

## Fiona Kenmare

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**From:** David Miller <davem@north-associates.com>  
**Sent:** 20 April 2015 11:56  
**To:** LPC  
**Subject:** Rep NO 0207 JR JA Workman agetn North Assoc 20 Apr 15  
**Attachments:** Submission pro forma policy SP3 April 2015.pdf; Appendix NA1 - South Carlisle masterplan.pdf; North Associates planning statement Workman estate.pdf

Dear Sir/Madam,

Please find enclosed our representations in respect of policy SP3 (Broad Location for Growth: Carlisle South) on behalf of JA and JR Workman.

Regards,

David Miller BA (Hons) BPL MRTPI  
Planning Director

Telephone: 01200 449707  
Mobile: 07971 330063  
Email: [davem@north-associates.com](mailto:davem@north-associates.com)  
Website: [www.north-associates.com](http://www.north-associates.com)

**Please note our new north west address as of the 2 March 2015**



North Associates (Cumbria) Ltd, Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH.

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## The Carlisle District Local Plan 2015-2030

# Proposed Submission Draft Consultation Representation Form



Images courtesy of Andrew Paterson, D&H Photographers and Jason Friend

## INSTRUCTIONS

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Carlisle City Council  
Civic Centre  
Carlisle  
Cumbria  
CA3 8QG

**To find out more Call:** 01228 817569

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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: JR & JA Workman	Organisation/Company: North Associates
Address:  Postcode:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire  Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

## **PART TWO - YOUR REPRESENTATION**

Please use a separate form for each part of the Proposed Submission Draft Local Plan that you wish to comment on.

### **Q1. To which part of the document does this representation relate?**

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
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### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

Policy SP3 (Broad Location for Growth: Carlisle South)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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#### **Sound?**

<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No
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### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

- ☒ Positively Prepared?
- ☒ Justified?
- ☒ Effective?
- ☒ Consistent with National Policy?

### **Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.**

Please note that your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The Inspector is advised that we represent one of the major land owners with a material interest in the successful development of Carlisle South. Their land interests are shown hatched in red and green on the masterplan that is submitted with this representation.

Whilst we explicitly support the principle of policy SP3 and all that it seeks to achieve for this part of Carlisle, we are nonetheless concerned about the timing of its proposed implementation; the timing of the preparation of the masterplan referred to in the body of the policy; and the element of the policy as drafted that seeks to resist the delivery of individual sites in advance of the masterplan.

Looking initially at implementation, we see no reason why the Council should not look to entertain in a positive fashion some development in advance of 2025 so as to pump-prime the location and announce that what marks the southern gateway to Carlisle is a tangible and deliverable entity that is open for business and inward investment given its strategic location at J42 of the M6, which marks the southern gateway to Carlisle.

Allied to this is of course the consideration of the release of individual sites, or perhaps clusters of sites, that can contribute positively to new housing, job creation and hence growth.

In essence, the policy is considered to lack sufficient flexibility to enable sites within South Carlisle to come forward in advance of the masterplan and subsequent DPD. Given the focus of development within Carlisle (70%) it is important that this area can deliver as early as possible to support the central thrust of the Plan.

We have appended a planning statement and associated masterplan which identifies how our clients' land can contribute to sustainable growth in this strategic location.

**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

It is suggested that the policy becomes less focussed on a point in time (i.e. 2025) and rather efforts be concentrated upon the immediate development of the masterplan and the acceptance of phased delivery via individual sites or clusters of sites.

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**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

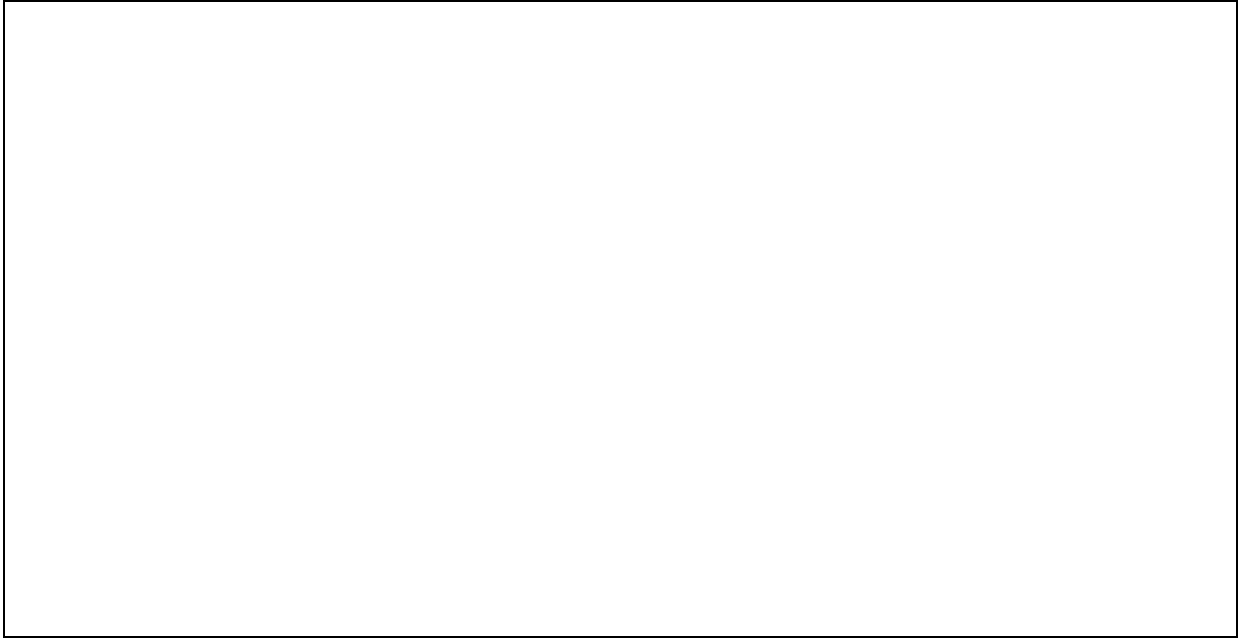
No

**Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?**

- ☐ No, I do not wish to participate at the hearing sessions of the examination  
☒ Yes, I wish to participate at the hearing sessions of the examination

**Q8. If you wish to participate, please outline why you consider this to be necessary:  
Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.**

We represent a major landowner in the Carlisle South area and feel that it is therefore wholly appropriate to express a direct interest in the evolution of policy SP3.



