlife - extra housing would have an impact on congestion & parking within Brampton - Story Homes artist impression shows main access to be adjacent to the industrial estate, how would this work with the existing heavy traffic and access to the A69 is too fast flowing. -Primary and secondary schools are full and parking safely is an issue. - The affordable housing requirement should be on the Cates Old Garage site which is an eyesore, could be purchased by the Council for this purpose. - Parish Council are against any large scale development and another site was proposed between William Howard School & Kirby Moor Home. - Relocation of Brampton Medical Centre has been used by the developers to gain favour for your approval as no consultation has taken place with the residents of Brampton - would prefer it to be extended (use The White Lion?) or the other proposed allocations within Brampton 			
Response	<p>The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.</p> <p>Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.</p> <p>This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.</p> <p>The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.</p> <p>In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council continues to work closely with the Education Authority to consider the cumulative effects of development on schools.</p>			
Proposed Change	No change to Plan in response to this objection.			

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

0872	Objection	Policy	261	BRAM1
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180 Mr Ian & Mrs Helen Forth

Detail

- I do not think there is a demand for 200 more houses in Brampton. Currently a great number of properties available to buy or rent.
- Potential building sites which have lain undeveloped for years i.e. At the junction of Carlisle Road/Elmfield.
- Access would be situated on probably the busiest route into the town being used by HGVs going to and from the industrial estate.
- congestion in the centre, especially at the junction of Carlisle Road/Longtown Road and Main Road/Union Lane during the school runs. The development would exacerbate the existing problem.
- I am certain the Primary & Secondary Schools do not have sufficient places to cope with a huge population increase. Longtown is also being considered for major development and since the closure of Lochinvar School secondary school children would need to be accommodated at William Howard.
- Brampton is a rural market town. This is agricultural land leased to a local farmer whose livelihood will be affected. Owners are not local so will not be affected by the development.
- If all the proposed allocations are allowed to be developed, it won't be long before one of the major supermarkets will be attracted to the town. This would without a doubt bring about the demise of many local businesses and the Farmers Market.

-Primary and secondary schools are full and parking safely is an issue.

- Parish Council are against any large scale development and another site was proposed between William Howard School & Kirby Moor Home.
- Relocation of Brampton Medical Centre has been used by the developers to gain favour for your approval as no consultation has taken place with the residents of Brampton - would prefer it to be extended (use The White Lion?) or the other proposed allocations within Brampton

Response

The Carlisle Housing Need and Demand Study indicates at paragraph 11.12 that in the longer term economic growth is expected to drive additional net in-migration to the District. Projected housing requirements driven by trend based economic growth would result in a higher housing requirement, equating to 665 dwellings per year. The population of the District is divided into approx 70% in the urban area and 30% in the rural area. Therefore the Plan seeks to facilitate housing according to the population split. Vacant houses in any location are part of the normal turnover of housing stock, as people buy and sell. They do not indicate that there is no need for additional houses.

Brampton is the second largest town in the District, and has a population of approx 4000. It also has a good range of local services and facilities, including a primary and secondary school. It has good road connections to Carlisle and Newcastle, and a train station, although this lies outside the town. It therefore has substantial housing allocations in the preferred options Local Plan.

This site is more easily served by public transport, and has less of a landscape impact than the alternative site which lies north of Kirby Moor. There is potential to create a new boundary on the western edge of Brampton. Any proposal for development will need to take measures to sensitively integrate the development into the wider landscape and townscape character. A green infrastructure approach should be taken, retaining and enhancing existing established hedgerows and trees. New boundaries will be expected to be delineated by hedges, reflecting local character.

The medical centre has indicated support for a proposed relocation in order that they can operate from a purpose built facility which meets modern clinical standards. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required to support subsequent development proposals. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

In order to ensure the delivery of sufficient school places to meet the needs of development, Policy 47 requires developer contributions to be made. The City Council

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

continues to work closely with the Education Authority to consider the cumulative effects of development on schools.

Proposed Change
No change to Plan in response to this objection.

0234 Comment Policy 261 BRAM1

043 Nigel Winter Stagecoach

Detail
The section of this site furthest south of Carlisle Rd will present an unattractive option for bus travel as walk times to the nearest bus stop will be too great. Diverting the current bus service into the site is an option given good road access with regard penetration and speed journey time.

Response
Welcome the proposed option to divert the current bus service. The Highways Authority have commented that the site should be served by a link road between Carlisle Road and Greenhill. They have also indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

Proposed Change
No change to policy in response to this comment.

0271 Objection Policy 261 BRAM2

075 Bob Allen Brampton & Beyond Community Tr

Detail
The last remaining unoccupied site in the town in public ownership. The Plan allocates it for housing without apparently giving any consideration to alternative uses. There are other potential uses for this site, about which representations by the community have been made in the past for community use of this land. The Trust would wish to see consideration given to other uses, including community-based energy generation and horticulture. Before a properly facilitated community discussion on this, it would be wrong to allocate this piece of public land for housing, especially since such large amounts of land in the town are allocated for this purpose elsewhere in the Plan, which appears to be far in excess of any realistic estimate of demand or of what the market could deliver. The Trust would wish at this stage to make the point that this draft Plan does not provide an adequate basis for determining the above specific issues. There are many options and implications, including for the town centre and its public buildings, which should be properly considered by the community before any uses are allocated.

Response
Publicly held assets are a significant resource. Local authorities nationally hold approximately two-thirds of public assets, and there is pressure on them to obtain the best value possible upon the sale of these assets in order to support economic growth and help meet deficit targets. Section 123 of the Local Government Act 1972 enshrines the statutory duty on local authorities to achieve best value in the context of land disposals. It says that a local authority may dispose of land held by it in any manner it wishes providing it is not for a consideration 'less than the best that can reasonably be obtained' (unless the Secretary of State consents to the disposal).

Proposed Change
No change to Plan in response to this objection.

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

0594	Support	Policy	261	BRAM2
127	Margaret Miller	Cumbria Housing Group		
Detail	Land SW of Kingwater Close, Brampton: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing.			
Response	Support noted.			
Proposed Change				

0471	Comment	Policy	261	BRAM2
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District does not oppose the allocation of this site as it is well related to the rest of Brampton. However we would like to see a commitment that all hedgerows and mature trees within and surrounding the site are retained.			
Response	This level of detail will be addressed at the planning application stage. Policy 67 makes provision for new development to provide for the protection and integration of existing trees and hedges on new development sites.			
Proposed Change	No change to Plan in response to this comment.			

0903	Support	Policy	261	BRAM2
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	Support development of this site, however this was once the preferred site for a new health centre and we would support this development rather than housing.			
Response	Support and comment noted.			
Proposed Change				

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0235	Comment	Policy	261	BRAM2
043	Nigel Winter	Stagecoach		
Detail	This site will be difficult for passenger transport to service efficiently and effectively. However given a spine road for BRAM1 the bus could better serve BRAM2.			
Response	Noted. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport			
Proposed Change	No change to policy in response to this comment.			
0904	Support	Policy	262	BRAM3
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	It would relieve a current eye-sore.			
Response	Support noted.			
Proposed Change				
0236	Comment	Policy	262	BRAM3
043	Nigel Winter	Stagecoach		
Detail	Developing this site does not support sustainable passenger transport. This site may not be serviced efficiently or easily by passenger transport.			
Response	Noted. However, the site will be required to create a pedestrian link to Gelt Rise to allow pedestrian access to Gelt Road, which is a short distance from Brampton town centre.			
Proposed Change	No change to policy in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0905	Support	Policy	262	BRAM4
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	We would support a lower amount of housing on this site, the current proposal of 153 is too high. The land on the site is undulating, not flat as stated in the Plan. It would be an appropriate site for a health centre. Access to this site should be from the Longtown Road.			
Response Proposed Change	Support and additional comments noted. The site thresholds are indicative only, and comments regarding these figures are welcomed through the consultation process.			
0472	Objection	Policy	262	BRAM4
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District does not oppose the allocation of this site as it is well related to the rest of Brampton. However we would like to see a commitment that all hedgerows and trees within and surrounding the site are retained. It 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. 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 enclosed). 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.			
Response	This level of detail will be addressed at the planning application stage. Policy 67 makes provision for new development to provide for the protection and integration of existing trees and hedges on new development sites. Other Policies in the Plan including Policy S4 - Green Infrastructure, Policy 62 - Landscapes, and Policy 64 - Biodiversity and Geodiversity adequately cover the points raised in the objection.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0237	Comment	Policy	262	BRAM4
043	Nigel Winter	Stagecoach		
Detail	Developing this site, given good bus road network connectively with Longtown Rd and Dacre Rd, provides for the potential of new passenger transport services in this part of Brampton.			
Response	Noted. The Highways Authority has commented that the site has poor accessibility and would require provision of a bus service or a developer contribution towards community transport provision. The Highways Authority have indicated that a transport assessment and a travel plan will be required to support development proposals on this site. A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport. Development must be sustainable in all respects, including in terms of accessibility and location. Where the impact of a development proposal on the public transport network needs to be mitigated, a section 106 may be entered into.			
Proposed Change	No change to policy in response to this comment.			
0051	Comment	Policy	263	Brampton Alternative
028	Client of Taylor & Hardy	Ref: MEH/J/C11/090		A004
Detail	Clients are pleased that their site is identified as having residential development potential as they wish to bring the site forward for development at the earliest opportunity.			
Response	BR01 is an alternative option and as such has not been identified as a preferred allocation for housing development in Policy 19. The site has less potential to integrate well with the existing built form of Brampton, development here is considered to have more of a landscape impact, and is less accessible by public transport than other preferred sites in Brampton.			
Proposed Change	No change to Plan in response to this comment.			
0899	Comment	Policy	263	Brampton Alternative
188	Mrs Alison Riddell	Clerk to Brampton Parish Council		
Detail	Why is this site an 'alternative option' when this was the PC's preferred site through the SHLAA consultation?			
Response	This site is an alternative option, not a preferred option for housing development. It is included in the Plan in order that all alternative sites can be consulted upon. Other sites, which are not considered to have any merit as alternative options, will be included in the SHLAA update so that they are available for public scrutiny. The other sites in Brampton, which are shown as preferred options for housing in Policy 19 are considered to have less of an impact on the landscape, and be more accessible to public transport.			
Proposed Change	No change to Plan in response to this comment.			

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

0238	Comment	Policy	263	Brampton Alternative
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043	Nigel Winter	Stagecoach		
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Detail Unlike BRAM4 this site will not so easily be served by passenger transport or efficiently. I doubt a sustainable bus service will effectively serve this site.

Response This is an alternative site and so is not a preferred option for housing allocation in this Plan.

Proposed Change No change to policy in response to this comment.

0473	Objection	Policy	263	Brampton Alternative
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102	Dr Kate Willshaw	Friends of the Lake District		
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Detail Friends of the Lake District objects to the Brampton Alternative Option site on the basis that it is very poorly related to the town for shops and services. Its allocation would also mean the loss of attractive open countryside.
Request: Removal of this proposed allocation

Response This site is an alternative option, not a preferred option for housing development. It is included in the Plan in order that all alternative sites can be consulted upon. Other sites, which are not considered to have any merit as alternative options, will be included in the SHLAA update so that they are available for public scrutiny. The other sites in Brampton, which are shown as preferred options for housing in Policy 19 are considered to have less of an impact on the landscape, and be more accessible to public transport.

Proposed Change No change to Plan in response to this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1083	Comment	Policy	263	Brampton Alternative
194	Michael Barry	Cumbria County Council		
Detail	<p>Old Church Lane is unsuitable as means of access. Site has poor accessibility and would require provision of a bus service or a developer contribution towards community transport provision. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.</p> <p>Approximately 5-10% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding.</p> <p>Brampton HWRC is approx 280m to west of site as the crow flies. Therefore there is some low potential for some amenity conflict/impact.</p>			
Response	<p>This site is an alternative option, not a preferred option for housing development. It is included in the Plan in order that all alternative sites can be consulted upon. Other sites, which are not considered to have any merit as alternative options, will be included in the SHLAA update so that they are available for public scrutiny. The other sites in Brampton, which are shown as preferred options for housing in Policy 19 are considered to have less of an impact on the landscape, and be more accessible to public transport.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			
0239	Comment	Policy	264	LONG1
043	Nigel Winter	Stagecoach		
Detail	<p>Developing the site will support sustainable passenger transport.</p>			
Response	<p>Noted. The Highways Authority has indicated that a transport assessment and travel plan will be required to support subsequent development proposals.</p>			
Proposed Change	<p>No change to policy in response to this comment.</p>			
0474	Comment	Policy	264	LONG1
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	<p>Friends of the Lake District consider that this site is the best option for allocation as it is well related to the rest of Longtown for ease of access for shops and services. However, if there are no other playing fields available in the town, then any development on this site must be accompanied by provision of playing fields and associated facilities as a Planning Obligation on the developer.</p>			
Response	<p>Part of the former playing fields have been transferred to Longtown Parish Council by way of a long lease to be retained for recreational purposes. This part of the site has been excluded from the proposed allocation.</p>			
Proposed Change	<p>Site boundary amended to exclude part of the playing fields. Site area and yield amended in Policy 19.</p>			

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

0240	Comment	Policy	264	Longtown Alternative
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043	Nigel Winter	Stagecoach		
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Detail LO 02 - Cannot be effectively and efficiently served by passenger transport.

Response This site is an alternative option for Longtown and has therefore not been allocated for housing in the preferred options Local Plan. The site is not as accessible as Long1, and does not integrate well with the existing built form, extending out into open countryside.

Proposed Change No change to policy in response to this comment.

1084	Comment	Policy	264	Longtown Alternative
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194	Michael Barry	Cumbria County Council		
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Detail LO02: Would require extension of urban infrastructure.

1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding

Located within the Solway Moss Registered Battlefield. Strongly recommend that if this site is considered for inclusion in the local plan that English Heritage are consulted on the potential impact to the Registered Battlefield.

LO03: Includes flood attenuation pond, and the drainage/flooding issues will need careful consideration and Lead Local Flood Authority input.

Approximately 10-15% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding. Lochinvar Beck (main river) runs through the site

Both: No minerals or waste constraints or planning issues

Response This site is an alternative option, not a preferred option for housing development. It is included in the Plan in order that all alternative sites can be consulted upon. Other sites, which are not considered to have any merit as alternative options, will be included in the SHLAA update so that they are available for public scrutiny. The site in Longtown, which is shown as a preferred option for housing in Policy 19 are considered to have less of an impact on the landscape, be more accessible to public transport, and to have no other constraints, including flood issues.

