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Meeting Date:

# Report to Economy and Environment Overview and Scrutiny Panel

Agenda

Item:

**A.2** 

Meeting Date.	2011 00110 2010
Portfolio:	Economy and Enterprise
Key Decision:	Yes: Recorded in the Notice Ref:KD
Within Policy and	
Budget Framework	YES
Public / Private	Public
Title:	LOCAL PLAN - LAND ALLOCATIONS
Report of:	Director of Economic Development

ED 15/13

25th June 2013

## Purpose / Summary:

**Report Number:** 

This report sets out the Preferred Options for land allocations for development in Carlisle District over the period 2015 - 2030. Together with the planning policies brought before Executive on  $31^{st}$  May is will form the Carlisle District Local Plan.

The Panel is asked to consider:

- whether Policy S2 is the right approach to deliver the Council's aspirations for sustainable development;
- whether the focus of Policy S5 reflects the Council's commitment to the City Centre;
- whether Policy 1creates the right framework to deliver economic growth;
- whether the location of proposed housing sites is the right approach for the future to deliver the Local Plan housing target;

## **Recommendations:**

That the Panel's findings are included in an amended report to be considered by Executive on 15<sup>th</sup> July in order to finalise the Local Plan Land Allocations for referral to Council on 16<sup>th</sup> July, (together with the Preferred Options Local Plan policies) for approval for public consultation from 29<sup>th</sup> July for a seven week period.

## Tracking

Executive:	
Overview and Scrutiny:	
Council:	

## 1. BACKGROUND

- **1.1** Preparation of the CDLP has been ongoing since 2010, during which time an extensive evidence base has been produced, covering topics as diverse as flooding, travellers, renewable energy and the viability of affordable housing requirements. There has also been extensive engagement with local communities and stakeholders, and two consultation exercises on the Key Issues, and the Issues and Options.
- **1.2** At that time, officers were working on producing a Local Development Framework, (a suite of separate documents including a Core Strategy, Development Control policies and Site Allocations), each with its own time frame. However, a change to the planning system was brought about by the Government in March last year in the form of the NPPF. This resulted in the requirement for local planning authorities to produce <u>a</u> local plan.
- **1.3** The CDLP will therefore set out a strategy and policies for the long-term vision for Carlisle, detailed development management policies and site allocations for a range of uses including housing.
- 1.4 The Development Management and strategic policies and vision were brought to Executive on 31<sup>st</sup> May 2013. Together with the site allocations for development in this report, they will form the CDLP 2015 2030. The Plan will provide a statutory planning policy framework for Carlisle District which will provide developer and community confidence in decision making. This framework will enable the development and expansion of quality homes and businesses, the delivery of infrastructure, and help to foster a wider cultural and leisure offer.

## 2. PROPOSALS

- 2.1 This report identifies the Preferred Options for sites to be allocated for a range of development including housing, employment and community uses up to 2030. The allocations will help to meet the objectives of the strategic housing and employment policies. Work is also currently being undertaken on a City Centre Masterplan, following the findings in the retail study that by 2021 Carlisle could accommodate an additional 16 900sq m of retail floorspace.
- **2.2** The attached maps show preferred locations for a range of housing to meet the needs of current and future population, employment sites and a health centre at Brampton. These allocations will form part of the Local Plan Policies Map, which

will also show existing established land uses such as areas of housing, employment, retail etc, and areas of land which are protected such as parks, playing fields, other protected landscapes and sites which are important for nature conservation.

- **2.3** The Preferred Options Site Allocations have been identified through a variety of sources including:
  - sites previously assessed and consulted on through the SHLAA;
  - sites recently submitted to the Council;
  - a review of land allocations in the current Local Plan;
  - a review of sites in other corporate strategic documents such as the Asset Management Plan.
  - Carlisle Employment Land Study
  - Carlisle Retail Study
- 2.4 In terms of housing, all of the Preferred Options site allocations put forward in this report are required in order for the Council to meet its proposed annual housing target of 550-650 per year, with a urban/rural split of 70/30%. The effect of removing a site will be the need to allocate an equivalent alternative elsewhere.
- 2.5 Some of the sites are part of much larger sites put forward through the SHLAA process, particularly in the rural area, where a number of large sites were submitted for assessment. Given the need to ensure that rural allocations reflect the scale, form, character and function of a village and landscape in which they are located, a number of rural housing allocations are small sections of much bigger sites which were originally submitted.
- **2.6** Within and around the urban area of Carlisle, the sites have been allocated taking into account infrastructure capacity issues such as highways, the potential of the sites to integrate with the existing urban form, and in the case of the two sites adjacent to the former NCTC in Harraby, the need to deliver a reconfigured and enlarged primary school and associated community facility.
- 2.7 Within the rural area, the sites reflect a move away from a hierarchical approach to settlements, and respond to policy in the NPPF which recognises that villages work in clusters, with development in one village having the potential to sustain services in a village nearby.