**Thank you for your time to complete and return this Representation form.  
Please keep a copy for future reference.**





**CARLISLE DISTRICT LOCAL PLAN 2015-2030 PROPOSED SUBMISSION DRAFT**

**LAND AT CARLETON/CARLISLE SOUTH**

**PLANNING STATEMENT IN SUPPORT OF SPECIFIC LAND ALLOCATIONS AND INCLUSION WITHIN  
THE CARLISLE SOUTH GROWTH AREA**

**April 2015**

Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH

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[www.north-associates.com](http://www.north-associates.com)

## **1. Introduction**

- 1.1 The parcels of land the subject of this statement (the promotion land) are shown hatched in red (1-3) and green (4) on the appended Carlisle South masterplan.
- 1.2 *Parcel 1* - housing allocation U4 and land to the east.
- 1.3 *Parcel 2* - land north of housing allocation U5.
- 1.4 *Parcel 3* - land south of Garlands.
- 1.5 *Parcel 4* - land adjacent to the River Petteril.
- 1.6 The land the subject of parcels 1 and 2 are the subject of separate representations that we have made for the Inspector's consideration, where specific housing allocations are sought.
- 1.7 Parcel 3 is development land which is proposed for inclusion in the masterplan that the Council intends to develop pursuant to policy SP3 (Carlisle South). It is envisaged that this parcel could provide the opportunity for, in particular, housing and schooling with perhaps the incorporation of local retail provision.
- 1.8 Parcel 4 is a green finger or spine running through the heart of the Carlisle South area to provide necessary open space to support policy SP3.
- 1.9 All of the land within the parcels has been promoted via previous iterations of the emerging Local Plan and the SHLAA.
- 1.10 Given that emerging policy SP3 is designed to deliver a major mixed-use urban extension at Carlisle South to include elements of housing, primary and secondary schools, employment and retail sites, community facilities, open space and other infrastructure, the submitted master plan is not absolute in what it sees as specific land uses for parcel 3. Parcel 4 is self-determining as open space and proximity to the river. Rather, the over-riding purpose of the master plan is to inform the Inspector as to the sizeable land holding our client is able to deliver as a means by which to contribute towards the delivery of the urban extension.

## **2. National Planning Policy Framework (NPPF)**

### Introduction

- 2.1 Planning policy guidance is provided at the national level by the National Planning Policy Framework (NPPF), which was published on the 27 March 2012. The NPPF replaces the vast majority of the previous suite of planning policy statements and sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within

which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 2.2 The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. Planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements.

The presumption in favour of sustainable development

- 2.3 The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 2.4 Policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All 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.

Housing

- 2.5 Paragraphs 47-55 of the Framework relate to housing delivery matters and the need to deliver a wide choice of high quality homes.
- 2.6 Paragraphs 47-48 address a requirement to significantly boost supply and that LPAs should objectively assess the need for market and affordable housing in their Local Plans. Deliverable sites should be identified on an annual basis sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Beyond this, a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15, should be identified.
- 2.7 The promotion land displays the necessary characteristics required by the NPPF to render the land deliverable for new housing and associated community development and open space, in that it is:
- Available now
  - Offers a suitable location for development now
  - Is achievable with a realistic prospect that housing will be delivered on the site within five years.
- 2.8 The land therefore meets, without exception, all of the requisite NPPF deliverability tests and it should therefore be brought forward at the earliest opportunity.

- 2.9 Turning to developability, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Again, the site meets these requirements.
- 2.10 Paragraph 48 makes it clear that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 2.11 Paragraph 50 seeks to encourage the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should:
- Plan for a mix of housing based upon current and future demographic trends; market trends and the needs of different groups in the community.
  - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
  - Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value 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 this need on site with mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

#### Housing summary

- 2.12 The proposed development of the land will deliver a range of new homes, both private and affordable, and associated community facilities, in a location that both the Council and the central thrust of the NPPF recognises as a sustainable means by which to contribute to the delivery of unit numbers and housing choice.
- 2.13 The land meets the deliverable and developable criteria without exception.
- 2.14 The development of the land for new homes and associated community development should therefore be considered in the context of the presumption in favour of sustainable development.

### **3. Summary**

- 3.1 It has been shown that our clients' land holding is deliverable and appropriately located such that the Inspector is respectfully requested to consider favourably its role in the delivery of new homes and associated community development in the Carlisle South Growth Area.

David Miller BA (Hons) BPL MRTPI  
Planning Director

Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH

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[www.north-associates.com](http://www.north-associates.com)



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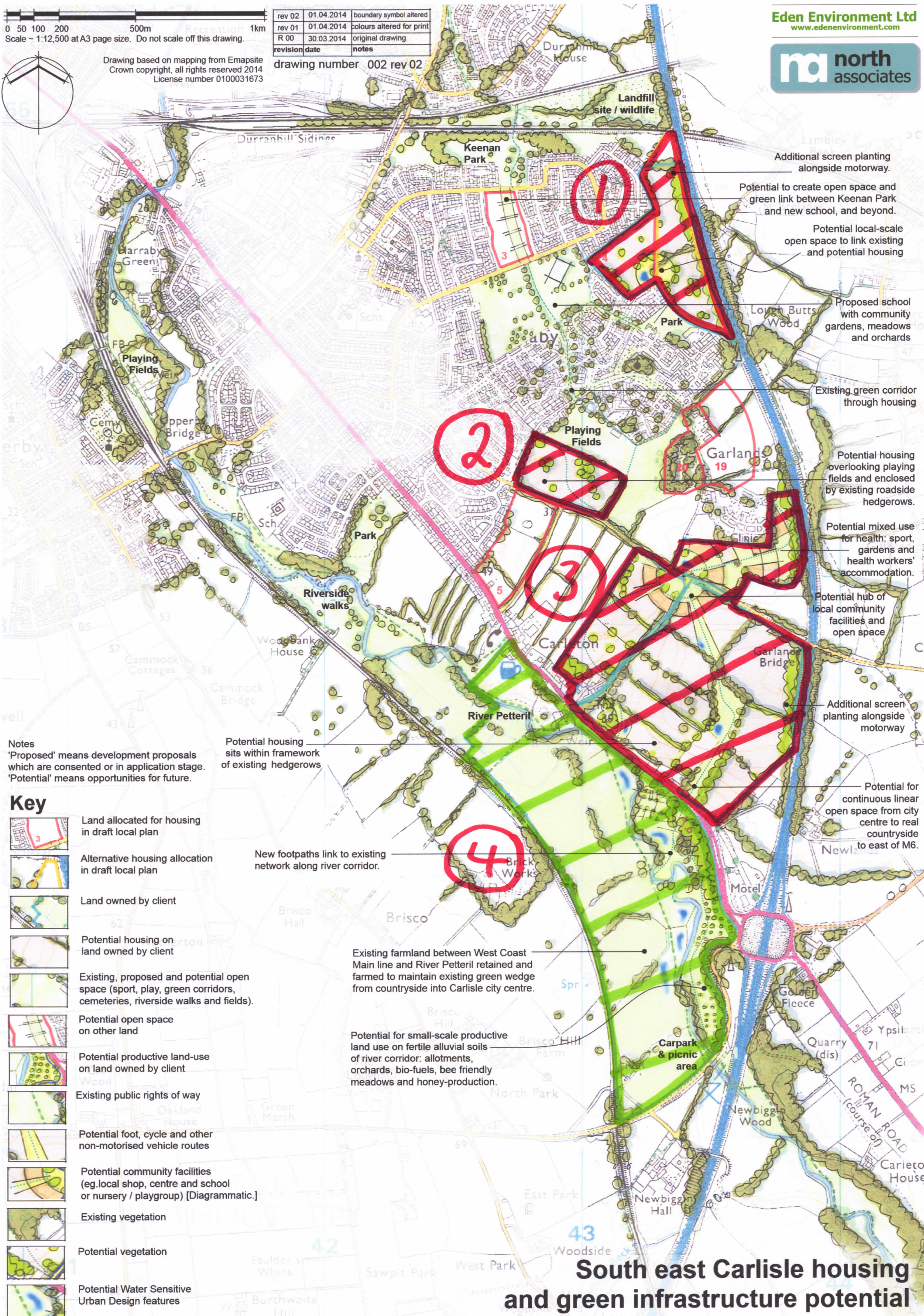
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rev 02	01.04.2014	boundary symbol altered
rev 01	01.04.2014	colours altered for print
R 00	30.03.2014	original drawing
revision	date	notes