Proposed Change

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0475	Objection	Policy	264	Longtown Alternative
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District object to the allocation of this greenfield site on the basis that it is large and extends into open countryside, and would leave a gap to the west between the allocation site and the rest of the town. Request: Remove as option from Local Plan.			
Response	This site is an alternative option, not a preferred option for housing development. It is included in the Plan in order that all alternative sites can be consulted upon. Other sites, which are not considered to have any merit as alternative options, will be included in the SHLAA update so that they are available for public scrutiny. The site in Longtown, which is shown as a preferred option for housing in Policy 19 are considered to have less of an impact on the landscape, be more accessible to public transport, and to have no other constraints, including flood issues.			
Proposed Change	No change to Plan in response to this objection.			
0241	Comment	Policy	264	Longtown Alternative
043	Nigel Winter	Stagecoach		
Detail	LO 03 - the northern section of this site will be served by passenger transport. Given a bus spine through this site to Old Road LO 02 may then be served by passenger transport.			
Response	This site is an alternative option for Longtown and not a preferred allocation for housing. It does not integrate as well with the built form of the town as Long1.			
Proposed Change	No change to policy in response to this comment.			
1135	Support	Policy	265	CUMM1
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	Cummersdale Parish Council supports option CUMM1.			
Response	Support noted.			
Proposed Change				

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1137	Comment	Policy	265	Cummersdale Alternative
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	<p>CUDo2 was included in the Rural Master plan Consultation in 2012, Cummersdale parish Council request that this site is also included as an alternative site in Cummersdale. The community would not accept a large scale development, but would support a small scale housing development, with the inclusion of low cost/first time buyer housing and those suitable for the elderly.</p>			
Response	<p>The preferred allocation for Cummersdale is located at the north western end of the village, and is included within Policy 19 for the provision of 14 houses. Cummersdale has a good range of local services and is close to Carlisle. The village has just over 100 houses, and the allocation therefore represents an approximate 10% increase over the lifetime of the Plan. That is not to say that no more housing would be allowed in the village, as Policy 20 makes provision for windfall development (on sites not specifically allocated for housing). Whilst the PC and community support for some housing west of The Oval is recognised, there are access issues to overcome, which have not been satisfactorily resolved at this time. It may be possible for future housing to come forward on this site under Policy 20.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			
1136	Comment	Policy	265	Cummersdale Alternative
196	Mrs S Tarrant	Clerk to Cummersdale Parish Coun		
Detail	<p>Alternative CUDo3: Recommend that a turning point should be provided for traffic and appropriate access to the existing bridle way to Grace Lane.</p>			
Response	<p>The preferred allocation for Cummersdale is located at the north western end of the village, and is included within Policy 19 for the provision of 14 houses. Cummersdale has a good range of local services and is close to Carlisle. The village has just over 100 houses, and the allocation therefore represents an approximate 10% increase over the lifetime of the Plan. That is not to say that no more housing would be allowed in the village, as Policy 20 makes provision for windfall development (on sites not specifically allocated for housing). CUDo3 has been identified as an alternative site for allocation for housing, rather than the preferred site. Development of this site would have a greater impact on the landscape than CUMM1.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1085	Comment	Policy	265	Cummersdale Alternative
194	Michael Barry	Cumbria County Council		
Detail	No significant Highway concerns subject to access arrangements. It should be noted that depending on the access arrangements and localised improvements, existing trees and hedgerows may be affected.			
	1:100 year Surface water mapping predicts there a no areas affected by surface water flooding			
	No minerals or waste constraints or planning issues			
Response	The preferred allocation for Cummersdale is located at the north western end of the village, and is included within Policy 19 for the provision of 14 houses. Cummersdale has a good range of local services and is close to Carlisle. The village has just over 100 houses, and the allocation therefore represents an approximate 10% increase over the lifetime of the Plan. That is not to say that no more housing would be allowed in the village, as Policy 20 makes provision for windfall development (on sites not specifically allocated for housing). CUD03 has been identified as an alternative site for allocation for housing, rather than the preferred site. Development of this site would have a greater impact on the landscape than CUMM1.			
Proposed Change	No change to Plan in response to this comment.			
0983	Comment	Policy	266	CUMW1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	There is an issue with flash flooding, with water flowing directly on and over the B6263 - if development of this site was to occur - attenuation tanks would be required.			
Response	The lead Local Flood Authority has indicated that the 1:100 year surface water mapping predicts that there are no areas affected by surface water flooding. However, the highways and surrounding areas suffer from flooding, and the surface water discharge point for this site will have to be carefully agreed so as not to increase the current flooding. Any development proposal should aim to decrease local flooding.			
Proposed Change				
0431	Comment	Policy	266	CUMW1
097	Amy Heys	Environment Agency		
Detail	Potential capacity problems on sewer and surface water sewer. United Utilities should be consulted on this site. Greenfield runoff rates should be applied to development on this site.			
Response	The lead Local Flood Authority has indicated that the 1:100 year surface water mapping predicts that there are no areas affected by surface water flooding. However, the highways and surrounding areas suffer from flooding, and the surface water discharge point for this site will have to be carefully agreed so as not to increase the current flooding. Any development proposal should aim to decrease local flooding.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0005	Objection	Policy	267	DALS1
005	Paul Barton	Clerk to Dalston Parish Council		
Detail	Parish Council object to the allocation of the site as the location is not close enough to Dalston centre to be considered a sustainable location. NPPF paragraph 17 and 76 are referred to and wish the site to be protected from development due to its sensitive nature. Additional letter dated 22/08/13.			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DALS1, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DALS 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			
0535	Objection	Policy	267	DALS1
111		Cowen Flowline Ltd		A018
Detail	Dalston is clearly a significant settlement with a range of services and facilities. The quantum of development proposed to be allocated is minimal at 15 units. Further allocations are needed. The proposed site at Buckabank is totally greenfield, less sequentially preferable and would have significant visual and landscape character impacts [see site proposal at Ellers Mill Ref No 0534]			
Response	Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DALS1, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	DALS 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0476	Comment	Policy	267	DALS1
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	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 if this site is carried forward as an allocation.			
Response	Planning application 12/0878 was granted planning permission for the development of 121 houses, open space and associated infrastructure. United Utilities has advised that when the development goes ahead it will take up all of the available headroom at the waste water treatment works which lies to the north east of the village. As such, no further allocations are proposed in Dalston. Other small scale housing will be permitted in the village under Policy 20.			
Proposed Change	DALS 1 deleted as preferred option for allocation. Land between Townhead Road and Station Road allocated as preferred option for housing development in Dalston.			
1086	Comment	Policy	267	Dalston Alternative
194	Michael Barry	Cumbria County Council		
Detail	Presumed to take access off Madam Banks/Crackegarh Road. Public Right of Way FP114041 runs along the north west boundary of the site and would need to be taken into account should development occur. Depending on the scale of the development, a Transport Assessment and Travel Plan may be required. Approximately 5-10% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding. No minerals or waste constraints or planning issues			
Response	Comments noted. This site remains as the alternative option for Dalston. Planning application 12/0878 gained planning permission in August 2013 (subject to a S106) for 121 houses, associated open space and infrastructure. This site will be allocated in the Local Plan to safeguard it for development, and to recognise that the principle of housing development on this site is acceptable. United Utilities have confirmed that the development will take up all of the available headroom at the waste water treatment works which lie to the north east of the village. This site is in a preferable location to the previous preferred option DALS1, being centrally located and within walking distance of the range of local services and facilities which lie within Dalston. As such it is considered that the site presents a more sustainable option for development than the previous preferred option, which will be deleted.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0477	Comment	Policy	268	LINS1
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District would prefer to see the LINS1 site being allocated, as the OC31 and OC32 sites are less well related to the village and are on significantly larger sites and would therefore have a greater landscape impact.			
Response	Comment noted. The Council agree. LINS 1 is the preferred allocation.			
Proposed Change	No change to plan in response to this comment.			
0432	Comment	Policy	268	LINS1
097	Amy Heys	Environment Agency		
Detail	Relates to all allocations at Linstock: These sites are both in flood zone 1 but the extent of the flood zones could be inaccurate in these areas. A flood risk assessment to ascertain the extent of the flood zone is recommended for both of these sites.			
Response	Comment noted. The site appraisal process will continue to address this issue, and any subsequent application for development will be required to submit a FRA.			
Proposed Change	No change to Policy in response to this comment.			
0006	Objection	Policy	268	LINS1
001	Geoffrey Holden			
Detail	The evaluation of the site is inaccurate - is subject to regular flooding, last time 28 July 2013. Surface water from adjacent housing is discharged onto site and copy of part of the deed pertaining to the soak away which outlines the responsibilities of the landowner attached.			
Response	The site lies in flood zone 1 but the extent of the flood zones could be inaccurate in these areas. A flood risk assessment to ascertain the extent of the flood zone is recommended for this site. New development would be expected to take all measures to deal with any increase in surface water run-off and to deal with any existing flooding problems.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0242	Comment	Policy	268	LINS1
043	Nigel Winter	Stagecoach		
Detail	The development of this site does not support passenger transport and cannot be easily serviced efficiently or sustainably.			
Response	The comment is noted. However, Linstock is considered to be a sustainable location for limited new development due to its proximity to Carlisle, and a dedicated footpath/cycleway link to the City.			
Proposed Change	No change to policy in response to this comment.			

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

0623	Objection	Policy	268	LINS1
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130/1	Mr Alan Gadman			
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Detail

Lins1. The preferred site in Linstock appears to take no notice of the strains already existing in the village with the developments that have already taken place. This specifically is in regard to increased traffic, lack of safe footpaths and street lighting, access to the site from single carriage way roads, the lack of any meaningful public transport and the absence of any affordable housing in the village. There is an increasing use of the Rickerby Park road to Carlisle and the consequent impact this has on the park itself and Rickerby. Reference is made to no history of flooding but already with the increased building, roads, greens and drains in the village are flooding for the first time in living memory! Recent planning applications in the village have been passed without due regard to these issues and the need to provide off road parking leading to a significant use of the limited amount of footpaths being used for parked vehicles. The planning applications that have been passed do not provide any affordable housing so the village is now confined to high income earners with multiple cars. I have no confidence in the local enforcement of planning regulations if passed for the preferred site. Builders simply ignore requirements and are then provided with retrospective permission. The proposed 10 properties are likely to mean families with more than one car and the need to attend local schools that have neither the capacity or the bus services to accommodate the children. The increased traffic using the A689 has created additional risks at the Linstock roundabout without any traffic calming measures being put in place. This makes access and egress from the village a nightmare at certain times of the day. A feature of life locally is the number of residents that either work from home or keep commercial vehicles at their property this is likely to increase with further development and no provision for additional traffic of this type. The previous plan for Linstock confined development to within the village boundary, this should be adhered to except for appropriate development of existing agricultural buildings for affordable rental property not holiday lets. In addition please note: I see no reason why the previous building plan for Linstock should not remain a feasible approach to development within the building boundary of the existing village. I am not convinced that sufficient note is taken of the impact of recent changes to the mains water system in Linstock that appears to have caused localised flooding of some drains and greens for the first time. There is also the issue of the capacity of the recently installed sewerage system that still requires remedial work when foul smells occur near the main drain. There is limited footpath provision in the village when children are walking back from school or around the village. There is increased traffic without any changes to the road system and there is no enforcement when vehicles continually block the existing footpaths by parking because houses have not been required to be built with sufficient off road parking. There is no affordable housing provision in the village and the planning applications that have been passed in my view have not been adequately considered or monitored for compliance with the regulations.

Response

Since 2008 there have been two planning permission for dwellings, one for a holiday let and the other for one house. Linstock is a small village of just less than 100 houses. The community facilities are a village hall, green and play area. The village is less than 3km from Carlisle, and there is a dedicated footpath and cycleway from The Beeches to Carlisle. The village is considered to be a sustainable location for small scale development over the lifetime of the Plan. An additional 10 houses would require 30% affordable housing contribution. The previous Local Plan did not make any provision for development within Linstock, therefore effectively placing the village in a sustainability trap, whereby no new housing could take place. The NPPF advocates that in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. An additional 10 houses over the next 10-15 years is considered to be an appropriate scale of development for the village. There is potential to widen the access road to the west of the site as the land to the north west is in the same ownership. The site lies in flood zone 1 but the extent of the flood zones could be inaccurate in these areas. A flood risk assessment to ascertain the extent of the flood zone is recommended for this site.