- **2.8** As the Council can currently demonstrate a five year housing supply with an additional buffer of 20%, it has not been considered necessary to allocate sites for development in the first five years of the Plan period.
- 2.9 The Preferred Options site allocations are intended to come forward in years 6 10 of the plan period. For years 11 15, i.e. 2025 2030, a broad location for growth has been identified in the area of Carlisle south, spreading westwards from junction 42 of the M6 to Durdar, with potential to expand further in a later plan period. The ultimate aim of this area of development would be to enable the construction of a southern relief road, linking junction 42 with the newly opened western relief road, (CNDR).
- 2.10 The following sets out the Strategic Housing policy for the Local Plan, (the first part of which was brought to Executive on 31<sup>st</sup> May), together with a table setting out the housing allocations for the District, including site size and indicative yield. The reasoned justification which will explain the policy in the Local Plan is also included. This is followed by a more detailed description for each site. The maps at Appendix 1 set out the locations of the sites, and a summary of the key points.
- 2.11 When the Preferred Options site allocations are released for consultation, a number of assessments, required to be undertaken alongside the Local Plan, will be published at the same time. These will include a Sustainability Appraisal, a Habitats Regulations Assessment, and Equalities Impact Assessment and a Health Impact Assessment.
- 2.12 Following on from the Preferred options, the next stages in the plan preparation are:
  Publication winter 2013 (comments can only be made on the 'soundness' of the plan, not general comments about the content and wording of policies)
  Submission Spring 2014 (plan submitted to the Secretary of State)
  Examination summer 2014 (independent examination by Inspector)
  Adoption winter 2014.

## 3. CONSULTATION

3.1 A seven week consultation is proposed between 29<sup>th</sup> July and 16th September 2013. A consultation strategy has been drawn up with the Communications Team to ensure that a range of opportunities are available to engage the public and stakeholders.

## 4. CONCLUSION AND REASONS FOR RECOMMENDATIONS

4.1 Approval for the Preferred Options Site Allocations will enable the whole Local Plan, (policies and allocations), to meet the timescale set out in the Planning Service Project Plan. Having an up to date Local Plan is a central requirement of Government Planning policy, and provides an effective policy framework to guide development over the plan period, and on which to make decisions on planning applications. It also gives certainty and confidence to developers and the community.

## 5. CONTRIBUTION TO THE CARLISLE PLAN PRIORITIES

- **5.1** The Local Plan will enable the delivery of key elements of the vision within the Carlisle Plan, in particular:
  - support the growth of more high quality and sustainable business and employment opportunities;
  - address Carlisle's current and future housing needs;
  - develop vibrant sports, arts and cultural facilities.

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Appendices attached to report:	Appendix 1 – Local Plan land allocat Appendix 2 – Site Plans	ions.	

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers:

• Executive report ED 14/13;

## CORPORATE IMPLICATIONS/RISKS:

Chief Executive's - The Local Plan will help to deliver the objectives of the Carlisle Plan.

**Community Engagement** – The Local Plan policies will help deliver the housing strategy and address community issues when development proposals are considered.

**Economic Development** – The Local Plan provides the basis for delivering economic growth and guiding development proposals throughout the District.

**Governance** – The Local Plan is prepared under the Planning and Compulsory Purchase Act 2004 and the Planning Act 2008 (as amended by the Localism Act 2011).

**Local Environment** – the Local Plan has policies to protect and enhance both landscape and biodiversity in the local environment, in both built up areas and the wider countryside.

**Resources -** The preferred options report is produced within the Council's own planning policy resources with the use of existing budgets to undertake the required evidence base.

## Appendix 1

# Executive report ED 14/13 – Carlisle District Local Plan 2015 – 2030 land allocations consultation.

#### 1.0 Introduction

1.1 The Local Plan has to identify specific sites that are suitable for housing, employment and other uses such as retail or health, in order to meet the identified needs of the area and deliver the Plan's strategy. The NPPF states that pursuing sustainable development requires careful attention to viability.