drawing number 002 rev 02

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**na** north  
associates



Notes  
'Proposed' means development proposals which are consented or in application stage.  
'Potential' means opportunities for future.

## Key

- Land allocated for housing in draft local plan
- Alternative housing allocation in draft local plan
- Land owned by client
- Potential housing on land owned by client
- Existing, proposed and potential open space (sport, play, green corridors, cemeteries, riverside walks and fields).
- Potential open space on other land
- Potential productive land-use on land owned by client
- Existing public rights of way
- Potential foot, cycle and other non-motorised vehicle routes
- Potential community facilities (eg.local shop, centre and school or nursery / playgroup) [Diagrammatic.]
- Existing vegetation
- Potential vegetation
- Potential Water Sensitive Urban Design features

Potential housing sits within framework of existing hedgerows

New footpaths link to existing network along river corridor.

Existing farmland between West Coast Main line and River Petteril retained and farmed to maintain existing green wedge from countryside into Carlisle city centre.

Potential for small-scale productive land use on fertile alluvial soils of river corridor: allotments, orchards, bio-fuels, bee friendly meadows and honey-production.

Additional screen planting alongside motorway.

Potential to create open space and green link between Keenan Park and new school, and beyond.

Potential local-scale open space to link existing and potential housing

Proposed school with community gardens, meadows and orchards

Existing green corridor through housing

Potential housing overlooking playing fields and enclosed by existing roadside hedgerows.

Potential mixed use for health: sport, gardens and health workers' accommodation.

Potential hub of local community facilities and open space

Additional screen planting alongside motorway

Potential for continuous linear open space from city centre to real countryside to east of M6.

## South east Carlisle housing and green infrastructure potential





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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: JA and JR Workman	Organisation/Company: North Associates
Address:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire
Postcode:	Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

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### **Q1. To which part of the document does this representation relate?**

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
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### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery) - allocation U4 (Moorside Drive/Valley Drive)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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#### **Sound?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
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### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

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- ☐ Justified?
- ☐ Effective?
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The inclusion of housing allocation U4 - Land north of Valley Drive/Moorside Drive is supported. However, please be advised that the site is deliverable within 1-5 years as opposed to the 6-10 stated in the allocation, which is selected in the fact that we have recently prepared and submitted an outline planning application for housing development for this site and that we have firm developer interest.

The said application was submitted on the 27 February 2015 to Carlisle CC and has reference number 16/0161. At the time of writing, the application has yet to be determined as the statutory consultation process is still underway.

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**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

N/A

**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

No

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**Q8. If you wish to participate, please outline why you consider this to be necessary:**

**Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.**

To be able to discuss this site in the context of our representations objecting to the adjoining land to the east (the balance of SHLAA site CA60) not being allocated for housing.

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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: JA and JR Workman	Organisation/Company: North Associates
Address:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire
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### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery) - housing allocation U5

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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#### **Sound?**

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The inclusion of housing allocation U5 - land between Carleton Road and Cumwhinton Road is supported.

Persimmon Homes has prepared and submitted an outline planning application for housing development for the majority of this site. The application reference number is 13/0983. At the time of writing, the application has yet to be determined.

The submission of this application by a significant national house builder supports the selection of this site as a formal housing allocation and, in our view, provides certainty as to the wider attraction of this part of Carlisle for additional housing



growth.

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No

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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname:Miller
Forename:	Forename:David
Organisation/Company:JA and JR Workman	Organisation/Company:North Associates
Address:	Address:Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire
Postcode:	Postcode:BB7 4DH
Contact No:	Contact No:01200 449707/07971 330063
Email:	Email:davem@north-associates.com
Signature: D. Miller	
Date:10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

## **PART TWO - YOUR REPRESENTATION**

Please use a separate form for each part of the Proposed Submission Draft Local Plan that you wish to comment on.

### **Q1. To which part of the document does this representation relate?**

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
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### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery) - allocation U13 (land east of Beverley Rise)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
---	-----------------------------

#### **Sound?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
---	--	-----------------------------

### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

- ☐ Positively Prepared?
- ☐ Justified?
- ☐ Effective?
- ☐ Consistent with National Policy?

### **Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.**

Please note that your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The inclusion of housing allocation U13 - land east of Beverley Rise is supported.

**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

N/A

**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

No

--

**Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?**

- ☒ **No, I do not wish to participate at the hearing sessions of the examination**  
☐ **Yes, I wish to participate at the hearing sessions of the examination**

**Q8. If you wish to participate, please outline why you consider this to be necessary:**

**Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.**

N/A

**Thank you for your time to complete and return this Representation form.  
Please keep a copy for future reference.**





## The Carlisle District Local Plan 2015-2030

# Proposed Submission Draft Consultation Representation Form



Images courtesy of Andrew Paterson, D&H Photographers and Jason Friend

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### **How to respond –**

**Via email:**     [lpc@carlisle.gov.uk](mailto:lpc@carlisle.gov.uk)

**In writing:**    Investment and Policy  
                     Carlisle City Council  
                     Civic Centre  
                     Carlisle  
                     Cumbria  
                     CA3 8QG

**To find out more Call:** 01228 817569

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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: Workman	Organisation/Company: North Associates
Address:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire
Postcode:	Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

## **PART TWO - YOUR REPRESENTATION**

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### **Q1. To which part of the document does this representation relate?**

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
--	------------------------------------	----------------------------------	---------------------------------

### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery) - allocation U14 (land north of Carleton Clinic)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
---	-----------------------------

#### **Sound?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
---	--	-----------------------------

### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

- ☐ Positively Prepared?
- ☐ Justified?
- ☐ Effective?
- ☐ Consistent with National Policy?