Proposed Change

No change to Plan in response to this objection.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1127	Objection	Policy	268	LINS1
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>Access to this site would probably need to be shared with Linstock Castle Farm Linstock lacks any community infrastructure save The Women's Institute Hall, and a children's play area provided by Stanwix Rural Parish Council. Public transport links are poor. The William Howard School bus does not run through the settlement and in order to use the bus children must walk to and from, and cross, the very busy A68g. The road between Linstock and Rickerby is subject to local flooding which often renders it impassable to most domestic vehicles. The settlement has been subject to significant expansion over recent years leaving it with un-adopted roads and infrastructure.</p> <p>For these reasons the Parish Council believes the site to be unsustainable.</p>			
Response	<p>The site owner also owns the adjoining land to the north west. There is potential to widen the access road to Linstock Castle Farm as this is the preferable access to the site.</p> <p>Whilst it is acknowledged that the range of community facilities in Linstock is low, the village is less than 3km from Carlisle, and is therefore considered to be a sustainable location for some small scale development over the lifetime of the Plan. Since 2008 there has only been 2 planning permissions for domestic dwellings. Any future development would be expected to be subject to a Flood Risk Assessment.</p>			
Proposed Change	No change to Plan in response to this objection.			
1087	Comment	Policy	268	Linstock Alternative
194	Michael Barry	Cumbria County Council		
Detail	<p>OC31: This scale of development would require significant highway corridor improvements back to A68g roundabout. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.</p> <p>OC32: The road running on the southern boundary of this site is private. If it is intended to be used to serve the proposed development, it would need to be upgraded to an appropriate adoptable standard. Given the limitations of the existing highway, should this site be brought forward in addition to the preferred option, corridor improvements back to A68g roundabout may be required.</p> <p>Both: 1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding No minerals or waste constraints or planning issues</p>			
Response	Comments noted. This site is the alternative option for Linstock, and therefore does not appear in Policy 19 as a preferred allocation for housing.			
Proposed Change				

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0713	Objection	Policy	268	LONG1
151/23	Mr Bob Sharples	Sport England		
Detail	<p>Part of this site has been used as playing fields or is used as playing fields, therefore the NPPF requires that an assessment is carried out to show that it is surplus or a statement that the land lost is to be replaced. The wording on p264 of the Plan is ambiguous. There is no clarity that the land is to be replaced and there is currently no adopted robust playing pitch strategy showing the land is surplus. Therefore Sport England objects to this allocation for housing.</p> <p>The lost land to be replaced as per bullet point 2 of paragraph 74 in the NPPF or the land is shown to be surplus as per bullet point 1 of paragraph 74 in the NPPF.</p>			
Response	<p>The former Lochinvar School site and playing fields are owned by Cumbria County Council. Part of the former playing fields have been transferred to Longtown Parish Council by way of a long lease to be retained for recreational purposes. This part of the site, under lease, has been excluded from the proposed allocation. The remainder of the site is available for disposal and suitable to be allocated for housing.</p>			
Proposed Change	<p>Site boundary amended to exclude part of former playing fields which have been transferred to Longtown Parish Council for recreational purposes.</p>			

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

o826	Objection	Policy	269	ROCK1
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163/38	Mr William Gordon Percival			
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Detail

Rockcliffe East A proposal of 20 dwellings on a small plot of land to the east of Lonning Foot. Page 269 states that the land is generally flat and not at risk of flooding. However, the field actually slopes in two directions. In the recent past the field has been a quagmire. Even a tractor is unable to enter the field for over two years. The evidence of this is tyre tracks at the field's gate and the failure to cut the hedges surrounding the field for over three years. The main concerns I have are: Access Page 269 of the local plan acknowledges that access to Lonning Foot is inadequate and that the road will need improvement. Lonning Foot is very busy at peak times; traffic from Stanwix via Cargo village travelling North to Todhills, Metal Bridge and Gretna, or workers and vehicles travelling to work at Hesperin Wood use the route on a daily basis. Without compulsory purchase of residents gardens or reducing the area available for development, it is difficult to conceive how access could be improved without the removal of hedges. Reduction of light The local plan on page 269 does not specify how the dwellings will be built. The field Rockcliffe East is higher than the land on the west side of Lonning Foot. To fit 20 houses they must be two storey houses. If this is the case, my concern would be morning daylight to my property (The Saltings) will be obscured by the development. I also value my privacy that I enjoy and do not want to be overlooked from 2nd story windows. Property Devaluation I have lived in my property (The Saltings) for over 25 years. It has country views out of the front and if you build 20 houses I will no longer have this. I do not know how much my house is worth, but undoubtedly it will cause the value to drop. I would like to know how this matter would be addressed and how we would be compensated. Local Amenities The village has no shops. The Post Office I use only opens for two hours on a Tuesday. The Crown and Thistle closes often due to no one to run it. The local church is open at present but the future is threatened by lack of income. A bus service runs to and from Carlisle a few times a day. It may seem 20 houses is not a great deal but the addition traffic to and from local shops and the existing village amenities will add pressure to the existing route through the village. Schooling The village school has just over 100 pupils, however, it serves more pupils outside of Rockcliffe than it does the resident children of Rockcliffe. This is due to the closure of Belah school and increased numbers at Kingmoor and Stanwix Schools with the result of children being transported into the village from the surrounding area. Another 20 families will certainly add more to the register. Are you going to make the school bigger to accommodate these extra pupils? Alternative development I see little need for development of any new dwellings at Rockcliffe East. If low cost housing is needed to the North of the city of Carlisle, there is plenty of scope at Crindledyke Farm where there is going to be plenty of shops, school places and better roads. This will preserve Rockcliffe with the village ambience that it enjoy. Surface water Lonning Foot is a farm track that once carried a great deal of water off the land and directed it via ditches to the river Eden. In February 2002 my neighbour send a letter to the city council, expressing concerns about volumes of water that accumulated at Lonning Foot and the land drainage problems in the area. Around February 2003 a drainage engineer produced a flood report. Some work has been carried out but the problem still remains. In wet weather water cascades of the field that you wish to build 20 houses. All the ditches up the road from The Saltings past Croft Cottage just cope with the volumes of water. Therefore if the development takes place the water from the new houses will have to be diverted away from the existing drainage system. Foul water and sewage The building of 20 new houses at Rockcliffe East will add volumes of sewage and foul water to the existing system. The existing sewage pipes on the East side of Lonning foot are cracked and damaged. There is no mains foul water or sewage at the houses Hamethwaite or Croft Cottage they are served by septic tanks. My house is linked to the Rockcliffe school sewage system. Therefore, attempts to link the existing system will come at a cost to install new pipework to bypass the existing system serving the houses to the east of Lonning Foot. Scrap the plans for Rockcliffe East and it's alternatives. The costs for drainage, sewage, roads electricity, gas and water supplies to Rockcliffe East will make the cost of these new houses prohibitive. Any need for low cost houses can be incorporated at Crindledyke Farm development.

Response

This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:

