

Your Ref:

Our Ref: RB/187J

21 April 2016

Investment and Policy
Carlisle City Council
Civic Centre
Carlisle
CA3 8QG

By email only: lpc@carlisle.gov.uk

Dear Sir / Madam

PROPOSED MAIN MODIFICATIONS: REPRESENTATIONS ON BEHALF OF KINGMOOR PARK PROPERTIES LIMITED

On behalf of Kingmoor Park Properties Limited (KPPL) I am pleased to submit representations in relation to the Proposed Main Modifications (March 2016) consultation. These representations should be read in conjunction with previous submissions made to the Local Plan 2015-2030.

Background

KPPL is the owner of Harker Estate, Low Harker which is a proposed housing allocation under Policy R11. The site is currently subject of an outline planning application for up to 300 houses which is due to be determined shortly. KPPL has strongly supported the Council's decision to allocate the site for this purpose and continues to do so.

The comments below relate to the modifications proposed, which are set out below (changes are underlined):

R 11: Kingmoor Park Harker Estate, Low Harker – an underused brownfield site with outdated buildings which are something of an eyesore, and which are unsuitable for ongoing commercial use. Its redevelopment for housing would yield a significant amount of affordable housing, and lead to an improvement to the local environment. The site lies close to junction 44 of the M6, and employment areas and other services in the north of Carlisle. There are a number of small businesses in Harker. There is a primary school at Blackford which is just over 2km away. Providing a safe route to school is likely to be an issue which will need to be addressed as part of any planning application.

Highways advice: would require cycle path along C1015/1022. Site has poor accessibility and would potentially require a developer contribution to improve bus service frequency. Improvements will be required to enhance pedestrian and cycle facilities linking the site to nearby schools etc.

Biodiversity: no statutory or non-statutory designations apply within or adjacent to the site. The main river which runs along the southern boundary of the site ultimately drains to the River Eden and Tributaries SSSI and SAC. However, housing development is not likely to have a significant effect on the interest features for which the SAC has been classified, subject to satisfactory measures to control run off during construction and on completion of the site.

Planning and Environmental Advisers

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Heritage assessment: no known heritage assets within or adjacent to site.

Environment Agency/Lead Local Flood Authority advice:

- likely surface water issues on site;
- main rivers border site – 8m buffer zones will be required;
- potential for surface water flooding on south west corner – would need to be careful with the layout to this part of the site – may provide the opportunity for open space here
- could cause surface water issues for any potential future land use to the south.

Other constraints: brownfield site - some contamination may be present and remediation likely.

Comments on Main Modifications Text

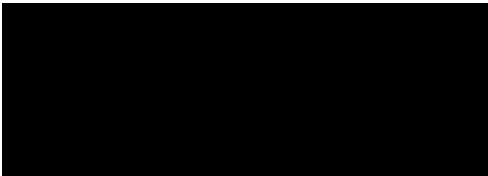
As highlighted above the site is currently subject of an application, which has been informed and supported by a full suite of technical documents. These documents demonstrate that development proposals are technically robust and that the site is clearly deliverable in the short term. This includes the matters identified above in the additional text, namely highways, biodiversity, heritage, flood/drainage and ground conditions.

KPPL objects to the description in the amended text which suggests the site has poor accessibility. As set out in the original text the site lies in close proximity to the M6 and therefore benefits from excellent easy access to the motorway network.

The Flood Risk Assessment also demonstrates that there are no problems with surface water or flooding and as such the new text should be amended to reflect these findings, in that reference to issues identified by the Environment Agency should be removed.

Notwithstanding these observations KPPL continues to strongly support the allocation of the site for residential development. The allocation is entirely appropriate and represents an excellent opportunity to deliver the regeneration of this now largely defunct brownfield site, especially given the absence of many other brownfield sites capable of redevelopment in Carlisle.

Yours sincerely



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