### **Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.**

Please note that your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The inclusion of housing allocation U14 - land north of Carleton Clinic is supported.

**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

N/A

**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

No

--

**Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?**

- ☒ **No, I do not wish to participate at the hearing sessions of the examination**  
☐ **Yes, I wish to participate at the hearing sessions of the examination**

**Q8. If you wish to participate, please outline why you consider this to be necessary:**

**Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.**

N/A

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## The Carlisle District Local Plan 2015-2030

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                  Carlisle City Council  
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                  Carlisle  
                  Cumbria  
                  CA3 8QG

**To find out more Call:** 01228 817569



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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: JA and JR Workman	Organisation/Company: North Associates
Address:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire
Postcode:	Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

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<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
--	------------------------------------	----------------------------------	---------------------------------

### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery) - allocation U19 (land at Carleton Clinic)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
---	-----------------------------

#### **Sound?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
---	--	-----------------------------

### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

- ☐ Positively Prepared?
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- ☐ Effective?
- ☐ Consistent with National Policy?

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The inclusion of housing allocation U19 - land at Carleton Clinic is supported.

**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

N/A

**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

No

--

**Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?**

- ☒ **No, I do not wish to participate at the hearing sessions of the examination**  
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**Q8. If you wish to participate, please outline why you consider this to be necessary:**

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Please keep a copy for future reference.**

## Fiona Kenmare

---

**From:** David Miller <davem@north-associates.com>  
**Sent:** 20 April 2015 12:38  
**To:** LPC  
**Subject:** Rep No 0216 workman land north of U5 with assoc docs agent North Associates  
**Attachments:** Submission pro forma objection to failure to allocate land north of allocation U5 Workman April 2015.pdf; Appendix NA1 - land north of allocation U5.pdf; North Associates planning statement Workman estate.pdf

Dear Sir/Madam,

Please find enclosed our various representations in respect of policy HO1 (Housing Strategy and Delivery) – land to the north of housing allocation U5 (Land between Carleton Road and Cumwhinton Road).

Regards,

David Miller BA (Hons) BPL MRTPI  
Planning Director

Telephone: 01200 449707  
Mobile: 07971 330063  
Email: [davem@north-associates.com](mailto:davem@north-associates.com)  
Website: [www.north-associates.com](http://www.north-associates.com)

**Please note our new north west address as of the 2 March 2015**



North Associates (Cumbria) Ltd, Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH.

The information transmitted in this email and any attachment to it is intended only for the person to whom it is addressed and may contain confidential and/or legally privileged material. If you have received this email in error please notify the sender immediately and then delete all copies from your systems. No one other than the named recipient may place any reliance upon it and any further distribution; copying or other use is prohibited.



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CA3 8QG

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Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: JA and JR Workman	Organisation/Company: North Associates
Address:  Postcode:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire  Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	



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### **Q1. To which part of the document does this representation relate?**

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
--	------------------------------------	----------------------------------	---------------------------------

### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
---	-----------------------------

#### **Sound?**

<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No
------------------------------	--	--

### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

- ☒ Positively Prepared?
- ☒ Justified?
- ☒ Effective?
- ☒ Consistent with National Policy?

### **Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.**

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Object to the failure of the Council to allocate land north of housing allocation U5 for housing. The extent and location of the land is shown hatched red on the appended plan.

With reference to the Council's Housing Site Selection Proposed Submission Draft, allocation U5 is summarised as:

"The site is physically and visibly well connected to the existing built edge of Carlisle, and benefits from some existing landscaping in the form of mature hedgerows on its northern, eastern and southern boundaries, and within the site. The single track unclassified road on the south eastern boundary of the site forms an effective edge

between the edge of Carlisle, and Carleton Village to the south. London Road and Carleton Road both have a frequent and regular bus service, and there are neighbourhood shops at both Petteril Bank Road and Central Avenue. The nearest school is Petteril Bank community school at Burnett Road, which is approximately 1.3 km away.

It is therefore evident that the promotion land, which adjoins allocation U5 and runs at 90 degrees to it to the north, is equally appropriate for new housing in this part of Carlisle.

Please also refer to the submitted planning statement which we have prepared in connection with the representations we have made on behalf of our clients' wider land ownership in this part of Carlisle in the context of policy SP3.

A plan is appended to this representation that identifies the site's location in the context of housing allocation U5.

**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

Allocate the land hatched red on the appended plan for housing in the context of housing allocation U5 having established the appropriateness of housing in this area of Carlisle.

--

**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

No

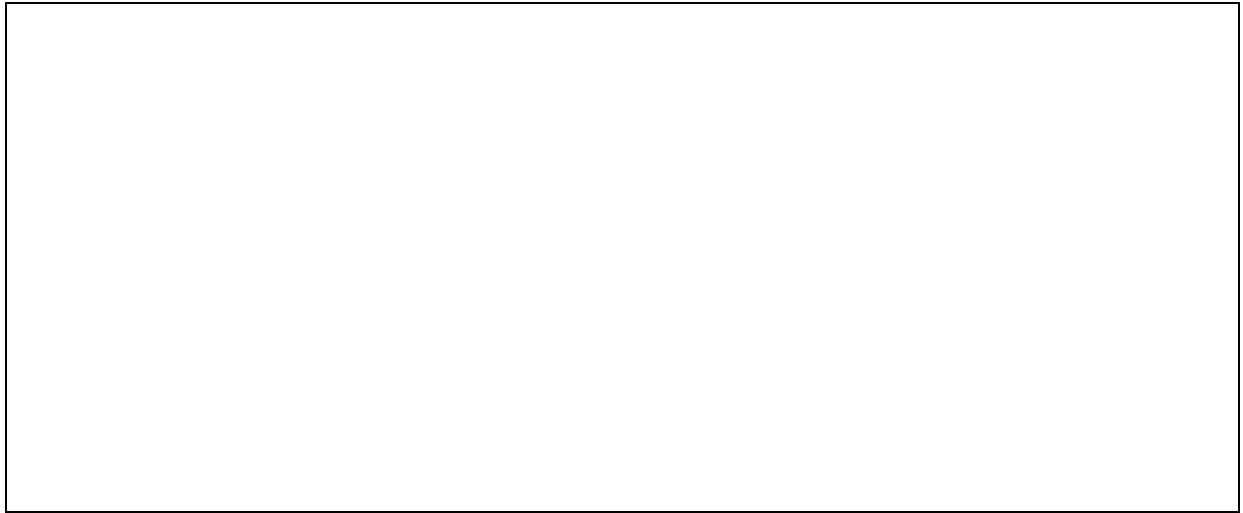
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- ☐ No, I do not wish to participate at the hearing sessions of the examination  
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**Q8. If you wish to participate, please outline why you consider this to be necessary:**

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To be able to discuss the merits of allocating the additional land pursuant to allocation U5.