## 2.0 Viability of the Plan

- 2.1 The Local Plan should be deliverable. The NPPF states that the allocated sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 2.2 Current advice on viability testing of Local Plans concentrates mainly on the costs of providing affordable housing. As such the Council has undertaken an Affordable Housing Economic Viability Assessment, which is part of its evidence base and available on the web site. The purpose of the study was to establish the appropriate level of affordable housing to be required on sites across the District, having regard to the likely economic viability of land for housing within the area.
- 2.3 To assess affordable housing viability across the District, the study used a traditional residual appraisal method, which is widely recognised as the preferred method to assess viability.
- 2.4 The evidence in this study has been used to inform Policy 24 Affordable Housing, which makes provision for different requirements across different zones. The map which accompanies this policy was omitted from the Local Plan preferred options policies report currently progressing through the committee cycle, and is therefore attached at the end of the allocated housing sites.
- 2.5 It is recognised that further work will be required on viability as the Plan progresses through Preferred Options to publication, in particular a more detailed examination of polices other than the affordable housing policy, to determine whether there is likely to be a cost implication for development. In particular,

Policy 35 – Delivering Infrastructure, Policy 38 – Broadband Access, Policy 42 Planning Obligations, Policy 45 – Development Energy Conservation and Efficiency and Policy 67 – Open Space.

#### 3.0 Site Allocations

- 3.1 Proposed sites for development will be shown as allocations on the Local Plan policies map. The map will also show existing land uses such as areas of housing, employment and the City Centre, and areas of protected land such as parks and playing pitches, amenity open space, nature conservation sites and the two Areas of Outstanding Natural Beauty in the District.
- 3.2 In relation to existing land uses, some designations will not be transferred over to the new Local Plan Policies Map, as follows:

#### 3.3 Offices

- 3.4 In relation to existing offices in the City Centre, they are currently shown as Primary Office Area. The current Local Plan has a policy relating to office development within this area. Discussions with Development Management officers have highlighted that there is an issue with vacant offices which are for sale or to let. It is considered beneficial to allow a wider range of uses in these circumstances, to increase the vibrancy of these areas.
- 3.5 Within the NPPF offices are defined as a main town centre use. It is considered that policy within the NPPF relating to commercial development is sufficient to decide any planning applications, and that a separate local plan policy and map designation is not required.
- 3.6 Within the rural area, small scale rural offices are not subject to a sequential approach, i.e. they are not subject to a 'town centre first' approach. Provision for rural offices is made in Policy 15 Rural Diversification. This approach complies with Government policy in the NPPF.

#### 3.7 Urban Fringe Landscape

- 3.8 The Urban Fringe Landscape definition on the current Local Plan proposals map was intended to protect the open character of the area and protect them from pressure from development. Feedback from the Issues and Options stage of the Plan indicated community support for a criteria based landscape policy that would protect and enhance all landscapes, not just those covered by specific designations.
- 3.9 Therefore Policy 64 Landscape, sets out an approach whereby all proposals for development are assessed against the surrounding landscape's key

characteristics, local distinctiveness and capacity for change, using the Cumbria Landscape Character Assessment and Toolkit. This provides decision makers with the means to assess the impact of a development on any of the different landscape character areas in the district.

3.10 As such, Urban Fringe Landscape will not be shown on the new Local Plan Policies Map.

#### 3.11 Settlement boundaries

- 3.12 The current adopted Local Plan shows settlement boundaries for Carlisle, Brampton, Longtown and 20 rural villages. In the rural areas in particular, settlement boundaries were very tightly drawn, resulting in limited scope for new development.
- 3.13 Feedback received so far, in particular through the Issues and Options consultation, and the Rural Masterplanning consultations has highlighted that many communities consider that settlement boundaries are too restrictive.
- 3.14 The NPPF advocates a significant shift away from a hierarchical approach, and does not advocate the use of settlement boundaries, stating that:

"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example where there are groups of smaller settlements, development in one village may support services in a village nearby".

- 3.15 National policy also states that in rural areas local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing.
- 3.16 As such settlement boundaries will not be shown on the Local Plan Policies Map.

#### 3.17 New allocations

- 3.18 The allocations form part of the overall Local Plan for Carlisle District, which will cover the period 2015 2030. The allocations need to be read in conjunction with the relevant policy which will set out criteria that any planning applications will need to comply with. (The policies were previously presented to JMT on 30<sup>th</sup> April).
- 3.19 By setting out specific land allocations in this way, the Plan will provide local communities, land owners, developers and infrastructure providers with a clear indication of the future pattern of development across the district. They indicate that the principle of development on such sites is acceptable.