"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			
0244	Comment	Policy	269	ROCK1
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	<p>This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:</p> <p>"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.</p> <p>Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".</p>			
Proposed Change	This site has been deleted as the preferred option for Rockcliffe.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0054	Comment	Policy	269	ROCK1
031		National Grid		A006
Detail	<p>The proposed housing site at Rockcliffe East (Rock 1) is identified as being crossed / in close proximity to National Grid's high voltage overhead transmission line - T line - 400kV route from Harker substation in Carlisle to Dumfries and Galloway in Scotland.</p> <p>National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments. National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>Further information given regarding safety clearances and 'A Sense of Place' guidance.</p>			
Response	<p>This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:</p> <p>"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.</p> <p>Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".</p>			
Proposed Change	<p>Site deleted from Policy 19 as a preferred allocation for housing development.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0672	Objection	Policy	269	ROCK1
144/16	Mrs Louise Robertson			
Detail	<p>I object to the siting of the earmarked plot and the number of houses proposed. This plot is at the end of a narrow lane and is already used inappropriately as it is. Roads to and from the site are not suitable, even if this was made access only it would still lead to problems. There is already concern re flooding from the water way that runs along side the proposed site and the problems this causes. To exasperate the problem will lead to problems for existing properties opposite the plot. Please find an alternative site that does not cause danger to the road user or will cause flooding to other properties.</p>			
Response	<p>This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:</p> <p>"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.</p> <p>Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".</p>			
Proposed Change	<p>Site deleted from Policy 19 as a preferred allocation for housing development.</p>			
0882	Support	Policy	269	ROCK1
184	Mrs Andrea McCallum	Clerk to Rockcliffe Parish Council		
Detail	<p>Rockcliffe P C resolved to support the development of area ROCK1. However the following comments and reservations to be noted:</p> <ul style="list-style-type: none"> - the planned density of the site (20 properties) is considered too high; - the availability of school places provision must be determined and addressed prior to the development being built; - no main foul drainage system available; - concerns over the existing road infrastructure and its ability to take additional traffic; - flooding in the area is of concern and mitigating features would need to be incorporated into the design so that other existing properties are not adversely affected; - it is requested that the incorporation of bungalows is considered, an identified housing need of the village. 			
Response	<p>This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:</p> <p>"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.</p> <p>Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".</p>			
Proposed Change	<p>Site deleted from Policy 19 as a preferred allocation for housing development.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0595	Support	Policy	269	ROCK1
127	Margaret Miller	Cumbria Housing Group		
Detail	Land at Lonning Foot, Rockcliffe: Cumbria Housing Market Group support the allocation of the site which will support delivery of affordable housing.			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			
0390	Objection	Policy	269	ROCK1
091	Mr Robert Liddell	R S Liddell Consulting Ltd		
Detail	When the area adjacent to Lonning Foot was originally hedged off by the Castletown Estate, we were advised that the intention was to develop the land for a "few bungalows that would not overlook the properties on the opposite side of the road". Page 269 of the Plan shows a much larger area designated for the building of 20 properties, presumably low cost starter homes. The Plan also says that the field is "generally flat" and not at risk of flooding. In fact the area slopes slightly in 2 directions - from the north to south and east to west. In recent times the field has been a quagmire and water cascades onto the road surface. Attempts to take a tractor onto the field via the gate opposite Croft Cottage have been unsuccessful for over 2 years, evidenced by tyre tracks at the field entrance and the failure to cut the hedges surrounding the field for over 3 years. My Main Concerns are: (headings listed here full explanations given with photographs) Surface Water Drainage; Foul Water & Sewage; Access; Reduction in Light; Property Devaluation; Local Amenities; Schooling; Alternative Developments. Solution: Abandon the plan for Rockcliffe East and the Alternatives. The cost for infrastructure - drainage, sewage, road widening, electricity, gas and water supplies to the Rockcliffe East site, will make the cost of the resultant properties prohibitive. Include any requirement for new low cost housing in the Crindledyke development.			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0186	Objection	Policy	269	ROCK1
067	Mrs Marion F Sinclair			
Detail	Field liable to flooding onto road, so soakaways for rainwater would be adding to flooding. Narrow road for extra traffic and awkward crossing over main road to Lonning Foot. Sewage a problem.			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			
0025	Objection	Policy	269	ROCK1
012	Geoff & Judith Twentyman			
Detail	We strongly object to the proposed plans for development of dwellings within the village of Rockcliffe. The access roads are not suitable to sustain an increase in traffic both the building traffic and the subsequent residential traffic ,we have a small village school which will not accommodate the extra pupils. We are presently experiencing an increase in heavy traffic around our village with Brampton Skips and BSW timber being the main contributors, sewage & other utilities may also be overwhelmed by such an increase, wild life would also suffer to some extent. We hope you reconsider your proposals.			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0433	Comment	Policy	269	ROCK1
097	Amy Heys	Environment Agency		
Detail	Relates to all allocations at Rockcliffe: These sites are both in flood zone 1 but the extent of the flood zones could be inaccurate in these areas. A flood risk assessment to ascertain the extent of the flood zone is recommended for both of these sites.			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			
0197	Objection	Policy	269	ROCK1
070	Mr R Coad			A013
Detail	We disagree with the Council's preferred option for addressing housing need and demand in Rockcliffe. It is considered that site ROCK1 (as identified on page 269 of the consultation document, is not the most suitable, achievable or deliverable site in Rockcliffe. We therefore suggest the removal of Site ROCK1 as a preferred option and replace it with our clients land (RO04) as identified on the attached plan. [REP 0198]			
Response	This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows: "I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house. Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".			
Proposed Change	Site deleted from Policy 19 as a preferred allocation for housing development.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0027	Objection	Policy	269	ROCK1
013	Mr Anthony Parrini			
Detail	<p>When the area adjacent to Lonning Foot was originally hedged off by the Castletown Estate, we were advised that the intention was to develop the land for a "few bungalows that would not overlook the properties on the opposite side of the road". Page 269 of the Plan shows a much larger area designated for the building of 20 properties, presumably low cost starter homes.</p> <p>The Plan also says that the field is "generally flat" and not at risk of flooding. In fact the area slopes slightly in 2 directions - from the north to south and east to west. In recent times the field has been a quagmire and water cascades onto the road surface. Attempts to take a tractor onto the field via the gate opposite Croft Cottage have been unsuccessful for over 2 years, evidenced by tyre tracks at the field entrance and the failure to cut the hedges surrounding the field for over 3 years.</p> <p>My Main Concerns are: (headings listed here full explanations given with photographs) Surface Water Drainage; Foul Water & Sewage; Access; Reduction in Light; Property Devaluation; Local Amenities; Schooling; Alternative Developments.</p> <p>Solution: Abandon the plan for Rockcliffe East and the Alternatives. The cost for infrastructure - drainage, sewage, road widening, electricity, gas and water supplies to the Rockcliffe East site, will make the cost of the resultant properties prohibitive. Include any requirement for new low cost housing in the Crindledyke development.</p>			
Response	<p>This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:</p> <p>"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.</p> <p>Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".</p>			
Proposed Change	<p>Site deleted from Policy 19 as a preferred allocation for housing development.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0034	Objection	Policy	269	ROCK1
016	Mrs E A Hay			
Detail	<p>The statement states that the field is "generally flat" and not at risk of flooding. This field is always wet and you will from the photographs (enclosed) just how it streams out of this field into my property. It gushes out of the same field and further up the road to Todhills, where it gathers like a lake before pouring onto the road. Main concerns (further comments made) are: Surface Water Drainage; foul Water and Sewage; Access; Reduction in Light; Property Devaluation; Local Amenities; Schooling; alternative Developments (Crindledyke).</p> <p>Want removal of the preferred allocation at Rockcliffe along with the alternative. The cost of infrastructure - drainage, sewage, road widening, electricity, gas and water supplies to the Rockcliffe East site will make the cost of the resultant properties prohibitive. Include any requirement for low cost houses in the Crindledyke Farm development.</p>			
Response	<p>This site has been deleted from the allocations on the advice of County Highways that the access issues are unlikely to be resolved. Initial advice regarding the site is as follows:</p> <p>"I would prefer to see no further development off the U1070 as the road is substandard and has an awkward junction off the C1016. It's unfortunate given most of the ribbon development that has occurred along this road is relatively recent that the road was not improved, but that is no longer a realistic possibility given it would require acquisition of the frontages and improvements to the junction likely acquisition and demolition of a house.</p> <p>Thus I would oppose anything other than further ribbon development of the small paddock with properties with direct access and having the road widened to form a service lay-by along the frontage. This would take the extent of the village development to a logical conclusion on both sides of the road".</p>			
Proposed Change	<p>Site deleted from Policy 19 as a preferred allocation for housing development.</p>			
0883	Objection	Policy	269	Rockcliffe Alternative
184	Mrs Andrea McCallum	Clerk to Rockcliffe Parish Council		
Detail	<p>RO 04 - Rockcliffe P C resolved to object to the development of this site for the reasons outlined below:</p> <ul style="list-style-type: none"> - concerns over the existing road infrastructure; access to the site being considered dangerous; - flooding and drainage problems being experienced in this area. 			
Response	<p>This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0187	Objection	Policy	269	Rockcliffe Alternative
067	Mrs Marion F Sinclair			
Detail	Bad corner and near school for extra traffic. May mean extra pupils and I understand the school is full now.			
Response	This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.			
Proposed Change	No change to Plan in response to this comment.			
0196	Comment	Policy	269	Rockcliffe Alternative
070	Mr R Coad			A013
Detail	<p>Land North of Rockcliffe School, Rockcliffe [SHLAA RO 04]</p> <p>The site is 1.0 hectares in size and can be viewed as two potential development sites. Please see the attached location plan for reference.</p> <p>The site is within a single ownership and is currently used for grazing. It is considered suitable for residential development as it is located adjacent to the existing built up form of Rockcliffe and is in close proximity to a range of services and facilities. It is considered that high quality sensitively designed properties would not have an adverse impact on the existing settlement and would offer a greater housing choice for the local residents.</p> <p>It has no physical or other constraints with regard to its future development for housing. The site has also been subject to support for future development by Carlisle City Council. Please see below for further information. The Local Planning Authority stated in a letter to Smiths Gore (December 2009) that there is a need to sustain rural villages which already benefit from a range of local services and that the site should be put forward as a potential housing site during the preparation of the LDF / Local Plan (please see the attached letter for reference). We therefore submitted the site, through the 'Call for Sites' process in January 2011.</p> <p>The Council's SHLAA Site Assessment (2012) stated that the site is a "Greenfield site near Rockcliffe School. Site is suitable, available and should be economically viable being located in a desirable location. Some constraints regarding access and flood risk are present, but these should not prevent development from taking place. This site is therefore considered deliverable".</p> <p>Subsequent to the comments made during the SHLAA assessment, discussions were held with Cumbria County Council with regard to potential highways issues. The County Council responded stating that an adoptable standard access to the site to serve residential development is achievable and acceptable, in principle. Further information can be provided on this, if deemed necessary by the Council.</p> <p>In addition, insofar as our contact at Cumbria County Council is aware, the flooding issues to which the Proposal's Map refers arose due to lack of dredging by riparian owners downstream of the culvert beneath the C1016 Rockcliffe - Floriston Road. These issues were resolved back in 2007/8.</p> <p>Therefore, following discussion with both the Planning Policy Officers and Development Management Officers, development of the site has been identified as being acceptable, in principle, by Carlisle City Council.</p> <p>Consequently, the site is suitable, accessible, achievable, available and deliverable for residential development and should be allocated for housing development during the plan period.</p>			
Response	This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1088	Comment	Policy	269	Rockcliffe Alternative
194	Michael Barry	Cumbria County Council		
Detail	RO01: No significant H&T issues			
	1:100 year Surface water mapping predicts there a no areas affected by surface water flooding			
	The site is approximately 500m north of an intensively used employment site (Kingmoor Park Rockcliffe) with a large number of waste uses that could impact the amenity of dwellings in this location.			
Response	Comments noted, and included in assessment process for sites.			
Proposed Change	No change to Plan in response to this comment.			
0391	Comment	Policy	269	Rockcliffe Alternative
091	Mr Robert Liddell	R S Liddell Consulting Ltd		
Detail	My Main Concerns are the same as Rep No 0390 except for "reduction in light": (headings listed here full explanations given with photographs) Surface Water Drainage; Foul Water & Sewage; Access; Property Devaluation; Local Amenities; Schooling; Alternative Developments. Solution: The cost for infrastructure - drainage, sewage, road widening, electricity, gas and water supplies to the this alternative site, will make the cost of the resultant properties prohibitive. Include any requirement for new low cost housing in the Crindledyke development.			
Response	This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.			
Proposed Change	No change to Plan in response to this comment.			
0028	Objection	Policy	269	Rockcliffe Alternative
013	Mr Anthony Parrini			
Detail	My Main Concerns are the same as Rep No 0027 except for "reduction in light": (headings listed here full explanations given with photographs) Surface Water Drainage; Foul Water & Sewage; Access; Property Devaluation; Local Amenities; Schooling; Alternative Developments. Solution: The cost for infrastructure - drainage, sewage, road widening, electricity, gas and water supplies to the this alternative site, will make the cost of the resultant properties prohibitive. Include any requirement for new low cost housing in the Crindledyke development.			
Response	This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0245	Comment	Policy	269	Rockcliffe Alternative
043	Nigel Winter	Stagecoach		
Detail	RO 04 - Developing the site will support sustainable passenger transport.			
Response	This site is proposed as a preferred options allocation for housing development, in replacement for Rock1.			
Proposed Change	Site identified as preferred options allocation.			
0035	Comment	Policy	269	Rockcliffe Alternative
016	Mrs E A Hay			
Detail	My objection to RO 04 is the same as ROCK1 (representation no 0034) with the exception of the matter of "Reduction in Light". This field also floods and the ditch that the owners dug out to compensate for the inadequate field drain they inserted isn't working because it has never been cleaned out and is full of weeds including marsh reeds. If they followed the original course the water would of found its way much quicker than tackling an S bend. (diagram attached)			
	Want removal of RO 04 along with ROCK1. The cost of infrastructure - drainage, sewage, road widening, electricity, gas and water supplies to the Rockcliffe East site will make the cost of the resultant properties prohibitive. Include any requirement for low cost houses in the Crindledyke Farm development.			
Response	This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.			
Proposed Change	No change to Plan in response to this comment.			
0884	Objection	Policy	269	Rockcliffe Alternative
184	Mrs Andrea McCallum	Clerk to Rockcliffe Parish Council		
Detail	RO 01 - Rockcliffe P C resolved to object to the development of this site for the reasons outlined below: - concerns over the existing road infrastructure; possible access from and to the highway from the site being considered dangerous; - flooding and drainage problems being experienced in this area.			
Response	The site is shown as an alternative option, not a preferred option for development. Such sites are shown in the Plan so that the consultation process shows the range of sites that were assessed. If new information comes forward that shows how any constraints on these sites can be addressed, then the sites will be reconsidered.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1089	Comment	Policy	269	Rockcliffe Alternative
194	Michael Barry	Cumbria County Council		
Detail	RO04: No significant H&T issues. Development of this site could provide a new link to Lonning Foot and site ROCK1.			
	Approximately 10-15% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding.			
	1km south of Hesperin Wood Landfill Site and Waste Mgmt Centre. 1km north of N-West Recycling Waste world. Should be sufficient distance/buffer to ensure no amenity impacts.			
Response	This site is an alternative for Rockcliffe, and has not been selected as an allocation for development. The site is subject to an outline application for development, 13/0776. The site allocation will be reviewed following the decision on the planning application.			
Proposed Change	No change to Plan in response to this comment.			
0980	Objection	Policy	270	SCOT1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	This site has no access and may not become deliverable and the site is NOT generally flat as stated.			
Response	The site has been deleted as a preferred allocation for housing development. The site promoter had previously indicated that there was some degree of certainty over potential access arrangements through the demolition of a property on Scotby Road. However, no further information has come forward, and due to this lack of evidence, the Council is not satisfied that adequate access arrangements can be made.			
Proposed Change	Site deleted as a preferred allocation for housing development in Policy 19.			
0246	Comment	Policy	270	SCOT1
043	Nigel Winter	Stagecoach		
Detail	Given SC 02 (alternative) development this site may support sustainable transport.			
Response	Comments are noted. The Highways Authority has indicated that access is dependent on the demolition of a house, and that if this can be achieved there are no major highways and transport issues. However, the site has been deleted as a preferred allocation for housing development. The site promoter had previously indicated that there was some degree of certainty over potential access arrangements through the demolition of a property on Scotby Road. However, no further information has come forward, and due to this lack of evidence, the Council is not satisfied that adequate access arrangements can be made.			
Proposed Change	SCOT1 deleted as a preferred allocation for housing development in Policy 19.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0429	Comment	Policy	270	SCOT1
097	Amy Heys	Environment Agency		
Detail	Relates to all allocations in Scotby: Surface water drainage from these sites will need to be constrained to a Greenfield runoff rate.			
Response	The site has been deleted as a preferred allocation for housing development. The site promoter had previously indicated that there was some degree of certainty over potential access arrangements through the demolition of a property on Scotby Road. However, no further information has come forward, and due to this lack of evidence, the Council is not satisfied that adequate access arrangements can be made.			
Proposed Change	SCOT1 deleted as a preferred allocation for housing development in Policy 19.			
1090	Comment	Policy	270	Scotby Alternative
194	Michael Barry	Cumbria County Council		
Detail	SCo2: No access permissible from A69. Potentially require a bus service extension into the site. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.			
	1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding			
	No minerals or waste constraints or planning issues			
Response	Comments noted and used in site selection process. The sites are shown as alternative options, not a preferred option for development. Such sites are shown in the Plan so that the consultation process shows the range of sites that were assessed. If new information comes forward that shows how any constraints on these sites can be addressed, then the sites will be reconsidered. Following the need to delete Scot 1 due to inability to access the site, a small part of Sco 2 (north western corner of the site) has been allocated as a replacement. This site is considered to have less impact on the landscape, and have better access, than Sco9.			
Proposed Change	North Western corner of Sco2 allocated for the development of 44 houses.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0040	Comment	Policy	270	Scotby Alternative
020		Essar Oil (UK) Ltd		A005
Detail	<p>SCo2: we have written previously to the Council 27/06/12 & 27/11/12 in respect of the SHLAA. We drew your attention to a number of proposed sites which were in close proximity to the North Western Ethylene Pipeline, and one where the pipeline ran through the site at Scotby SC 02. The Council's response was that assessment in respect of the pipeline would be made when it came to selecting options for the Local Plan allocations.</p> <p>Whilst this site is not a preferred option it is an 'Alternative' and there is no mention of the pipeline as a potential constraint in the site assessment either which would be useful if for example consideration was given to extending/altering the site boundary at a later stage in the Plan process.</p>			
Response	<p>The preferred allocation for Scotby, SCOT1 has had to be deleted due to the inability to overcome access constraints. As such an alternative site has been selected, which comprises the north western corner of SCo2, for the provision of 44 houses. The site assessment notes which will accompany the site when the consultation takes place will show the North Western Ethylene Pipeline, and identify it as a constraint on any future expansion of the site.</p>			
Proposed Change	<p>North western corner of SCo2 allocated for 44 houses.</p>			
0981	Comment	Policy	270	Scotby Alternative
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	<p>SC 02 -is twice the size of SCOT 1/SCo9 combined and the location does not constitute infill, this is more of a satellite to the village itself linking to Aglionby. SCo9 would be the preferred choice, all the land and access is owned is the developer making it immediately deliverable. The site would constitute a natural infill opportunity.</p>			
Response	<p>The sites are shown as alternative options, not a preferred option for development. Such sites are shown in the Plan so that the consultation process shows the range of sites that were assessed. If new information comes forward that shows how any constraints on these sites can be addressed, then the sites will be reconsidered. Following the need to delete Scot 1 due to inability to access the site, a small part of SCo 2 (north western corner of the site) has been allocated as a replacement. This site is considered to have less impact on the landscape, and have better access, than SCo9.</p>			
Proposed Change	<p>North western corner of SCo9 allocated for the development of 44 houses.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1091	Comment	Policy	270	Scotby Alternative
194	Michael Barry	Cumbria County Council		
Detail	<p>SCog: Access arrangements will need to be clarified as the site is effectively landlocked and as such it would appear that development depends on ability to form a new access by demolishing existing property.</p> <p>Site has poor accessibility and would potentially require a developer contribution towards community transport provision.</p> <p>Approximately 10-15% of the site is predicted by Surface Water Mapping to be at risk of surface water flooding. An ordinary watercourse also runs through the site</p> <p>No minerals or waste constraints or planning issues</p>			
Response	<p>Comments noted and used in site selection process.</p> <p>The site is shown as an alternative option, not a preferred option for development. Such sites are shown in the Plan so that the consultation process shows the range of sites that were assessed. If new information comes forward that shows how any constraints on these sites can be addressed, then the sites will be reconsidered.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			
0248	Comment	Policy	270	Scotby Alternative
043	Nigel Winter	Stagecoach		
Detail	<p>SC 09 - Does not support sustainable passenger transport and cannot be easily served efficiently or sustainably.</p>			
Response	<p>This is an alternative option and has not been selected as a preferred option housing allocation.</p>			
Proposed Change	<p>No change to policy in response to this comment.</p>			
0247	Comment	Policy	270	Scotby Alternative
043	Nigel Winter	Stagecoach		
Detail	<p>SC 02 - Developing the site will support sustainable passenger transport.</p>			
Response	<p>This is an alternative option and has not been selected as a preferred option housing allocation.</p>			
Proposed Change	<p>No change to policy in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0084	Site Proposal	Policy	271	WARW1
034	Lucy Adamski			A008
Detail	<p>[Link to Rep No 0075] Explicit support for the inclusion of the land at Warwick Bridge (Warw1) as a housing allocation. [Map attached]</p> <p>Given that this site relates very well to the existing settlement pattern of the village, provides a logical extension to support local services et al, does not suffer from any significant risk of flooding, and is the only proposed allocation for Warwick Bridge; allied to the findings of the Preferred Options Sustainability Appraisal, it is considered that the opportunity to incorporate a second phase allocation, with a yield of circa 35 additional new homes, would make eminent sense. The parcel of land in question is indicated on the plan that is appended to this submission and its inclusion is therefore encouraged as Warw1a.</p> <p>The inclusion of this second phase allocation as promoted would not give rise to any additional land use matters above and beyond those that have already been considered in the Sustainability Appraisal but would provide controlled additional capacity, choice and flexibility for both market and affordable new homes for a range of lifestyle requirements in accordance with the central thrust of the NPPF in a location that the Plan considers to be sustainable.</p> <p>The proximity of the adjacent Little Corby Hall has been taken into consideration hence the proposal that proposed allocation Warw1a has a modest number of new homes (circa 35) so as to allow an appropriate spatial relationship between the new housing and the hall.</p>			
Response Proposed Change	See reponse to representation 0075 - Chapter 5; Policy 19			
0919	Objection	Policy	271	WARW1
191	Ken Hind	Clerk to Hayton Parish Council		
Detail	<p>Hayton Parish Council had received verbal and written objections to any proposal to build on site WARW1 as shown in the Draft Carlisle District Local Plan 2015-2030. Commonly known as land adjacent to Hurley Road, Little Corby.</p> <p>The objections were endorsed by the Parish Council and also that in the event of this going ahead access must be from Little Corby Road only.</p> <p>NB: The Parish council would request to reserve the right to expand on the objection later [meeting 16th October]</p>			
Response	The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate. There are no proposals to create though roads or open the cul de sac between the Hurley Road Estate and the proposed new housing site.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
o885	Comment	Policy	271	WARW1
185	Cllr William Graham	City Councillor for Hayton Ward		
Detail	The residents noted that in recent years all the housing development and village expansion that has been given in recent years has taken place on the Corby Hill side of the A69. The feeling among the residents was that it would now be timely and appropriate for any further village expansion to take place on opposite side of this trunk road.			
Response	It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A69. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites.			
Proposed Change	No change to Plan in response to this objection.			
o979	Comment	Policy	271	WARW1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	This greenfield site relates well to the existing settlement pattern of the village and provides a logical extension to Corby Hill. However this land is not flat and does not suffer from any significant risk of flooding. There are known highway capacity issues in and around Little Corby Road/A69 junction. Which will need to be addressed as part of any new development proposal. There is no access other than from Little Corby Road, the preferred site would be Hurley road to the East, as it lends itself to extending the estate, the streets were built with the roads terminating allowing future development.			
Response	Of the three sites in Warwick Bridge, this site is considered to have the best relationship to the built form of the edge of the village. The residents in Hurley Road that have responded to the consultation are strongly against any further traffic coming through the estate. The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate. There are no proposals to create though roads or open the cul de sac between the Hurley Road Estate and the proposed new housing site.			
Proposed Change	No change to Plan in response to comment.			

