

Mr Garry Legg
Investment & Policy Manager
Carlisle City Council
Civic Centre
Rickergate
Carlisle
Cumbria
CA3 8QG

Our ref: NO/2007/100159/PO-01/SB1-L01
Your ref: 26 PUB 01
Date: 20 April 2015

Dear Mr Legg

Carlisle District Local Plan 2015 – 2030 – Proposed Submission Draft

Thank you for your letter of the 3 March 2015 consulting with us on the above plan, we have considered the document and would like to suggest the following changes:

Policy CC4 – Flood Risk and Development

Thank you for incorporating our suggested comments that we have worked closely with you on. We support the wording of this Policy.

Policy CC5 – Surface Water Management and Sustainable Drainage System

We support the wording of this Policy.

Policy IP 6 - Foul Water Drainage on Development Sites

We suggest that the following changes are more consistent with the National Planning Policy Guidance:

Where **there are concerns that** inadequate foul water treatment and drainage infrastructure exists **to serve a proposed development**, or where such provision cannot be made within the time constraints of planning permission, **it is the responsibility of the developer to demonstrate how foul drainage from the site will be managed**. In some circumstances, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. In certain circumstances, a new development will be required to discharge foul water to the public sewerage system at an attenuated rate.

The first presumption will be for new development to drain to the public sewerage system. Where alternative on-site treatment systems are proposed, it is for a developer to demonstrate that connection to the public sewerage system is not possible in terms of cost and / or practicality and provide details of the responsibility and means of operation and management of the system for its lifetime to ensure the risk to the environment is low.

Justification

6.34 The quality of groundwater and surface waters and associated water-based recreation, fisheries and nature conservation must be protected against the risk of pollution from the inadequate provision of foul water sewerage and sewage treatment facilities. Development proposals which necessitate the use of septic tanks and sewage treatment package plants may, if not designed correctly or located appropriately, result in an increased risk of pollution to groundwater and surface waters. Such systems will only be permitted if it can be demonstrated that connection to the public foul water sewerage system is not feasible, taking into account cost and/or practicability, and where it can be demonstrated that they accord with environmental standards. **The discharge from such systems will also need to comply with the requirements of the Environmental Permitting Regulations.**

Policy GI 3 – Biodiversity & Geodiversity

There is no specific mention of watercourses and wetlands, both are particularly vulnerable to development because of their linear and mobile nature, their interdependence with their catchments; and many of their associated species being reliant on being able to move up and downstream without any blockages to passage.

We would suggest that section 5 could be reworded to include the following comments:

Development which would result in the loss or deterioration of irreplaceable habitats, including **watercourses and wetlands**, ancient woodland

Policy IP 5 – Waste Minimisation and the Recycling of Waste

6.30 Site Waste Management Plan – this is no longer legally required.

Should you wish to meet with us to discuss the suggested changes please do not hesitate to contact me.

Yours sincerely

Mrs Jilly Dougherty
Planning Advisor - Sustainable Places

E-mail clplanning@environment-agency.gov.uk

Mr G Legg
Investment & Policy Manager
Carlisle City Council
Civic Centre
Rickergate
Carlisle
Cumbria
CA3 8QG

Our ref: NO/2013/105568/SE-
01/DS1-L01

Your ref:

Date: 20 April 2015

Dear Mr Legg

Draft Sustainability Appraisal Report & Non Technical Summary

Thank you for your letter of the 3 March 2015 consulting with us on the above report, we have considered the document and I can confirm that we are satisfied that it has been undertaken in line with guidance.

Yours faithfully

Mrs Jilly Dougherty
Planning Advisor - Sustainable Places

E-mail clplanning@environment-agency.gov.uk

Mr Garry Legg –
Investment & Policy Manager
Carlisle City Council
Civic Centre
Rickergate
Carlisle
Cumbria
CA3 8QG

Our ref: NO/2007/100159/OT-
01/SB1-L01
Your ref: Draft IDP
Date: 20 April 2015

Dear Mr Legg

Infrastructure Delivery Plan (March 2015)

Following on from our email of the 19 February and our recent meeting on the 31 March 2015 I can confirm that we are pleased that you have incorporated our suggested comments into the Flood Risk Management & Drainage Infrastructure chapter.

We would like to suggest the following changes to Section 2.11 of the Flood Risk Management & Drainage Infrastructure chapter:

- Gosling Sike - EA have identified upstream storage scheme (FCERM GiA bid made March 2014, [development of business case 2016/2017](#));
- Brampton Beck - Flood alleviation scheme based on upstream storage & possible culvert improvements (FCERM GiA bid made in March 2014, [development of business case 2018/2019](#));
- ~~River Roe (Stockdalewath) - Catchment based approach to flood risk management (FCERM GiA bid made in March 2014); and~~
- ~~Cumrew - Flooding of properties from exceedance of watercourse and surface water (LLFA Flood Investigation Report published. FCERM GiA bid made March 2014 for study).~~

We are suggesting the removal of the River Roe and Cumrew bullet points as these are small schemes in locations where there is not a lot of future development anticipated and it may be possible that communities will see them included and ask why they are not on the list.

We have also included the dates that we intend to develop the business cases for Gosling Sike and Brampton Beck.

Should you wish to meet with us to discuss the above comments please do not hesitate
Environment Agency
Ghyll Mount (Gillan Way) Penrith 40 Business Park, Penrith, Cumbria, CA11 9BP.

to contact me.

Yours sincerely

Mrs Jilly Dougherty
Planning Advisor - Sustainable Places

E-mail clplanning@environment-agency.gov.uk

Mr Garry Legg
Investment & Policy Manager
Carlisle City Council
Civic Centre
Rickergate
Carlisle
Cumbria
CA3 8QG

Our ref: NO/2007/100159/OT-
02/SB1-L01
Your ref: Housing Site Section
Date: 20 April 2015

Dear Mr Legg

Housing Site Selection – Proposed Submission Draft

Thank you for your letter of the 3 March 2015 consulting with us on the above plan, we have considered the document and thank you for incorporating our comments for previous liaisons with yourselves.

We note that the boxed titled 'Flood Risk' does not always relate to Flood Zones 1, 2 and 3 and in some cases the word 'No' has been included. We would recommend that for a consistent approach you use Flood Zones 1, 2 or 3.

Yours sincerely

Mrs Jilly Dougherty
Planning Advisor - Sustainable Places

E-mail clplanning@environment-agency.gov.uk