- 3.20 With reference to the proposed housing allocations, it has been important to ensure that the sites are deliverable over the Plan period. To be considered deliverable, sites should be available and offer a suitable location for development now, and be achievable with a realistic prospect that housing can be delivered on the site within five years. In particular, development of the site must be viable.
- 3.21 The Council can currently demonstrate at least a five year supply of housing land + 20%, and therefore there is no requirement to allocate sites for housing for the first five years of the Plan period. The allocations are therefore intended to be brought forward in years 6 – 10.
- 3.22 The table below sets out the proposed sites, the site size and the indicative yield. The yield has been calculated using a net density of 30/ha as a baseline, and then taking into account any site constraints such as site shape, topography and permanent features.
- 3.23 The table needs to be read in conjunction with the following plans which show the preferred allocations, alternative options, and also recently submitted SHLAA sites, (which have not yet been subject to a site assessment).

The following text is as it will appear in the Local Plan and has therefore not been paragraph numbered.

#### Policy 21- Housing Strategy and Delivery

#### Planning permission will be granted for housing proposals that will:

- **1.** Contribute to achieving an average annual district housing target of 550 650 houses per year;
- **2.** 70% of all new housing development will be located in the urban area of Carlisle, and 30% in the rural area;
- **3.** Provide a mix of dwelling types, sizes and tenures which help meet identified local housing need and contribute to the development of mixed and sustainable communities;
- **4.** Provide specialist housing for vulnerable people including for the ageing population such as extra-care accommodation in sustainable locations, taking account of the need to provide for a variety of care needs and flexibility to accommodate differing requirements of ageing care;
- **5.** Contribute to the development of brownfield sites which are in sustainable locations;

## Housing Allocations for Carlisle District

Overall District target:	550/650 per year		
Windfall allowance @ 50/year	750		
Net planning permissions outstanding:	3471		
Less 2 year's potential completions:	900		
Sites to be allocated:			
Urban:	Area: (hectare)	Yield:	
Land to the south east of junction 44 – Carl 01	8.03	217	
Site of Pennine Way Primary School – Carl 02	3.57	112	
Land south of Edgehill Road, adjacent to former NCTC – Carl 03	4.37	130	
Land north of Moorside Drive/Valley Drive – Carl 04	4.96	140	
Land between Carlton Road and Cumwhinton Road – Carl 05	1.47	204	
Land at Garden Village, west of Wigton Road – Carl 06	5.05	139	
Land at Newhouse Farm, south-west of Orton Road – Carl 07	30.19	509	
Land north of Burgh Road – Carl 08	2.83	66	
Former Belah School site, Eden Street – Carl 09	2.34	59	
Land off Windsor Way – Carl 10	10.60	300	
Allocations carried forward from previous Local Plan			
Laings site, Dalston Road – Carl 11	2.56	90	
Harraby Green Road – Carl 12	1.05	45	
Durranhill Road – Carl 13	3.32	65	
Land at Carlton Clinic – Carl 14	4.19	100	
Total urban:		2 176	
Rural:	Area:	Yield:	
Brampton			
Land south of Carlisle Road – Bram 1	10.9	200	
Land west of Kingwater Close – Bram 2	2.31	65	
Land east of Gelt Rise – Bram 3	0.77	25	
Land north of Greenfield Lane – Bram 4	5.66	153	
Longtown			
Site of former Lochinvar School – Long 1	5.04	136	
Cummersdale			
Land east of Cummersdale Road – Cumm 1	0.38	14	

Cumwhinton		
Land west of How Croft – Cumw 1	0.76	25
Dalston		
Land at Buckabank – Dals 1	2.68	15
Linstock		
Linstock North – Lins 1	1.28	10
Rockcliffe		
Rockcliffe East	0.89	20
Scotby		
Land to the west of 37-65 Scotby Road	1.26	44
Warwick Bridge		
Warwick Bridge/Little Corby North – Warw 1	1.55	66
Wetheral		
Wetheral South – Weth 1	3.49	98
Wreay		
Land west of Wreay School – Wrea 1	1.16	10
Total rural:		881
Total district:		2 892

Development of allocated sites will have to be compliant with other relevant policies in the Local Plan.

