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The Director
Investment and Policy,
Carlisle City Council,
Civic Centre,
Carlisle, CA3 8QG

9th April '15

Dear Sir,

Carlisle District Local Plan 2015 -30

Thank you for the opportunity to comment on the above 15 Year plan, clearly officers have committed considerable work and skill into developing this plan and should be commended for doing so.

My response referrers to the general sections and page numbers from the PDF document, I trust that you will be able to reconcile these.

Housing Strategy & Delivery

P96 prior to "Resisted" insert "Vigorously", thus emphasising the Council desire to avoid no designated areas being developed.

Why have Brownfield sites or Conversion Areas / Buildings not been scheduled in this section, although the Viaduct Estate / Former Central Plaza Hotel is scheduled for light Industrial se a great deal of it is has laid to waste for too long and should also be offered as a Brown Field residential area

P102 Windfall Development - It must be made clear that this will only be accepted provided the identified areas have been developed first.

P105 Backland Development should only be considered when all other land has been identified in this plan has been used. The provision of Backland Development can open the door to speculators purchasing sound properties purely to enable them to build. Where is the provision for local people to be informed of proposed backland provision and what are their rights of objection. The Plan needs to address this aspect.

P105 Why are we watering down the provision of Affordable Housing by inviting the developer to make a financial provision to opt out of this commitment. This is a very easy

option for a developer, one that could increase the cost of the eventually built properties,. Delete that opportunity.

P111 Define “Excessive Development Cost” and how you will assess these. This option again weakens the development of affordable housing.

General Note

This section needs to be reinforced with a comment that housing will not be permitted to be built on the Flood Plain on the periphery of our parks and recreational land.

Climate Change & Flood Risk

P152 Both the size of the turbine and its distance require to be revisited.

The size of 25 m is consider to be too large, and the 800m distance from residential property too small as it leaves open the opportunity for smaller sized and higher density turbines to be sited. The document needs to address these smaller turbines as they could be on farm or industrial sites. The document needs to be far more robust and specifically say where they will NOT be allowed within the administrative Boundary. Phrases such as

“do not have a significant adverse impact on the location, in relation to visual impact caused by the scale of development, on the character and sensitivity of the immediate and wider landscape, townscape or historic environment and their settings.”

AND

“ Do not have an unacceptable impact on local amenity and can successfully mitigate against any noise”

are very subjective could be debated over, as I am sure that they will be by prospective developers of these Turbines.

The paper fails to comment on the maximum density of Turbines per Square Mile that will be allowed and distinct areas where they will not be allowed for example along the banks of the River Eden. The Plan should define “Significant”.

References to the document as it is written in this section provide an open door policy to the “Turbine Lobby” and will leave the area littered with them of all sizes and locations. A poor & weak section. The proposals as they stand offer loopholes that the Turbine industry will exploit.

Infrastructure

P131 and following sections. I am fully supportive of Para 6.6.

In general terms this section notes the current position. It sets out generic sound intentions but fails to be firm and positive in its intentions. This really needs to be strengthened with how the current weaknesses are to be addressed.

P139 IP5 The current system of Multi use containers, bags etc is not acceptable, while the philosophy of central points for new builds is to be welcomed, as are the considerations for their use by residents, it is important that this plan addresses the totally unsatisfactory use of the current system, the refuse that is left on the street following collections, the inflexibility of additional waste , and the management of the current contracts.

IP7 Airport

This section assumes that the airport and its warehousing will be successful, there is no fallback position in this document in the event of failure which may result in the Council having to manage the position.

HE1 P Hadrian's Wall

The statement of good intent is to be welcomed, including the proposals to restrict development both within and adjacent to the World Heritage Site. There is in my opinion a real failure in the plan to consider the long term maintenance of the Site. There is nothing to support those SME's who are providing facilities to Walkers and visitors to the Wall and above all there is no mention of Sanitary facilities which are urgently required along the Wall, particularly where there are long stretches between rest places.

Likewise the Plan fails to mention the urgent need for public Transport on a daily basis without the need to prebook, along the wall and linking with the local communities. I accept that the Wall spans two counties however Carlisle needs to address these issues stating that it will work closely with those authorities.

Arts, Culture Etc

P87

There is a passing reference to theatres, disappointingly no drivers toward this. If this city wishes to develop not only as a thriving place for people to live, and for tourists to stay and visit, it really must do better and address this key issue It cannot survive for another 15 years on a converted fire station and tin roofed sports centre.

On balance while the plan forms a sensible base line for the next 15 years, it in my opinion states sound principles and statements of good intent that I would expect , for example

- road and street layouts are designed to be safe and secure and minimise the conflicts between traffic and pedestrians and cyclists;
- Landscaping schemes are an essential consideration of the design process. Landscaping schemes can take two forms: soft landscaping which includes tree and shrub planting; and hard landscaping concerning paving, walls etc

Where the fails is that it does not address any areas for Redevelopment, it is known that some of the Housing stock particularly in the inner areas of the city is coming to the end of

its useful life and the surrounding road networks are inadequate for traffic that uses those roads. Therefore the Plan should consider those areas and how it will work towards renewing the housing stock, which may well reduce the need to build on Greenfield Sites.

I am disappointed that the plan with its lack of redevelopment fails to comment on the use of redundant buildings and the need to take dynamic and expeditious steps to either bring them back into use as originally designed, converted, or demolished to provide open spaces. The administrative area has a significant number of redundant and decaying buildings, including the former Tarn End Hotel, Central Plaza Hotel, White Quey, and Public Houses and other land.

A further omission is that the Plan fails to address the lack of Cross County and Cross City travel both by Car, Bus, or train. There is no mention of Park & Ride, Car Clubs or provision. There is no driver to improve the Rail Network to the North East which the Plan should address and ensure that the Council will drive forward. Neither am I able to identify any section that indicates that the Council will work positively to improve the infrastructure around Carlisle Station, by improving its access, parking and integrated transport hub. This is a crucial area that has been festering since 2008.

In my view the Plan is general statement of good intent but no driver or dynamism to move the city forward during the next 15 years.

Thank you for the opportunity to comment on this document.

Yours faithfully

D. Nash