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

0549	Objection	Policy	271	WARW1
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118	Joan Tiffin			
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Detail

I object to this development because this is good agricultural grazing land and should be left so. Further development would disturb the birds and wildlife already having to struggle to survive. It has been stated that this land is 'flat', this is not so, there is a definite slope from the joining field down to the fences of the existing homes and gardens, quite often there is pools of water collected in the dips and flow over into my back garden. If this site had houses and roadways built on it the rain water would not be able to soak through the concrete and not soak away. There is two mature British trees, not sure what kind they are (oak & sycamore) I think which are protected by tree preservation. If any more vehicles are allowed on these narrow roads it will increase the danger to children pedestrians, cyclists and motor vehicles. These are some of the reasons that I strongly object to further building on Hurley Rd, Little Corby, Corby Hill.

Response

The Council's agenda is pro-growth, and there is evidence in the HNDS that more houses will be needed throughout the District to meet housing need. The population of the district is divided approximately 30% in the rural area and 70% in the City. As such, 30% of the housing need is to be met in the rural areas. Warwick Bridge is considered a sustainable location for development as it has a good range of local services and facilities. With regards to the comments about impact of the development on other infrastructure such as the school, highways etc, the site selection process has included consultation with the Education Authority, Highways Authority, Clinical Commissioning Group etc. This dialogue has highlighted any issues which would be a barrier to development. There is currently spare capacity at the primary school. The Highways Authority has indicated that a Transport Statement will be required to support any development proposal. The Transport Statement will generally include an audit and appraisal of the following:

Existing conditions

- Existing site information
- Baseline traffic data
- Existing site use and means of access

Proposed Development

- Proposed land use and scale of development
- Proposed means of access
- Person trip generation and distribution of trips by mode of transport
- A qualitative and quantitative description of the proposed travel characteristics of the proposed development
- Proposed improvements to site accessibility by sustainable modes of travel
- Proposed parking and servicing strategy
- Residual vehicle trip impact
- Transport implications of construction traffic (if there are specific local difficulties identified)
- If the development site has a current use or an extant planning permission, the net level of change in traffic flows that might arise from the development is calculated and considered.

Pedestrian linkages via Hurley Road would also be expected in order to provide safe walking routes to local services.

The Plan makes provision for housing for the next 15 years. This is the only site that has been allocated in Warwick Bridge/Corby Hill, so would not act as a precedent for the release of further sites.

The Council does not build houses. The site is in private ownership and would be developed by a private developer. There would be a requirement for 30% of the housing to be affordable.

The EA has raised no objections to the allocation. They have stated that surface water drainage from this site will need to be constrained to a greenfield runoff rate, and recommend that any developer closely considers the access and egress implications of flood risk on the Little Corby Road.

It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A69. However, the majority of the housing is on the

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

northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites.

Proposed Change
 No change to Plan in response to this objection.

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

0133	Objection	Policy	271	WARW1
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054	Mr Albert Braid			
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Detail

Objecting because:

1. Unnecessary potential use of a Greenfield site for housing
2. Have all the brownfield sites in Carlisle been fully explored and rated.
3. Is protected status/granted to trees & woodland within the site?
4. Land stated to be flat & no significant risk of flooding - it isn't flat and any discussion is irrelevant. A field and soil is natural drainage - houses with concrete and asphalt roads isn't.
5. Could local medical services and school cope with the extra people?
6. The council policy to divert traffic off the A69 - this could be contrary to that.
7. If granted this could open the gates for more fields being granted identical status with consequent housing up to Newby East. I understand that a councillor is already pressing for another field to have this status.
8. This is farming land, now beginning to run short nationwide.
9. What sort of housing could be potentially built - private or council?
10. Any building would affect current housing values.
11. Access for emergency vehicles is currently restricted.
12. More congestion would be created.
13. Could local & Cumberland infirmary cope with additional numbers, also care homes both private and council.
14. There is already partial domestic & commercial building on the opposite side of the A69, should this not be explored before utilising other valuable Greenfield sites?

Response

There are no available brownfield sites in Warwick Bridge. The rate for developing on brownfield within the City of Carlisle has been high in recent years, and the NPPF still encourages planning policies and decisions to re-use land that has been previously developed. However, this is more difficult in the rural areas. The Council's agenda is pro-growth, and there is evidence in the HNDS that more houses will be needed throughout the District to meet housing need. The population of the district is divided approximately 30% in the rural area and 70% in the City. As such, 30% of the housing need is to be met in the rural areas. Warwick Bridge is considered a sustainable location for development as it has a good range of local services and facilities. With regards to the comments about impact of the development on other infrastructure such as the school, highways etc, the site selection process has included consultation with the Education Authority, Highways Authority, Clinical Commissioning Group etc. This dialogue has highlighted any issues which would be a barrier to development. There is currently spare capacity at the primary school. The Highways Authority has indicated that a Transport Statement will be required to support any development proposal. The Transport Statement will generally include an audit and appraisal of the following:

Existing conditions

- Existing site information
- Baseline traffic data
- Existing site use and means of access

Proposed Development

- Proposed land use and scale of development
- Proposed means of access
- Person trip generation and distribution of trips by mode of transport
- A qualitative and quantitative description of the proposed travel characteristics of the proposed development
- Proposed improvements to site accessibility by sustainable modes of travel
- Proposed parking and servicing strategy

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

- Residual vehicle trip impact
- Transport implications of construction traffic (if there are specific local difficulties identified)
- If the development site has a current use or an extant planning permission, the net level of change in traffic flows that might arise from the development is calculated and considered.

Pedestrian linkages via Hurley Road would also be expected in order to provide safe walking routes to local services.

The Plan makes provision for housing for the next 15 years. This is the only site that has been allocated in Warwick Bridge/Corby Hill, so would not act as a precedent for the release of further sites.

The Council does not build houses. The site is in private ownership and would be developed by a private developer. There would be a requirement for 30% of the housing to be affordable.

The EA has raised no objections to the allocation. They have stated that surface water drainage from this site will need to be constrained to a greenfield runoff rate, and recommend that any developer closely considers the access and egress implications of flood risk on the Little Corby Road.

Proposed Change
No change to Plan in response to this objection.

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

0673	Objection	Policy	271	WARW1
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145/17	Mr Gordon Hunter			
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Detail	<p>I have lived at 33 Hurley Road for 31 years, the property 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 the low point being 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. The bridge over the river Irthing which connects Newby East to Little Corby has a weight restriction which is being abused and the construction would attract more heavy traffic and naturally increase the traffic once the construction is complete. The field is a haven for bats, toads etc the construction would greatly affect their habitat. The road leading from Little Corby to the gate entrance at the field has a number of blind bends and high banked dykes this is not suitable for pedestrians in particular young children and mothers with prams. When I purchased the house it was stated that the field in question was a protected green belt, which was reflected with the price of the property, the proposed construction would have an effect on the market value of my property.</p> <p>The location is not fit for purpose</p>			
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Response	<p>Any new development will be assessed within the context of existing surface water flooding, to maximise opportunities to reduce existing surface water flood risk elsewhere or to create capacity in the drainage system through reducing existing runoff.</p> <p>The Highways Authority has indicated that a Transport Statement will be required to support any development proposal. The Transport Statement will generally include an audit and appraisal of the following:</p> <p>Existing conditions</p> <ul style="list-style-type: none"> •Existing site information •Baseline traffic data •Existing site use and means of access <p>Proposed Development</p> <ul style="list-style-type: none"> •Proposed land use and scale of development •Proposed means of access •Person trip generation and distribution of trips by mode of transport •A qualitative and quantitative description of the proposed travel characteristics of the proposed development •Proposed improvements to site accessibility by sustainable modes of travel •Proposed parking and servicing strategy •Residual vehicle trip impact •Transport implications of construction traffic (if there are specific local difficulties identified) •If the development site has a current use or an extant planning permission, the net level of change in traffic flows that might arise from the development is calculated and considered. <p>Pedestrian linkages via Hurley Road would also be expected in order to provide safe walking routes to local services.</p> <p>The Plan makes provision for housing for the next 15 years. This is the only site that has been allocated in Warwick Bridge/Corby Hill, so would not act as a precedent for the release of further sites.</p> <p>The Council does not build houses. The site is in private ownership and would be developed by a private developer. There would be a requirement for 30% of the housing to be affordable.</p> <p>The EA has raised no objections to the allocation. They have stated that surface water drainage from this site will need to be constrained to a greenfield runoff rate, and recommend that any developer closely considers the access and egress implications of flood risk on the Little Corby Road.</p> <p>The land is not designated as green belt. The effect of development on house prices is not a material consideration.</p>			
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Proposed Change	No change to Plan in response to this objection.			
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RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0446	Objection	Policy	271	WARW1
101	Mr John Lumpton			
Detail	<p>The land suffers from the disadvantages:</p> <ol style="list-style-type: none"> 1. Low lying site - could suffer from drainage/flooding problems 2. Access to site is a very narrow country road which would require substantial upgrading to allow for the considerable increase in traffic. 3. The particular section of road has had several accidents in recent year - emphasising concerns in para 2. 			
Response	<p>The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate. There are no proposals to create through roads or open the cul de sac between the Hurley Road Estate and the proposed new housing site.</p> <p>It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A69. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites. The Environment Agency are consulted throughout the site selection process and have indicated that surface water drainage from this site will need to be constrained to a greenfield runoff rate.</p>			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0830	Objection	Policy	271	WARW1
164/39	Mrs Jane Hodgson			
Detail	<p>small country road, already busy with large housing estate and another close by. Road used as link between 2 main routes into Carlisle. Publicity about this has been very poor. First residents knew about proposals was when local councillor delivered leaflets around the area. Only knew that there was an opportunity to respond on-line when local councillor called today with details of website! Consultation period has been open since July and closes on Monday!! How many others do not realise what is going on!!</p>			
Response	<p>The Highways Authority has been consulted on all proposed site allocations in the Local Plan. The Authority has not raised any major concerns regarding this site, other than proposing that footpath links and cycle ways are created within the development and linked through to the Hurley Road estate. There are no proposals to create though roads or open the cul de sac between the Hurley Road Estate and the proposed new housing site.</p> <p>It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A69. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites. The Environment Agency are consulted throughout the site selection process and have indicated that surface water drainage from this site will need to be constrained to a greenfield runoff rate.</p> <p>The draft Local Plan was open for public consultation for 7 weeks. A variety of ways of reaching the wider community included library drop-in sessions, local newspapers, parish councils, a stall in the city centre etc.</p>			
Proposed Change	No change to Plan in response to this comment.			
0249	Comment	Policy	271	WARW1
043	Nigel Winter	Stagecoach		
Detail	Does not support sustainable passenger transport and cannot be easily served efficiently or sustainably.			
Response	<p>Comments noted. However, the development of the site could lead to the creation of attractive and safe walking routes through the adjacent Hurley Road housing estate, to nearby bus stop. There is an area of open space between 15 and 17 Hurley Road which could accommodate a linkage. The Highways Authority has indicated that a pedestrian linkage would be essential, together with improved pedestrian environment along Little Corby Road. In addition a Transport Statement and Travel Plan Statement would be required.</p>			
Proposed Change	No change to policy in response to this comment.			

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

0134	Objection	Policy	271	WARW1
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055	Alison Fyfe			
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Detail	<p>I am actually writing about WBO2 and the land between OC34 these two fields were left for the purpose of expanding Hurley Road if need but as the council care not about the locals and only for the money that they can get for themselves and business that they are involved in this surprises me not so if you can actually find someone who can take the time to research this you would have found out, the road past the Haywain is unsuitable for a great amount of traffic so I suppose that you will be charging the locals extra the ruination of another road . Come on guys use your common sense and see what is actually more viable and accessible</p>			
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Response	<p>Objections have been received from residents in Hurley Road to any further expansion of the estate onto adjoining land, using existing Hurley Road cul de sac. The Highways Authority has indicated that a Transport Statement will be required to support any development proposal. The Transport Statement will generally include an audit and appraisal of the following:</p> <p>Existing conditions</p> <ul style="list-style-type: none"> •Existing site information •Baseline traffic data •Existing site use and means of access <p>Proposed Development</p> <ul style="list-style-type: none"> •Proposed land use and scale of development •Proposed means of access •Person trip generation and distribution of trips by mode of transport •A qualitative and quantative description of the proposed travel characteristics of the proposed development •Proposed improvements to site accessibility by sustainable modes of travel •Proposed parking and servicing strategy •Residual vehicle trip impact •Transport implications of construction traffic (if there are specific local difficulties identified) •If the development site has a current use or an extant planning permission, the net level of change in traffic flows that might arise from the development is calculated and considered. 			
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Proposed Change	No change to Plan in response to this objection.			
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RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0653	Objection	Policy	271	WARW1
138/10	Mrs Jill Ridley			
Detail	<p>I fail to understand why further building is proposed away from the local shops, doctor, school and recreational facilities. This must be accessed across a busy main road. Access to this site would be from a narrow B road, which already quite busy and there have already been numerous accidents close to the land as a result of the narrow road and sharp bends in the road.</p> <p>I think consideration should be given to land behind the local garage or behind Chapel Close. This second option would be closer to the local primary school. Both these options would avoid children, families and elderly people having to cross the busy A69.</p>			
Response	<p>It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A69. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites.</p>			
Proposed Change	<p>No change to Plan in response to this objection.</p>			

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

0658	Objection	Policy	271	WARW1
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139/11	Mrs Yvonne Petry			
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Detail

I think the idea of building on land at the back of Hurley road is outrageous, all amenities are quite a walk away. Little Corby is big enough without adding extra houses. The roads around this side of the village i.e. little Corby road, Hurley road, and the Haywain hill are congested enough with parked cars without adding extra traffic. We are heading into the countryside so lots of tractors pass by little Corby road heading up to Newby this is a very dangerous road when meeting large vehicles also narrow and vehicles meet damage houses close to the road. I seriously think and if anybody was to look I think the other side of the A6g would be much more suitable for amenities and less traffic congestion.