**Thank you for your time to complete and return this Representation form.  
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**CARLISLE DISTRICT LOCAL PLAN 2015-2030 PROPOSED SUBMISSION DRAFT**

**LAND AT CARLETON/CARLISLE SOUTH**

**PLANNING STATEMENT IN SUPPORT OF SPECIFIC LAND ALLOCATIONS AND INCLUSION WITHIN  
THE CARLISLE SOUTH GROWTH AREA**

**April 2015**

Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH

T 01200 449707 M 07971 330063 E [davem@north-associates.com](mailto:davem@north-associates.com)  
[www.north-associates.com](http://www.north-associates.com)

## **1. Introduction**

- 1.1 The parcels of land the subject of this statement (the promotion land) are shown hatched in red (1-3) and green (4) on the appended Carlisle South masterplan.
- 1.2 *Parcel 1* - housing allocation U4 and land to the east.
- 1.3 *Parcel 2* - land north of housing allocation U5.
- 1.4 *Parcel 3* - land south of Garlands.
- 1.5 *Parcel 4* - land adjacent to the River Petteril.
- 1.6 The land the subject of parcels 1 and 2 are the subject of separate representations that we have made for the Inspector's consideration, where specific housing allocations are sought.
- 1.7 Parcel 3 is development land which is proposed for inclusion in the masterplan that the Council intends to develop pursuant to policy SP3 (Carlisle South). It is envisaged that this parcel could provide the opportunity for, in particular, housing and schooling with perhaps the incorporation of local retail provision.
- 1.8 Parcel 4 is a green finger or spine running through the heart of the Carlisle South area to provide necessary open space to support policy SP3.
- 1.9 All of the land within the parcels has been promoted via previous iterations of the emerging Local Plan and the SHLAA.
- 1.10 Given that emerging policy SP3 is designed to deliver a major mixed-use urban extension at Carlisle South to include elements of housing, primary and secondary schools, employment and retail sites, community facilities, open space and other infrastructure, the submitted master plan is not absolute in what it sees as specific land uses for parcel 3. Parcel 4 is self-determining as open space and proximity to the river. Rather, the over-riding purpose of the master plan is to inform the Inspector as to the sizeable land holding our client is able to deliver as a means by which to contribute towards the delivery of the urban extension.

## **2. National Planning Policy Framework (NPPF)**

### Introduction

- 2.1 Planning policy guidance is provided at the national level by the National Planning Policy Framework (NPPF), which was published on the 27 March 2012. The NPPF replaces the vast majority of the previous suite of planning policy statements and sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within

which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 2.2 The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. Planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements.

The presumption in favour of sustainable development

- 2.3 The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 2.4 Policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All 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.

Housing

- 2.5 Paragraphs 47-55 of the Framework relate to housing delivery matters and the need to deliver a wide choice of high quality homes.
- 2.6 Paragraphs 47-48 address a requirement to significantly boost supply and that LPAs should objectively assess the need for market and affordable housing in their Local Plans. Deliverable sites should be identified on an annual basis sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Beyond this, a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15, should be identified.
- 2.7 The promotion land displays the necessary characteristics required by the NPPF to render the land deliverable for new housing and associated community development and open space, in that it is:
- Available now
  - Offers a suitable location for development now
  - Is achievable with a realistic prospect that housing will be delivered on the site within five years.
- 2.8 The land therefore meets, without exception, all of the requisite NPPF deliverability tests and it should therefore be brought forward at the earliest opportunity.

- 2.9 Turning to developability, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Again, the site meets these requirements.
- 2.10 Paragraph 48 makes it clear that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 2.11 Paragraph 50 seeks to encourage the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should:
- Plan for a mix of housing based upon current and future demographic trends; market trends and the needs of different groups in the community.
  - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
  - Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value 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 this need on site with mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

#### Housing summary

- 2.12 The proposed development of the land will deliver a range of new homes, both private and affordable, and associated community facilities, in a location that both the Council and the central thrust of the NPPF recognises as a sustainable means by which to contribute to the delivery of unit numbers and housing choice.
- 2.13 The land meets the deliverable and developable criteria without exception.
- 2.14 The development of the land for new homes and associated community development should therefore be considered in the context of the presumption in favour of sustainable development.

### **3. Summary**

- 3.1 It has been shown that our clients' land holding is deliverable and appropriately located such that the Inspector is respectfully requested to consider favourably its role in the delivery of new homes and associated community development in the Carlisle South Growth Area.