Not to build on land adjacent to Hurley Road Little Corby but move to other side of the A6g Corby Hill Warwick Bridge not Little Corby village

Response

The Council's agenda is pro-growth, and there is evidence in the HNDS that more houses will be needed throughout the District to meet housing need. The population of the district is divided approximately 30% in the rural area and 70% in the City. As such, 30% of the housing need is to be met in the rural areas. Warwick Bridge is considered a sustainable location for development as it has a good range of local services and facilities. With regards to the comments about impact of the development on other infrastructure such as the school, highways etc, the site selection process has included consultation with the Education Authority, Highways Authority, Clinical Commissioning Group etc. This dialogue has highlighted any issues which would be a barrier to development. There is currently spare capacity at the primary school. The Highways Authority has indicated that a Transport Statement will be required to support any development proposal. The Transport Statement will generally include an audit and appraisal of the following:

Existing conditions

- Existing site information
- Baseline traffic data
- Existing site use and means of access

Proposed Development

- Proposed land use and scale of development
- Proposed means of access
- Person trip generation and distribution of trips by mode of transport
- A qualitative and quantitative description of the proposed travel characteristics of the proposed development
- Proposed improvements to site accessibility by sustainable modes of travel
- Proposed parking and servicing strategy
- Residual vehicle trip impact
- Transport implications of construction traffic (if there are specific local difficulties identified)
- If the development site has a current use or an extant planning permission, the net level of change in traffic flows that might arise from the development is calculated and considered.

Pedestrian linkages via Hurley Road would also be expected in order to provide safe walking routes to local services.

The Plan makes provision for housing for the next 15 years. This is the only site that has been allocated in Warwick Bridge/Corby Hill, so would not act as a precedent for the release of further sites.

The Council does not build houses. The site is in private ownership and would be developed by a private developer. There would be a requirement for 30% of the housing to be affordable.

The EA has raised no objections to the allocation. They have stated that surface water drainage from this site will need to be constrained to a greenfield runoff rate, and recommend that any developer closely considers the access and egress implications of flood risk on the Little Corby Road.

It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A6g. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
		middle of the A69. Whilst potential housing sites have been assessed on the southern side of the A69, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites.		
Proposed Change	No change to Plan in response to this objection.			

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

o66g	Objection	Policy	271	WARW1
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143/15	Mr Ian Fyfe			
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Detail	<p>The Site at WARW1 is not suitable for the development proposed because there is no provision for direct access to the A6g. Any traffic generated would be forced onto Little Corby Road which is a narrow and winding country lane.</p> <p>A better proposition would be the field adjacent to the A6g which also abuts the three cul-de-sacs in Hurley Road. This would allow access in both directions with minimal alteration to the existing road layout.</p>			
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Response	<p>The Council's agenda is pro-growth, and there is evidence in the HNDS that more houses will be needed throughout the District to meet housing need. The population of the district is divided approximately 30% in the rural area and 70% in the City. As such, 30% of the housing need is to be met in the rural areas. Warwick Bridge is considered a sustainable location for development as it has a good range of local services and facilities. With regards to the comments about impact of the development on other infrastructure such as the school, highways etc, the site selection process has included consultation with the Education Authority, Highways Authority, Clinical Commissioning Group etc. This dialogue has highlighted any issues which would be a barrier to development. There is currently spare capacity at the primary school. The Highways Authority has indicated that a Transport Statement will be required to support any development proposal. The Transport Statement will generally include an audit and appraisal of the following:</p>			
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Existing conditions

- Existing site information
- Baseline traffic data
- Existing site use and means of access

Proposed Development

- Proposed land use and scale of development
- Proposed means of access
- Person trip generation and distribution of trips by mode of transport
- A qualitative and quantitative description of the proposed travel characteristics of the proposed development
- Proposed improvements to site accessibility by sustainable modes of travel
- Proposed parking and servicing strategy
- Residual vehicle trip impact
- Transport implications of construction traffic (if there are specific local difficulties identified)
- If the development site has a current use or an extant planning permission, the net level of change in traffic flows that might arise from the development is calculated and considered.

Pedestrian linkages via Hurley Road would also be expected in order to provide safe walking routes to local services.

The Plan makes provision for housing for the next 15 years. This is the only site that has been allocated in Warwick Bridge/Corby Hill, so would not act as a precedent for the release of further sites.

The Council does not build houses. The site is in private ownership and would be developed by a private developer. There would be a requirement for 30% of the housing to be affordable.

The EA has raised no objections to the allocation. They have stated that surface water drainage from this site will need to be constrained to a greenfield runoff rate, and recommend that any developer closely considers the access and egress implications of flood risk on the Little Corby Road.

It is recognised that many of the services which lie within Warwick Bridge are located on the southern side of the A6g. However, the majority of the housing is on the northern side. There is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A6g. Whilst potential housing sites have been assessed on the southern side of the A6g, and on the outskirts of the village along the road to Heads Nook, the landscape impact, and the impact of development on the listed buildings at Warwick Mill Business Village, (High Buildings and The Mill) have ruled out these sites.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
Proposed Change	No change to Plan in response to this objection.			
0430	Comment	Policy	271	WARW1
097	Amy Heys	Environment Agency		
Detail	Surface water drainage from this site will need to be constrained to a Greenfield runoff rate. We recommend that any developer closely considers the access and egress implications of flood risk on Little Corby Road.			
Response	Comments noted and will be integrated into site appraisal information.			
Proposed Change	No change to Plan in response to this comment.			
0982	Comment	Policy	272	WETH1
193	Sue Tarrant	Clerk to Wetheral Parish Council		
Detail	No objections however the village infrastructure needs to improve before more houses on this scale are built i.e. New school in the village, foul water, both sewers and natural run off.			
Response	Comments noted. There is continued dialogue with the Education Authority, EA and UU throughout the site selection and delivery process.			
Proposed Change	No change to Plan in response to this comment.			
0154	Objection	Policy	272	WETH1
062		Church Commissioners for England	A013	
Detail	We disagree with the Council's preferred option for addressing housing need and demand in Wetheral. It is considered that site WETH1 is not the most suitable, achievable or deliverable site in Wetheral. The SHLAA, as referred to in paragraphs 5.6, 5.7 and 5.11 of the document has not been updated recently (within the last 5 years since the last 'Call for Sites' exercise was fully undertaken) and it is therefore considered that out of date evidence is influencing the Local Plan. Furthermore, Site WETH1 relies on adjacent landowners land to address drainage and other physical constraints / issues associated with development. We therefore suggest the removal of Site WETH1 as a preferred option and replace it with our clients land as identified [see rep no 0155]			
Response	WETH1 remains in the site as a preferred option. However, the site size and yield has been reduced by approx a half, and land on the opposite side of the B6263 south of Ashgate Lane has also been identified as a preferred option for housing for an indicative yield of 50.			
Proposed Change	Site allocated for 50 houses.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0427	Comment	Policy	272	WETH1
097	Amy Heys	Environment Agency		
Detail	Relates to all allocations in Wetheral : Surface water drainage from these sites will need to be constrained to a Greenfield runoff rate.			
Response	Comments noted. Continued dialogue will be sought with EA over site selection and delivery process.			
Proposed Change	No change to Plan in response to this comment.			

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

0288	Objection	Policy	272	WETH1
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077	Mr Alan Hubbard	National Trust		
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Detail

National Trust's specific concern relates to the proposed allocation of site WETH1 for 98 dwellings. In the context of the general concerns set out above it is unclear that there is a requirement for 98 houses in Wetheral to meet 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, i.e. those with greater job opportunities closer to hand, better access to retail facilities and a primary school. It is also noted that Wetheral has been the subject of several applications in the last twelve months for new housing developments within the built up area, some have been approved and others are pending decision, that provide opportunities to assist in meeting local needs. It is reasonable to assume that similar opportunities, including through infill and redevelopment, will occur over the plan period (indeed Policy 20 provides for this). The Council's last assessment (SHLAA consultation December 2010) was that "up to 40% of this site (now referred to as WETH1) has potential for housing development". It is unclear how the other 60% of the 3.49 hectares site has changed since that time such that it is also now considered suitable for allocation. That particular concern regarding the suitability of the whole site is the absence of any published assessment of the characteristics of the site and its surroundings – in particular in terms of the wider landscape character/views and the nearby natural and heritage assets and their settings (specifically Wetheral Woods, which has public access, and the Old Priory). For example, there is no indication that the landscape impact of developments have been assessed against the Cumbria Landscape Character Guidance and Toolkit or the conclusions that have been reached. The Trust remains of the view previously expressed that: "a) development should be concentrated on the northern and western parts of the site, b) careful consideration would need to be given to building design and materials, and c) appropriate landscaping treatments, especially to the south and east of any new development would be necessary." The Trust also remains of the view that a detailed Development Brief is required for this site to ensure that where new development can appropriately be accommodated in principle that the specific site and surrounding area characteristics are appropriately respected in the detailed development.

- Generally, but specifically for Wetheral, assess the level of housing need in the settlement and in that context review the amount of development that can satisfactorily be accommodated, including in the context of existing constraints.
- Specifically review the environmental characteristics of site WETH1 and the amount of development to be accommodated. It is the Trust's view that in environmental terms only the north western part of this site, originally referred to as WE01 in the 2010 consultation, should be assessed as being suitable for consideration for allocation.

Response

An additional site has been proposed in Wetheral to the west of the B6263, in response to the preferred options consultation (first stage). At the time this allocation was made, there were no alternative sites proposed for Wetheral, and it was considered that taking into account the size of the village, and the existing level of services, 98 houses was an appropriate level of housing for Wetheral to accommodate over the Plan period. There are approximately 680 houses in the village, and whilst the local services include a doctors' surgery and railway station with trains to Carlisle and Newcastle, the village lacks a primary school. The proposed site is bordered on two sides by housing, and whilst the landscape is flat and open, there is potential to integrate any new development with the existing built form of the village, and through good design establish an attractive edge to the village. In conclusion, it is not considered that the village should accommodate both sites as a whole, but that a proportion of each site should be allocated, with an indicative target of 50 houses on each site.

Proposed Change

Weth 1 - indicative yield amended to 50 houses. New allocation west of B6263 for 50 houses.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0250	Comment	Policy	272	WETH1
043	Nigel Winter	Stagecoach		
Detail	Developing the site will support sustainable passenger transport.			
Response	Comments noted. The site area and capacity has been reduced by approximately half, and an additional preferred options site allocated on the opposite side of the road. The total number of houses remains the same. The Highways Authority has indicated that a Transport Assessment and Travel Plan will be required.			
Proposed Change	No change to policy in response to this comment.			
0251	Comment	Policy	273	WREA1
043	Nigel Winter	Stagecoach		
Detail	Does not support sustainable passenger transport and cannot be easily served efficiently or sustainably.			
Response	Comments noted. However, Wreay is considered a sustainable location for a small amount of development as it has a village primary school with capacity for more pupils, a pub, a village hall and a church. Some additional housing would have the potential to help sustain these facilities.			
Proposed Change	No change to policy in response to this comment.			
1092	Comment	Policy	274	Harker
194	Michael Barry	Cumbria County Council		
Detail	Is also identified as a primary employment area. It is not well related to local facilities and development as housing would require cycle path along C1015/1022 Site has poor accessibility and would potentially require a developer contribution to improve bus service frequency. Any development would require a Transport Assessment and Travel Plan.			
	Approximately 5-10% of the site is predicted by 1:100 year Surface Water Mapping to be at risk of surface water flooding.			
	No minerals or waste constraints or planning issues			
	The scale of development appears disproportionate to the scale of the settlement in a rural location.			
Response	The site has been identified as a preferred option for housing development with an indicative yield of 300 houses. There will be continued dialogue with CuCC over site selection and delivery process.			
Proposed Change	Site allocated as preferred option for housing with indicative yield of 300 houses.			

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

0252	Comment	Policy	274	Harker
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043	Nigel Winter	Stagecoach		
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Detail Does not support sustainable passenger transport and cannot be easily served efficiently or sustainably.

Response This is an alternative option and has not been selected as a preferred option housing allocation.

Proposed Change No change to policy in response to this comment.

1094	Comment	Policy	274	Houghton
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194	Michael Barry	Cumbria County Council		
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Detail HO02: Would require access of Houghton Road.
A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.

1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding

No minerals or waste constraints or planning issues

Response This is an alternative option for housing and has not been identified in the Local Plan as a preferred option. The Plan makes provision for sufficient housing to meet housing need as identified in the HNDS, and as such there no need to allocate any further sites.