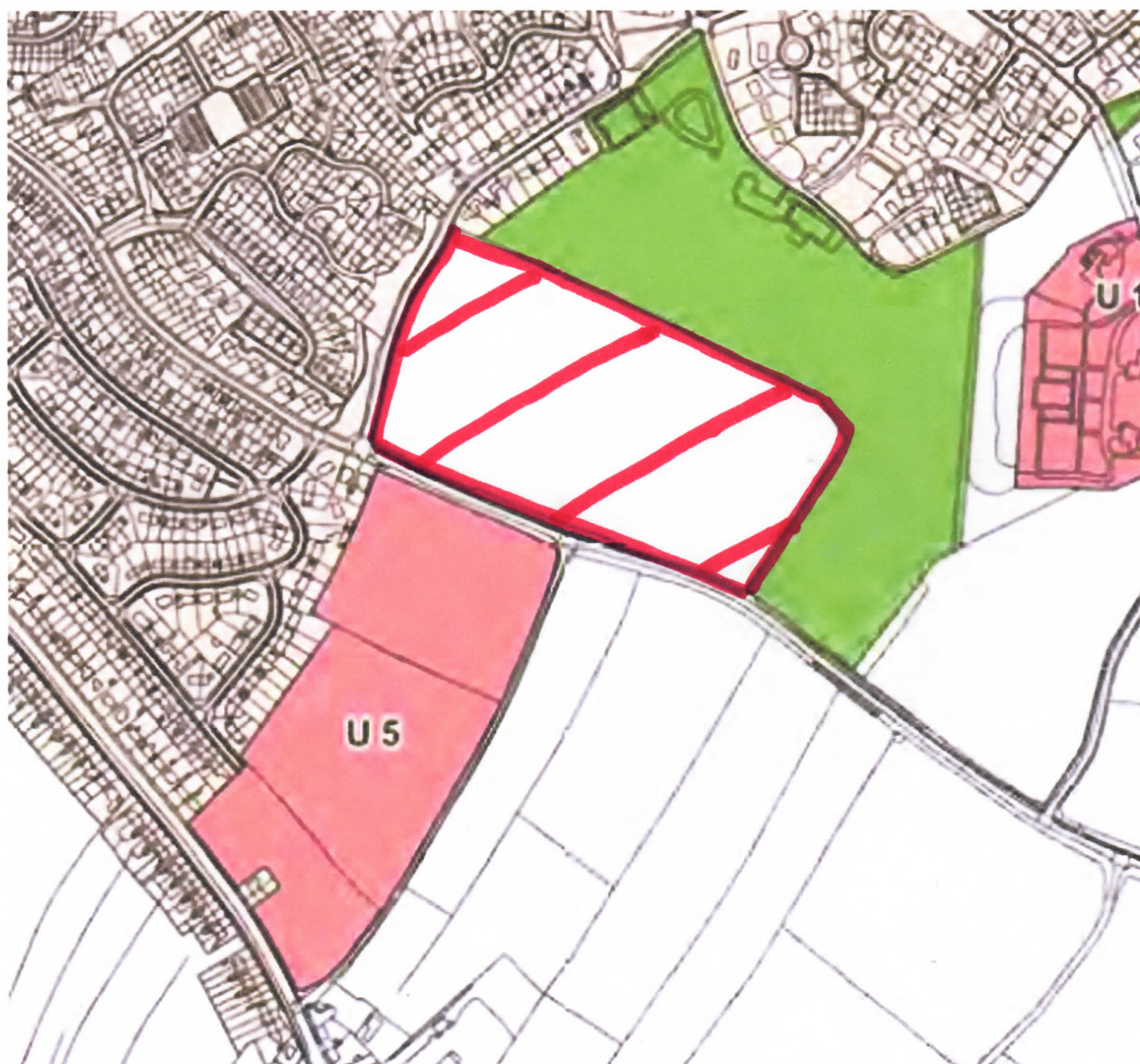


David Miller BA (Hons) BPL MRTPI  
Planning Director

Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH

T 01200 449707 M 07971 330063 E [davem@north-associates.com](mailto:davem@north-associates.com)  
[www.north-associates.com](http://www.north-associates.com)

Appendix NA1 - land to the north of housing allocation U5



## Fiona Kenmare

---

**From:** David Miller <davem@north-associates.com>  
**Sent:** 20 April 2015 12:49  
**To:** LPC  
**Subject:** Rep No 0217 Workman site north of U 4with assoc docs agent North Associates  
**Attachments:** Submission pro forma objection to failure to allocate SHLAA site CA60 Workman April 2015.pdf; Appendix NA1 - land east of U4.pdf; North Associates planning statement Workman SHLAA site CA60.pdf; North Associates planning statement Workman estate.pdf; Indicative landscape structure allocation U4 additional phase.pdf; Appendix NA1 - South Carlisle masterplan.pdf

Dear Sir/Madam,

Please find enclosed our various representations in respect of policy HO1 (Housing Strategy and Delivery) – land to the east of housing allocation U4 (Land north of Moorside Drive/Valley Drive).

Regards,

**David Miller BA (Hons) BPL MRTPI**  
**Planning Director**

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Email: [davem@north-associates.com](mailto:davem@north-associates.com)  
Website: [www.north-associates.com](http://www.north-associates.com)

**Please note our new north west address as of the 2 March 2015**



North Associates (Cumbria) Ltd, Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH.

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## The Carlisle District Local Plan 2015-2030

# Proposed Submission Draft Consultation Representation Form



Images courtesy of Andrew Paterson, D&H Photographers and Jason Friend

## INSTRUCTIONS

**Before you start, you are advised to read the Guidance Note published separately alongside this form.**

Please note all representations must be received by no later than Monday **20<sup>th</sup> April 2015**. There are no guarantees that any representations received after this deadline can be accepted.

For all representations parts one and two of this form should be completed. Should you wish to make more than one representation, please fill in and submit a separate form for each.

A copy of the Proposed Submission Draft Local Plan and all supporting documentation is available to view at [www.carlisle.gov.uk/localplan](http://www.carlisle.gov.uk/localplan)

### **How to respond –**

**Via email:** [lpc@carlisle.gov.uk](mailto:lpc@carlisle.gov.uk)

**In writing:** Investment and Policy  
Carlisle City Council  
Civic Centre  
Carlisle  
Cumbria  
CA3 8QG

**To find out more Call:** 01228 817569

## **PART ONE- YOUR DETAILS**

It is important that you fill in your contact details below; **we cannot register your representation without your details**. Please note that we will not be able to keep your representation or personal details confidential. We may also wish to contact you to clarify your representation.

In circumstances where there are individuals/ groups/ organisations who share a similar view on the plan, it would be helpful if individuals/ groups/ organisations make a single representation. It would also be useful if the group/organisation state how many people the submission is representing and how the representation was authorised.

<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: JA and JR Workman	Organisation/Company: North Associates
Address:  Postcode:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire  Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

## **PART TWO - YOUR REPRESENTATION**

Please use a separate form for each part of the Proposed Submission Draft Local Plan that you wish to comment on.

### **Q1. To which part of the document does this representation relate?**

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
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### **Please specify which Policy, Paragraph, Chapter or Figure you are referring to:**

HO1 (Housing Strategy and Delivery)

### **Q2. Do you consider that the Local Plan is:**

#### **Legally Compliant?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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#### **Sound?**

<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No
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### **Q3. If you consider the Local Plan is unsound, is it because it is not:**

- ☒ Positively Prepared?
- ☒ Justified?
- ☒ Effective?
- ☒ Consistent with National Policy?

### **Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.**

Please note that your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Object to the failure of the Council to allocate land the subject of SHLAA reference CA60 to form an additional phase to housing allocation U4.

With reference to the Council's Housing Site Selection Proposed Submission Draft, allocation U4 is summarised as:

"This site was allocated for housing in a previous Local Plan, as part of a larger allocation, which is now fully developed and known as Carlton Grange. The 2008 Local Plan omitted this site in error, although at the Local Plan Inquiry the Inspector considered that the site should be reviewed through the next (current) Local Plan process. The land is available, relates well to existing urban form, and is located in a neighbourhood that benefits from a range of local services and facilities including



public transport, primary school, churches, open space, play areas and a good range of neighbourhood shops. Careful consideration will need to be given to the design and layout of the site to ensure that the boundaries between the existing housing and the new development integrate in design terms, whilst giving adequate separation distances.

In our view, it is therefore evident that the promotion land, which adjoins allocation U4 on its eastern boundary and is within the same ownership, is equally appropriate for new housing as an additional phase to it.

Please also refer to the submitted planning statements we have prepared in respect of this site and then our clients' wider land ownership in this part of Carlisle in the context of policy SP3.

A plan is appended to this representation that identifies the site's location in the context of housing allocations U4 and U13.

**Q5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

Allocate land the subject of SHLAA reference CA60 (hatched in red on the appended plan) to form an enlarged allocation to U4.



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**Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?**

No

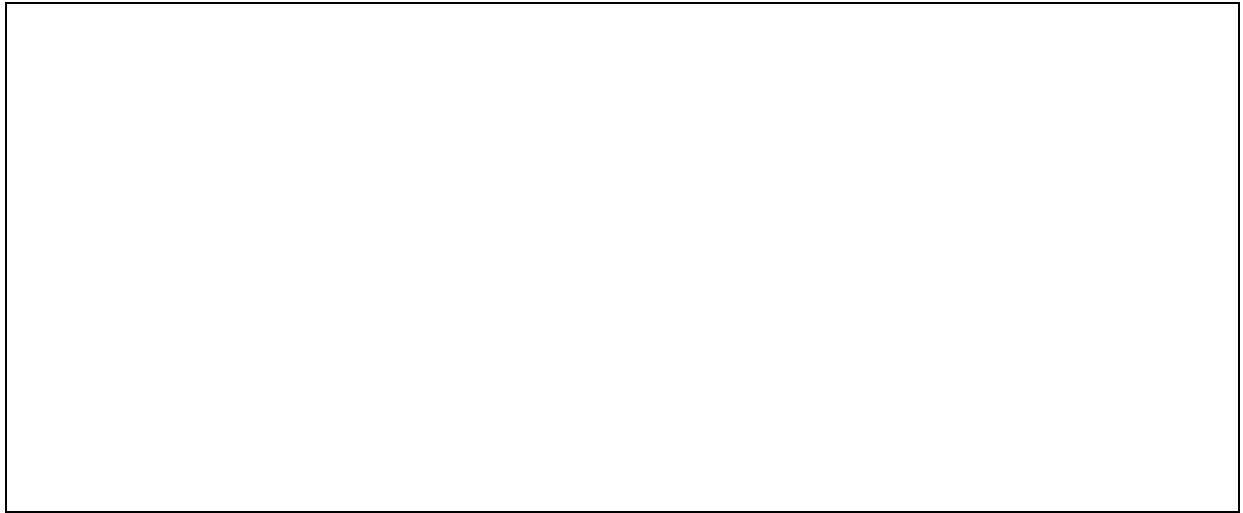
**Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?**

- ☐ No, I do not wish to participate at the hearing sessions of the examination  
☒ Yes, I wish to participate at the hearing sessions of the examination

**Q8. If you wish to participate, please outline why you consider this to be necessary:**

**Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.**

To be able to discuss the merits of allocating the additional land as a further phase to allocation U4.



**Thank you for your time to complete and return this Representation form.  
Please keep a copy for future reference.**



**CARLISLE DISTRICT LOCAL PLAN 2015-2030 PROPOSED SUBMISSION DRAFT**

**LAND OFF MOORSIDE DRIVE/VALLEY DRIVE (PHASE TWO),CARLISLE**

**PLANNING STATEMENT IN SUPPORT OF A PROPOSED ALLOCATION FOR HOUSING  
DEVELOPMENT**

**April 2015**

Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH

T 01200 449707 M 07971 330063 E [davem@north-associates.com](mailto:davem@north-associates.com)  
[www.north-associates.com](http://www.north-associates.com)

## 1. INTRODUCTION

- 1.1 This land the subject of this statement (the promotion land) comprises the area that is hatched in red on the plan extract shown below.



## 2. THE SITE AND SURROUNDINGS

- 2.1 The promotion land comprises circa 9ha (22 acres) of grazing land. It is bound to the north by housing allocation U13, to the west by existing housing development and by housing allocation U4, to the south by open space and existing housing development, and to the east by the M6 corridor.
- 2.2 The land lies within what is an established urban area of Carlisle and it is wholly contained by very robust and well-defined boundaries, in an area that is characterised by existing housing development and indeed proposed housing development. The land is available, relates well to existing urban form, and is located in a neighbourhood that benefits from a range of local services and facilities, including: public transport, primary school, churches, open space, play

areas and a good range of neighbourhood shops. Carlisle City Centre lies just 3km (2 miles) to the north west.

2.3 Vehicular access to the land would be provided via housing allocation U4 and/or a connection to the south of the site.

2.4 For the avoidance of doubt, housing allocation U4 is owned and controlled by our client therefore deliverability of both U4 and the promotion land is not in question.

### **3. PLANNING HISTORY**

3.1 There is no recorded planning history for the promotion land albeit we have recently submitted an outline planning application for housing development on allocation U4. This is referenced in our separate representation in respect of supporting U4.

### **4. NATIONAL PLANNING POLICY FRAMEWORK (NPPF)**

#### **4.1 Introduction**

4.1.1 Planning policy guidance is provided at the national level by the National Planning Policy Framework (NPPF), which was published on the 27 March 2012; and the subsequent suite of guidance, updated from time to time, in the form of Planning Practice Guidance.

4.1.2 The NPPF replaces the vast majority of the previous suite of planning policy statements and sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

4.1.3 The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. Planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements.

#### **4.2 The presumption in favour of sustainable development**

4.2.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

4.2.2 The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an

up-to-date local plan should be approved, and proposed development that conflicts should be refused unless relevant material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.

4.2.3 The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

4.2.4 For decision-taking on planning applications, this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
- Specific policies in the Framework indicate development should be restricted.

4.2.5 Policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All 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.

#### 4.3 Housing

4.3.1 Paragraphs 47-55 of the Framework relate to housing delivery matters and the need to deliver a wide choice of high quality homes.

4.3.2 Paragraphs 47-48 address a requirement to significantly boost supply and that LPAs should objectively assess the need for market and affordable housing in their Local Plans. Deliverable sites should be identified on an annual basis sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Beyond this, a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15, should be identified.

4.3.3 The promotion land is referenced in the Council's current SHLAA, which is consistent with it being delivered as a new housing site. The NPPF states that, for sites to be considered deliverable, they should be:

- Available now
- Offer a suitable location for development now
- Be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.

The promotion land meets, without exception, all of these requisite tests and it should therefore be brought forward at the earliest opportunity.

4.3.4 Turning to developability, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Again, the site meets these requirements.