Proposed Change No change to Plan in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1129	Comment	Policy	274	Houghton
195	Andrea McCallum	Clerk to Stanwix Rural Parish Council		
Detail	<p>The Parish Council agrees that no further allocations should be proposed for sites in Houghton. A recent community meeting agreed unanimously that any significant development of the village would severely prejudice Houghton's rurality, community identity and sense of place, and would be strongly opposed. However: small scale infill development to provide affordable homes only, for people local to the village, would be acceptable if appropriate.</p> <p>Site Hoo1 A greenfield site development of which would result a significant enlargement of the overall footprint of Houghton and impact adversely upon the rural character of the village. Additionally, it would impose significantly greater demands upon the village's infrastructure and services; and would be a significant intrusion into open countryside. It would also suffer due to issues arising from inadequate and problematic local drainage and the presence of the Brunstock Beck flood plain.</p> <p>Site Hoo2 This site too, if developed, would be a considerable intrusion into open countryside and constitute a significant enlargement of the village, imposing severe additional demands upon its infrastructure and services. Any development would be subject to significant noise pollution from the M6 and thus would require large scale mitigation works.</p> <p>Site Hoo3 The brownfield former Hadrian's Army Camp presently constitutes a County Wildlife Site where many species of wild birds along with bats, hedgehogs, foxes, red squirrels, badgers and deer are often seen; the site also hosts rare plant species. However; planning consent was recently given for 100 houses to be built across almost 5 hectares of this County Wildlife Site, severely damaging its usefulness as a contributor to biodiversity. The site lies directly opposite Cumbria Wildlife Trust's newly created Gosling Sike Farm wetland habitat.</p>			
Response	<p>No further allocations are proposed for Houghton.</p> <p>Policy 20 makes provision for housing development on sites that are not specifically allocated in the Local Plan, subject to a number of criteria covering scale, layout, design, landscape, location, amenity, access and car parking issues. However, this policy does not stipulate that such housing is to be affordable homes only for local people, as this would not comply with policy in the NPPF.</p>			
Proposed Change	<p>No change to Plan in response to this comment.</p>			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1095	Comment	Policy	274	Houghton
194	Michael Barry	Cumbria County Council		
Detail	<p>HO03: Would need second point of access and corridor improvements. The site would require provision of new bus stops and potentially require a bus service extension into the site. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward. Surface water drainage /flood risk issues will need careful consideration and Lead Local Flood Authority input.</p> <p>1:100 year Surface Water Mapping predicts minimal areas (<5%) affected by surface water flooding</p> <p>Includes part of the Hadrian's Wall World Heritage Site, which is legally protected as a Scheduled Monument. Clearly there would be a great deal of concern raised over any development of the WHS - recommend that the area of the WHS is taken out of the area for allocation. May be some issues concerning the visual impact of the WHS and so advice that English Heritage are consulted in the event that this area is considered for inclusion in the local plan.</p> <p>No minerals or waste constraints or planning issues</p> <p>The scale of development appears disproportionate to the scale of the settlement in a rural location.</p>			
Response	This is an alternative option for housing and has not been identified in the Local Plan as a preferred option. The Plan makes provision for sufficient housing to meet housing need as identified in the HNDS, and as such there no need to allocate any further sites.			
Proposed Change	No change to Plan in response to this comment.			
1093	Comment	Policy	274	Houghton
194	Michael Barry	Cumbria County Council		
Detail	<p>HO01: It is assumed access would be via Church Lane. Public Right of Way FP 132013 crosses the middle of the site and would need to be taken into account. Surface water drainage/flood risk issues will need careful consideration and Lead Local Flood Authority input. A Transport Assessment and Travel Plan will be required to support subsequent development proposals should the site be taken forward.</p> <p>Approximately 5-10% of the site is predicted by either Surface Water Mapping to be at risk of surface water flooding or in Flood Zone 2 or 3.</p> <p>No minerals or waste constraints or planning issues</p>			
Response	This is an alternative option and has not been allocated as a preferred option for housing.			
Proposed Change	No change to Plan in response to this comment.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0253	Comment	Policy	274	Houghton
043	Nigel Winter	Stagecoach		
Detail	(HO 01, 02, 03) HO 03 will require a bus spine road in order to serve the site efficiently and sustainably.			
Response	This is an alternative option and has not been selected as a preferred option housing allocation.			
Proposed Change	No change to policy in response to this comment.			
0478	Objection	Policy	274	Houghton
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	Friends of the Lake District objects to the allocation of the Houghton Camp for housing. The site is a County Wildlife Site which means it is of high value for biodiversity. A considerable part of the site has already been lost to housing development in the past without adequate compensation for the loss of habitat and species. Request: Do not put this site forward for allocation for housing.			
Response	Houghton Camp has not been allocated for housing. It is an alternative option.			
Proposed Change	No change to Plan in response to this objection.			
0095	Objection	Policy	275	Smithfield
044	John Cornthwaite			
Detail	I support the Council's policy as shown in the SHLAA of Sep 12, but as I now understand the proposals, the site has been relegated to an alternative option rather than a preferred option. The site is adjacent to the village school, which caters for a much wider area and is the only site in Smithfield recommended as developable in the 2012 plan - in fact I believe it is the only site between Longtown & Brampton. I am of course aware that some years ago the council proposed the development of 3 sites in Smithfield of which the field SMO1 was one but only Ryehill Park was proceeded with. The field has main water and drainage on site and mains electricity is available on the boundary road. Consequently I feel limited development on the site to be suitable and this is what was proposed in the SHLAA of September 2012. I therefore suggest that the site should be a preferred option with a specific housing allocation.			
Response	The site extends to 2.5 hectares, and if it was developed in its entirety could almost double the size of Smithfield. Some limited development would be acceptable in principle on this site under Policy 20. This policy makes provision for housing development on sites that are not specifically allocated for housing in the Local Plan, subject to criteria relating to scale, layout, design etc.			
Proposed Change	No change to Plan in response to this objection.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
1096	Comment	Policy	275	Smithfield
194	Michael Barry	Cumbria County Council		
Detail	No major issues but highway corridor improvements across site frontage would be necessary. FP 123012 runs north to south across the western side of the site and would need to be taken into account.			
	1:100 year Surface water mapping predicts there a no areas affected by surface water flooding			
	No minerals or waste constraints or planning issues			
	The scale of development appears disproportionate to the scale of the settlement in a rural location.			
Response	This is an alternative option for housing and has not been identified in the Local Plan as a preferred option. The Plan makes provision for sufficient housing to meet housing need as identified in the HNDS, and as such there no need to allocate any further sites.			
Proposed Change	No change to Plan in response to this comment.			
0254	Comment	Policy	275	Smithfield
043	Nigel Winter	Stagecoach		
Detail	Does not support sustainable passenger transport. Difficult to serve effectively and sustainably.			
Response	This is an alternative option and has not been selected as a preferred option housing allocation.			
Proposed Change	No change to policy in response to this comment.			
0049	Support	Policy 19		CARL8
026	Client of Taylor & Hardy	Ref: MEH/J/C12/129		A004
Detail	Clients are pleased that this allocation has been made and confirm that they are to bring the site forward for residential development in the near future.			
Response	This response to be included in summary of responses to show deliverability of site.			
Proposed Change				

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0047	Support	Policy 19		CUMW1
025	Client of Taylor & Hardy	Ref: MEH/J/C13/052		A004
Detail	Clients are pleased that the allocation has been made and confirm that they are to bring the site forward for residential development in the near future.			
Response	This response to be included in summary of responses to show deliverability of site.			
Proposed Change				
0050	Support	Policy 19		WETH1
027	Client of Taylor & Hardy	Ref: MEH/J/C12/035		A004
Detail	Clients are pleased that this allocation has been made and confirm that they are to bring the site forward for residential development in the near future.			
Response	This response to be included in summary of responses to show deliverability of site.			
Proposed Change				
0053	Objection	Policy 19	270	Scotby Alternative
030	Client of Taylor & Hardy	Ref: MEH/J/C11/039		A004
Detail	Client's objects to the site not being allocated for residential development and their preference would be for the site to be allocated for residential development as this would reflect its clear unconstrained potential for this use. Client's have fully appraised the feasibility of developing the land for residential development and they own all of the land presently indentified as being the Alternative Option, including the means of access. The appraisal (attached) which supports the site's clear potential, has been set out in papers sent to the Local Planning and Highways Authorities 7 April 2011, 29 June 2012, 18 February 2013.			
Response	Two separate planning permissions have amounted to provision for 73 houses in Scotby on unallocated sites, (at Broomfallen Road, and Scotby Steading). This site protrudes into open countryside, and does not integrate with the existing built form of the village. Whilst the highways issues that have been raised can be addressed, the impact on residents of Holme Fauld and Holme Close of an additional 40 houses would be significant.			
Proposed Change	None. No new allocation as a result of this site proposal.			

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

REPRESENTATIONS

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

Chapter SA

0543	Objection	Policy		
114		Mr Albert Rushton		
Detail	No plan to develop/redevelop existing housing stock/space above shops etc.			
Response	This is not something that the Sustainability Appraisal directly effects but it may be something that the Empty Property Strategy seeks to address. Additionally the Local Plan contains policies that would allow redevelopment of spaces above shops, in some cases this is Permitted Development (does not require Planning Permission).			
Proposed Change	No proposed change.			

0168	Objection	Policy		
063		Ms Rose Freeman	The Theatre Trust	
Detail	The Sustainability Appraisal makes no mention of protection and enhancing the District's existing arts and cultural facilities. Paragraph 5.2 states that arts and cultural facilities will be developed, but this isn't mentioned in the Objectives – only that cultural heritage sites will be protected. The Appraisal comments for Policy 12 make no mention of protecting existing arts and cultural facilities for sustainability.			
Response	Paragraph 5.2 of the Sustainability Appraisal highlights Carlisle City Council's corporate priorities of which developing vibrant sports, arts and cultural facilities is one. This is not to suggest that arts and cultural facilities will not be protected. The Local Plan Policy 11 - Arts, Culture, Tourism and Leisure Development has been amended to say "Proposals will be supported where they contribute towards the development and/or protection of arts, cultural, tourism and leisure offer of the District and support the economy of the area". Whilst the sustainability appraisal objectives do not mention arts and cultural facilities directly, they do assess the effects of a Policy/Site Allocation on people's sense of wellbeing. It is considered that access to arts and cultural facilities would improve people's sense of wellbeing. This Policy will be reassessed now that policies 11 and 12 have been merged.			
Proposed Change	The Policy has been amended to include reference to the protection of arts, cultural and leisure development. This Policy will be assessed as part of the SA for consultation on the Local Plan Preferred Options - Stage Two.			

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

0927 Support Policy

005 Paul Barton Clerk to Dalston Parish Council

Detail Yes

Response Comment of support noted.

Proposed Change No proposed change.

0651 Objection Policy

138/10 Mrs Jill Ridley

Detail I think the development [WAR1] would be much better on the other side of the A69 where all the facilities are located.

Response Noted. A number of alternative sites have come forward within Warwick Bridge and are currently being considered.

Proposed Change There is no proposed change in response to this comment.

0647 Objection Policy

137/9 Mr Andrew Liddle

Detail If sites at Carl10 and Carl9 and Carl1 are sites that are preferred options to take forward as residential sites. How is this consistent with the arguments that have been used for Ca55 and Ca22 which state that there are junction capacity issues with Jct44 and schooling provisions in this location.

Response There are wider reasons for the proposed allocation of sites Carl 1 and Carl 10 (Carl9 has been removed at the desire of the landowner), including that they are better related to the built up area of the City. Ca50 & Ca22 are not completely discounted as a future development sites however their allocation is not proposed over this Plan Period. As highlighted within the site description, as development of the adjacent Crindledyke site progresses, the detached nature of this site will diminish and it could prove a strong allocation in the next plan period.

In terms of J44 capacity issues and a lack of school places in north Carlisle it is correct that these same issues apply to Carl 1 and Carl10. As such this will be mentioned within the site descriptions for these sites.

Proposed Change Site descriptions for Carl1 and Carl10 will be amended to include reference to J44 capacity issues and a lack of school places in north Carlisle.

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

0642 Objection Policy
135/7 Mrs Charmi McCutcheon
Detail This should be a don't know, the language of the documents are too formal for me to comprehend
Response Comments are noted. The SA is a technical document to support the Local Plan however a non-technical summary will be prepared prior to publication.
Proposed Change No proposed change in response to this comment.

0636 Objection Policy
134/6 Mr Nigel Holmes
Detail Yes
Response Comment noted.
Proposed Change There is no proposed change in response to this comment.

0631 Support Policy
132/4 Mr John Slack
Detail Yes
Response Comment of support noted.
Proposed Change No proposed change.

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

0627 Support Policy
 131/3 Miss Judith Crawford
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

1099 Comment Policy
 195 Andrea McCallum Clerk to Stanwix Rural Parish Council
 Detail In order to provide an informed response to the question it is necessary to first consider the evidence referred to. The Sustainability Appraisal, Scoping Report and the Habitats Regulations Appraisal alone total 423 pages; however, before being able to agree or disagree with the appraisals it is necessary to ascertain the degree to which they conform to the relevant national policy e.g. The Sustainable Communities Regulations and The Habitats Regulations, themselves. Full consideration of all these documents would be a task impossible for most individuals and Parish Councils question 3 is therefore unlikely to elicit any meaningful robust local evidence.
 Response Comment noted.
 Proposed Change No proposed change in response to this comment.

0611 Comment Policy
 128 Cllr John Mallinson Carlisle City Conservative Group
 Detail The Plan should also take a more relaxed approach in regarding the sustainability Appraisal/Test for new housing in the rural areas. The Plan does not do enough to encourage housing development in the rural areas of the District. The Plan requires to take into account housing developments in the rural areas of the District, which are often not on a scale large enough to deliver and Affordable Housing option within the site. Consequently, rural areas do not benefit from such schemes. Housing Developments with a mixture of both market value and affordable homes create a more balanced social mix.
 Response It is important that housing is delivered in the rural area, be that market or affordable housing. The Affordable Housing Policy (19) requires affordable housing to be delivered/a contribution towards this across 2 zones, each requiring affordable housing whilst ensuring that this will not make a scheme unviable. Large scale housing development within a village may saturate it and not result in an appropriate social mix. It is important that the Local Plan encourages development in appropriate development across the District.
 Proposed Change No proposed change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0668	Objection	Policy		
143/15	Mr Ian Fyfe			
Detail	If the NPPF is concerned with improving living space, land use and traffic flow, then this plan is not consistent with those aims.			
Response	Comment is noted. The Sustainability Appraisal assesses the Plan by seeking to encourage the sustainable use of land whilst improving the availability and use of sustainable transport modes and encouraging the use of sustainable design and construction techniques.			
Proposed Change	There is no proposed change in response to this comment.			
0480	Comment	Policy		
103		Kingmoor Park Properties		A017
Detail	The Draft Sustainability Appraisal (Summer 2013) highlights significant benefits of concentrating employment uses at Kingmoor Park, but also identifies the sustainable benefits that would result from the identification of an employment site to the south of the city.			
Response	It is considered that whilst Kingmoor Park is of significant importance in terms of strategic employment within the City, the Local Plan has to recognise that there is a significant unbalance between access to employment between the north and south of the City. It is therefore considered that a sustainable option in terms of growth over the Plan period will be to allocate land to Carlisle South for employment opportunities.			
Proposed Change	No proposed change in response to this comment.			
0449	Objection	Policy		
102	Dr Kate Willshaw	Friends of the Lake District		
Detail	There are a few places where I disagree with the sustainability assessment made of a policy. For example Policy 64 (Biodiversity and Geodiversity) is likely to have a positive effect on Objective 19 despite this objective being evaluated as neutral. Objective 19 states "Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change". Policy 64 can do this by enabling creation of carbon sinks e.g. by planting trees, restoring bogs and wetland, and can also enable adaptation to climate change by creation of natural flood storage such as wetlands and woodlands.			
Response	Comments are noted and the Policy has been reassessed.			
Proposed Change	The Sustainability Appraisal for this Policy (now Policy 62 - Biodiversity and Geodiversity)has been reassessed.			

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

0415 Support Policy

097 Amy Heys Environment Agency

Detail Yes

Response Comment of support noted.

Proposed Change No proposed change.

0394 Support Policy

092 Rachael Coar Persimmon Homes

Detail Yes

Response Comment of support noted.

Proposed Change No proposed change.

0387 Comment Policy

090 Elizabeth Allnutt

Detail Policy S1 should be reassessed [see comments Rep No 0386 S1]
also Readdress the Economic Policies [see comments Rep No 0387 chapter 4 para 4.1]

Response Policy S1 is the standard Policy prescribed by the Planning Inspectorate for considering sustainability within the Local Plan, as such it is considered that this is a sustainable Policy by virtue that is prescribing the sustainable development of the Plan. In terms of economic policies, as with all other Policies contained within the draft Plan, this has been assessed against the sustainability appraisal objectives which cover the three strands of sustainability; environmental, social and economic. Where a Policy or site is considered to have a negative impact against the sustainability appraisal objective, this has been highlighted. It is therefore considered that equal weight is given to each of the strands of sustainability and it is not biased towards the positives of economic development to the detriment of social and environmental considerations.

Proposed Change No proposed change.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation		Agent
0277	Comment	Policy		
077	Mr Alan Hubbard	National Trust		
Detail	No particular observations to make.			
Response	Comment noted.			
Proposed Change	There is no proposed change in response to this comment.			
0269	Comment	Policy		
074	Tim Coombe	Sustainable Brampton		
Detail	<p>It was encouraging to note the emphasis given throughout the Carlisle Local Plan to achieving steady economic growth with policies that are also socially and environmentally sustainable. However, if the preferred options prove unaffordable, the alternative plans fall well short of meeting government targets, as highlighted in red (as a negative impact) in the accompanying Sustainability Appraisal (SA) tables. Even the Preferred Option contains issues causing a negative impact (scored red) in some key areas of planned development which is clearly undesirable and the Plan should seek to mitigate these by all reasonable means. The preferred options that score highly in the SA would generally be supported by members of Sustainable Brampton.</p> <p>The 20 objectives listed in the Sustainable Appraisal have mostly been championed by Sustainable Brampton since its formation in 2006. We were pleased to note that the Sustainability Appraisal (SA) highlights the consequences of ignoring sustainability issues in the Plan but the challenge will be to defend them robustly when inevitable issues of affordability arise.</p> <p>The SA should in principle ensure that the Executive gives due weight to sustainability issues at all stages in planning. It would therefore have had more authority had it been drafted independently from the planning office. Nevertheless, SB would wish use the arguments in it to hold the Executive to account if necessary. If economic development is to be properly sustainable then it cannot be as indiscriminate as the CLP implies it could be. There needs to be a proper debate about where rural development is heading and what sustainability means in this context which should involve community organisations such as the Brampton Economic Partnership, The Brampton and Beyond Community Trust and Sustainable Brampton.</p>			
Response	<p>Comments are noted. On the whole, where the SA has highlighted a policy/site as red (negative) against a sustainability appraisal objective this does not necessarily mean that a site/policy is unsustainable in the whole. Therefore, it is not considered appropriate to remove/amend a site or Policy from the plan where it doesn't receive all positive outcomes. There can be other overriding reasons that could justify the inclusion of said policy or site.</p> <p>Additionally, the SA is an important technical document to accompany the Plan and it is therefore important that the Plan is developed closely with the SA. As such it has been important that the SA has been completed in house. The SA has been consulted on with statutory consultees like Natural England, English Heritage, Environment Agency and the general public. Any comments received have been taken into account when progressing with the Plan therefore whilst it has not been completed independently, it has been assessed by consultees.</p>			
Proposed Change	There is no proposed change in response to this comment.			

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

0257 Support Policy

073 Mrs Sarah Kyle Clerk to Hethergill Parish Council

Detail

Response Support noted.

Proposed Change No proposed change.

0621 Objection Policy

130/1 Mr Alan Gadman

Detail

My first comment is ..have you presented any of these documents to the Plain English Society for its Crystal Mark? I consider myself to be educated but I struggled with some of the language, format and jargon. Can it be simplified for the purposes of wider consultation? Also which environmental organisations have assisted in the plan's development. Have CPRE, Natural England etc. been consulted in advance of publication? My experience has been that there is a lack of follow up and maintenance when plans have been agreed. This means that cycle and foot paths are not maintained, when animals have been considered such as bats the authorities have delayed plans for assessment but cannot identify the impact of a development's footprint on the environment until after building has taken place. In addition the lack of oversight for some developments has meant that structures have been built against clear guidelines only to be then given retrospective permission. So a plan is only as good as its enforcement and I do not see any real rigour or commitment to the SA when faced with the political demands of government and building interests. This type of plan if it is followed is costly. Who is expected to cover the costs of maintaining hedgerows etc? What needs to be included in regard to National Plans for the nuclear industry and energy policy? Should the future issues of a Nuclear Waste Depository and Shale Gas exploration in the area and region be referred to in such a document as a special area of concern? I recognise that locally elected representatives will play a part in the governance of such plans but what opportunity is there for an area like Carlisle to involve panels of local independent people to be involved in oversight or management of the plan? Despite its formulaic approach I do not have confidence that any SA plan will be implemented and enforced when faced with pressure from developers and political interests locally.

Response The SA is a technical document that supports the Local Plan however prior to publication of the Local Plan a non-technical document will be produced. The Sustainability Appraisal was consulted on for the same length of time as the Local Plan itself and was sent to all statutory consultees as well as provided to the general public to comment, this includes Natural England, English Heritage and the Environment Agency. Any comments that have been received will be taken into account and the SA will be updated prior to the second Preferred Options Consultation. It should be noted that comments relating to the future of the Nuclear Waste Depository and Shale Gas exploration is the responsibility of Cumbria County Council as the Minerals and Waste Local Authority and as such is beyond the remit of this Plan.

Proposed Change There is no proposed change in response to this comment.

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

0757	Support	Policy		
156/29-31	Mr Viv Dodd	Cumbria Business for Business		
Detail	Yes			
Response	Comment of support noted.			
Proposed Change	No proposed change.			

0923	Support	Policy		
192	Mrs Allison Riddell	Clerk to Irthington Parish Council		
Detail	No further comment			
Response	Comment noted.			
Proposed Change	No proposed change.			

0916	Objection	Policy		
190	Mrs Patricia McDonald	Clerk & RFO to Orton Parish Council		
Detail	The SA if applied to any rural village, would prevent any houses being built in the rural villages at all.			
Response	It is not the role of the SA to block development in the rural area. The SA is used to ensure that the most sustainable options are taken forward when considering social, economic and environmental characteristics. The SA has helped to direct preferred housing allocations within the rural area to those settlements that have the most services and are the best served by public transport. Therefore the SA would not block sustainable development within the rural area.			
Proposed Change	There is no proposed change in response to this comment.			

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

o861 Support Policy
 174/48/49 Mrs Olwyn Luckley
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

o848 Support Policy
 171/46 Mr Jonathan Fowler Clerk to Walton Parish Council
 Detail Very detailed. Note: Table 3 Page 15 gives clear objectives.
 Response Comment noted.
 Proposed Change No proposed change.

o839 Support Policy
 169/44 Messrs Watson A022
 Detail Sustainability is of course one part of the plan process but there are other factors which have a strong bearing on the attractiveness of a southern gateway development taking place on land adjacent to J42 of M6 even if the site is currently greenfield.
 Response Comment noted. Just because a site is currently greenfield does not automatically make its future development 'unsustainable' in Sustainability Appraisal terms.
 Proposed Change No proposed change.

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

0829 Support Policy
 164/39 Mrs Jane Hodgson
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

0824 Comment Policy
 163/38 Mr William Gordon Percival
 Detail Unable to make a comment
 Response Comment noted.
 Proposed Change No proposed change in response to this comment.

0812 Support Policy
 160/35 Mrs Catherine Leach Clerk to Bewcastle Parish Council
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

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

0067 Support Policy
034 Lucy Adamski Aoo8
Detail Yes
Response Comment noted.
Proposed Change No proposed change in response to this comment.

0790 Objection Policy
157/32 MR DONALD WATT
Detail No
Response Comment noted.
Proposed Change There is no proposed change in response to this comment.

0661 Objection Policy
141/13 Mrs Claire Reid
Detail environment-more traffic, fumes, carbon footprint etc field areas where animals and wildlife live will be destroyed further than it already has been the housing area will grow too large and lose its community feel
Response Comment is noted. Sites that are proposed for allocation are those which are considered to be sustainable locations for growth across the District. It is important that new land is identified for housing to accommodate the forecasted natural population growth. Whilst the Plan has identified some brownfield sites for development, it is acknowledged that the majority of sites are greenfield. Whilst there will be impacts of development such as increased traffic etc, by directing development to those areas that are best served by existing services, including public transport, this will help to minimise their impact. It is important that development is proportionate to the size of each settlement and as such proposed site allocations are considered to be proportionate and not over dominate.
Proposed Change There is no proposed change in response to this comment.

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

0752 Objection Policy

155/28 Mrs K Woods

Detail It does not sufficiently inhibit the proliferation of wind turbines which are dominating the area, negatively impacting residents, property values and the amenity of the area.

Response It is important to note that the Council cannot adopt a negative policy towards large scale wind as this would be against national policy and likely to fail the Government's 'test of soundness'. Additionally this stance would not help to promote national priorities or strategic objectives and would be contrary to the findings of the evidence base.

Proposed Change There is no proposed change in response to this comment.

0732 Support Policy

154/26/27 Mr Bryan Craig

Detail Yes

Response Comment of support noted.

Proposed Change No proposed change.

0726 Support Policy

152/24 Mr Craig Brough

Detail

Response Support noted.

Proposed Change No proposed change.

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

0709 Support Policy
 151/23 Mr Bob Sharples Sport England
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

0695 Support Policy
 150/22 Mr Ian Yates
 Detail yes
 Response Comment of support noted.
 Proposed Change No proposed change.

0690 Support Policy
 149/21 Mr Kevin Bell A021
 Detail
 Response Support noted.
 Proposed Change No proposed change.

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

0683 Support Policy
 147/19 Mr Viv Dodd
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

0676 Support Policy
 146/18 Mr Ian Brodie The Ramblers
 Detail Yes
 Response Comment of support noted.
 Proposed Change No proposed change.

0795 Objection Policy
 158/33 Mrs Julie Templeton
 Detail Once again the lack of the City Centre Masterplan makes it difficult to agree with the Sustainability Appraisal.
 Response Comment noted. The City Centre Masterplan has now undergone its own consultation and as such Policies will be included within the second stage of preferred options consultation. The Sustainability Appraisal will be used to assess any new Policies that are formulated for the City Centre. There will be the opportunity to comment on this in March.
 Proposed Change There is no proposed change in response to this comment.

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0665	Comment	Policy	BRAM1	
142/14	Mr Stephen Young			
Detail	<p>SA1 - No evidence given for actual employment opportunities. SA4 - Covering open green sites with buildings is bound to affect water drainage - maybe a full hydrological survey would be in order. SA7, 11 & 12 - No evidence about peoples intentions or bus companies willingness to provide the service. SA8 & 9 - Council needs to be proactive to ensure builders do what is necessary. SA11 & 12 - Pie in the sky! Where is the evidence that proximity to the town edge encourages walking? SA13 - The population needs more starter homes (terraces?) and appropriately fitted bungalows for the elderly. SA14 - The comment is plain nonsense. Also if this holds then it has a negative effect on the bulk of the local population because the health centre is moving from the town centre. SA15 - Planners need to be proactive to ensure builders provide more biodiversity in soil management and planting schemes. SA16 - Planner need to ensure that more open space is provided. Also housing design needs to be more thoughtful - less houses as modern pastiches. How about some more cutting edge designs rather than off-the-shelf standardised houses. SA18 - Your comment contradicts the statement in SA7 Your comment - Overlooks the position of this site in relation to 2 major approach roads and therefore needs some sensitive planning. The southern boundary of this site projects beyond the current build line and is therefore detrimental to the town. Please note that the on-line questionnaire only allows comments on a limited number of sites. I wish to comment on the other Brampton sites. Most of my comments do however hold for the other sites</p>			
Response	<p>SA1 - In terms of the SA, whilst it does not itself identify jobs, it does identify that there are employment opportunities close by within Brampton. SA4 – in relation to water drainage, the Council seeks advice from the Environment Agency and United Utilities. It is not considered that there are any issues that would cause a detrimental effect on drainage that could not be designed out at planning application stge. SA7, 11 and 12 discussions with Stagecoach have suggested that where there is new demand, bus routes can be altered, it is believed that this would be the case if this site were to be developed. Whilst it is impossible to evidence people’s intentions in terms of walking and cycling, the location of this site would provide opportunities for people to walk/cycle to the centre of Brampton to access services. SA14- Whilst it is recognised that the move of the medical centre would have an effect on the majority of the residents of Brampton, it cannot be said that it would reduce safety and well-being and have a completely negative effect as new development would result in the creation of a modern medical facility with up to date facilities therefore providing the practice with the opportunity to expand the services they can offer and ensuring that the facility is capable of accommodating the future needs of the local population e.g. providing disabled access. SA15 – at detailed planning application stage more information would be available on planting, at this stage that level of detail is not yet available. SA16 – the level of open space provided is determined on a site by site basis, looking at provision available in the locality. The level of open space would be determined at detailed planning application stage. In terms of design, the Draft Local Plan contains a Policy on Design which encourages new development to follow design principles including; reinforcing local architectural features to promote and respect local character and distinctiveness. This should help to ensure that the design of a development is appropriate. SA18 recognises that where there is any new housing development there will be an increase in cars, regardless of where the site is located. Whilst SA7 states that there may be an increase in the range of bus routes, it is acknowledged that not everyone will choose this more sustainable option. It is therefore considered that any development has the potential to have a negative effect on local air quality however this may not necessarily be a detrimental effect.</p>			
Proposed Change	No proposed change.			

RepNo	Status	Paragraph	Page	Map
Consultee Ref No	Consultees.Contact	Organisation	Agent	
0656	Objection	Policy	WARW1	
139/11	Mrs Yvonne Petry			
Detail	Definitely not suitable for this side of the A69 children and old age people crossing road and walking. Once start building on this land where will it stop !!! The River Irving at Newby Bridge !!			
Response	Noted. A number of alternative sites have come forward within Warwick Bridge however WARW1 is still considered to be the most appropriate for future development within Warwick Bridge.			
Proposed Change	There is no proposed change in response to this comment.			

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