4.3.5 Paragraph 48 makes it clear that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

4.3.6 Paragraph 50 seeks to encourage the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should:

- Plan for a mix of housing based upon current and future demographic trends; market trends and the needs of different groups in the community.
- Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
- Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value 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 this need on site with mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

#### 4.4 Housing summary

- 4.4.1 The allocation of the promotion land will deliver a range of new homes, both private and affordable, on a site that the Council and the central thrust of the NPPF supports as a means by which to contribute to the delivery of unit numbers and housing choice.
- 4.4.2 The land meets the deliverable and developable criteria without exception.
- 4.4.3 The allocation of the land for new homes should therefore be considered in the context of the presumption in favour of sustainable development.

#### 4.5 Transport

- 4.5.1 Paragraphs 29-41 relate to transportation matters. Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
- 4.5.2 All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:
- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.
  - Safe and suitable access to the site can be achieved for all people.
  - Improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 4.5.3 For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.



#### 4.6 Transport summary

- 4.6.1 The promotion land is situated in a sustainable location and hence it would be very accessible on foot, by cycle and public transport. Accordingly, the proposals comply with the NPPF and current local transport policy.
- 4.6.3 The local highway network would easily be able to accommodate the proposed development traffic and the proposed development is acceptable in highway, traffic and transportation terms.
- 4.6.4 Allocation of the land would therefore be consistent with section 4 of the NPPF and the residual impact of the development will certainly not be severe, which paragraph 32 seeks to avoid. As such, the proposed allocation is a logical extension to allocation U4 and reasonable and appropriate for the location such that there are no highways related issues that would prevent the proposals being approved.

#### 5. **STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) SEPTEMBER 2012**

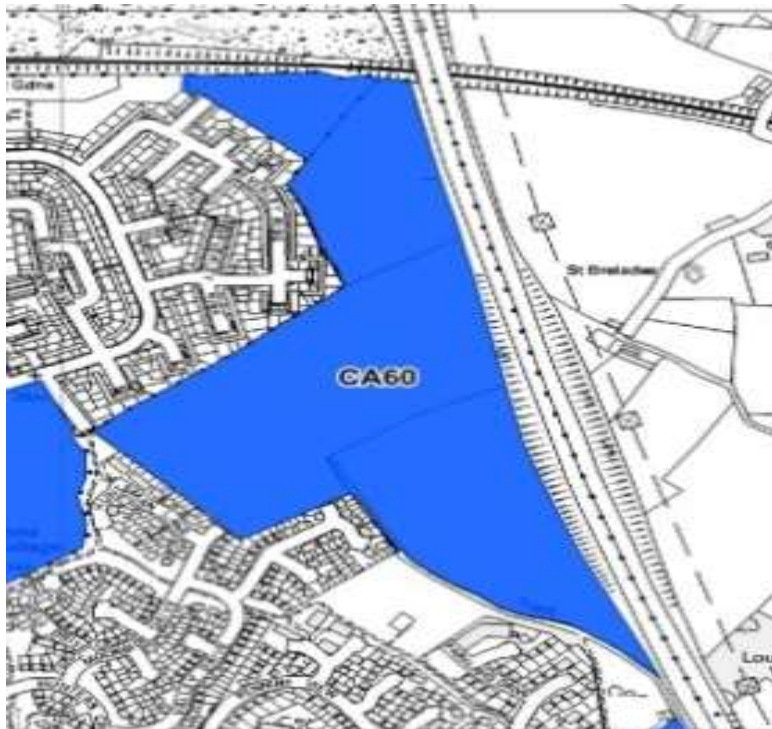
- 5.1 The promotion land is referenced in the SHLAA as forming part of the wider area of site CA60, which also includes housing allocation U4. The Council states in this iteration of the SHLAA that the land represents deliverable housing land.
- 5.2 The Council only included settlements containing deliverable or developable sites (as defined by paragraph 47 footnotes to the NPPF) in the SHLAA.
- 5.3 The Council colour coded the various sites to identify which were considered to be either deliverable or developable. Deliverable sites, which includes the current application site, are those that can deliver new housing within years 1-5 (2015-2019) of the emerging Carlisle District Local Plan being adopted. Developable sites are those sites that are likely to deliver new housing in years 6-15 (2020 and beyond). The plan extract overleaf is taken from the SHLAA:



SHLAA extract: September 2012 update

## 6. STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) CONSULTATION DRAFT DECEMBER 2014

- 6.1 The Council produced an updated SHLAA in the winter of 2014. The promotion land is again referenced as forming part of the wider area of site CA60, which again includes housing allocation U4. The Council states in this iteration of the SHLAA that the site represents deliverable housing land.



SHLAA extract: December 2014 update

## **7. SUMMARY AND CONCLUSIONS**

- 7.1 The promotion land comprises circa 9ha (22 acres) of grazing land. It is bound to the north by housing allocation U13, to the west by existing housing development and by housing allocation U4, to the south by open space and existing housing development, and to the east by the M6 corridor.
- 7.2 The land lies within what is an established urban area of Carlisle and it is wholly contained by very robust and well-defined boundaries, in an area that is characterised by existing housing development and indeed proposed housing development. The land is available, relates well to existing urban form, and is located in a neighbourhood that benefits from a range of local services and facilities, including: public transport, primary school, churches, open space, play areas and a good range of neighbourhood shops. Carlisle City Centre lies just 3km (2 miles) to the north west.
- 7.3 Vehicular access to the land would be provided via housing allocation U4 and/or a connection to the south of the site.
- 7.4 For the avoidance of doubt, housing allocation U4 is owned and controlled by our client therefore deliverability of both U4 and the promotion land is not in question.
- 7.5 NPPF – at the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 7.6 Allocation of the land will deliver a range of new homes, both private and affordable, on land that both the Council and the central thrust of the NPPF supports as a means by which to contribute to the delivery of unit numbers and housing choice. Indeed, it will provide a natural continuation of allocation U4, which is the subject of a current planning application, and it would also incorporate housing allocation U13 to the north west corner.
- 7.7 There is then an excellent opportunity here to provide a strategic approach to the provision of a quality open space regime given the extent of land owned by our clients, as opposed to simply providing the requisite quantum of space within the extent of allocation U4. This is shown on the indicative landscape structure drawing that has been appended and which has also been submitted to the Council with the current outline planning application.
- 7.8 The allocation of the land for new homes should therefore be considered in the context of the presumption in favour of sustainable development.

7.9 The Inspector is respectfully requested to consider favourably the allocation of this land as a means by which to deliver new market, affordable homes and open space as a further phase to allocation U4.

**David Miller BA (Hons) BPL MRTPI**  
**Planning Director**

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Appendix NA1 - land to the east of housing allocation U4