The sites allocated under this policy are detailed as follows:

#### Carl 01 – Land to the south-east of junction 44

The site has been put forward for a housing allocation in the two previous Local Plans. At the last but one Local Plan Inquiry the Inspector concluded that, 'a decision on this proposal is finely balanced'. At the last Local Plan Inquiry the Council agreed that, 'access arrangement would be practical, it is above the functional flood plain, infrastructure is available, habitat potential is low, archaeological remains would require evaluation work and the site is deliverable', (paragraph 5.99 Inspector's report).

The Inspector concluded that the question of whether the site was allocated turned on whether there was sufficient land already allocated in the Plan to meet the housing requirement at the time. He also considered that following the adoption of the current Local Plan, the question of bringing forward sites in the northern part of the city would

be properly addressed through bringing forward a DPD for housing allocations as part of the planning system at that time i.e. the LDF process.

## Carl 02 – Site of Pennine Way Primary School

In order to fulfil plans to provide more primary school places in the City, Pennine Way Primary has been earmarked for an increase intake of pupils. This has necessitated its redevelopment and relocation onto an adjacent site. The school redevelopment is due to be completed in September 2014. This will leave a vacant brownfield site in a neighbourhood that benefits from a range of local facilities and services including public transport, neighbourhood shops, churches, open space and play areas.

### Carl 03 - Land south of Edgehill Road

The development of this site is linked to proposals for a community based facility on the adjacent former NCTC site. This will involve the rebuilding and expansion of the Pennine Way Primary School, and creation of a new Harraby Community Centre including a new community cafe, library link, multi purpose rooms, Sure Start facilities and creche and youth room.

This has resulted in the creation of a development site on the site of the current community centre and car park following the opening of the new facility in Sept 2014.

### Carl 04 – Land north of Moorside Drive/Valley Drive

This site was included in the previous adopted Local Plan as part of a larger allocation known at the time as Garlands, but now fully developed and known as Carlton Grange. However, at the time of the last Local Plan Inquiry, the Council highlighted to the Inspector a discrepancy between the Proposals Map and the written statement, with the policy referring to a smaller area of land than was shown on the Proposals Map. This site was therefore excluded from the last Local Plan – although the Inspector did not have any fundamental objections to its allocation (paragraph 5.113 of Inspector's report). The Inspector considered that this site could be reviewed through the planning process at that time i.e. the LDF process.

It has therefore now been put forward as a preferred allocation as it is considered to be well contained by existing housing areas, close to local amenities and facilities including primary schools, shops, playing fields and public transport.

#### Carl 05 - Land between Carlton Road and Cumwhinton Road

This site is proposed as a preferred option for a housing allocation as it is physically and visibly well connected to the existing built edge of Carlisle, and is well contained within mature hedgerows on its eastern and southern boundary. A minor road on the southern boundary of the site also forms an effective edge between the site and Carlton village to

the south. London Road has a frequent and regular bus service to the City Centre, and there are neighbourhood shops at both Petteril Bank Road and Central Avenue.

#### <u>Carl 06 – Land at Garden Village, west of Wigton Road</u> Carl 07 – Land at Newhouse Farm, south-west of Orton Road

These sites are both located on the edge of the urban area, within the urban area boundary for Carlisle. The land is level and not subject to any landscape or nature conservation designations. Some adjacent land is allocated in the current Local Plan for major mixed use development in the future comprising residential, employment and open space. Both the adjacent housing allocations have the benefit of planning permission and the site adjacent to Glaramara Drive is under construction.

The sites are therefore well positioned in relation to the south western expansion of the City. Their close proximity to the Carlisle Northern Development Route, local secondary school, public transport and local greenspaces increase their sustainability and accessibility.

#### Carl 08 - Land north of Burgh Road

This site lies opposite an established housing area. The Urban Area Boundary lies along the western edge of the site beyond which are the lines of five overhead power cables. To the east lies Burgh Road Industrial estate. The site slopes gently down towards the River Eden. It has frontage onto Burgh Road, and the boundary is marked by a mature hawthorn hedge.

The site is visibly and physically well related to the surrounding urban area in this part of Carlisle. It is also well located in terms of accessibility to the new western bypass, local primary school, open green spaces and public transport into Carlisle.

#### Carl 09 - Former Belah School site, Eden Street

This is a cleared brownfield site with good access to a range of local services, including public transport, and therefore in a sustainable location. The school use closed in July 2008 and the buildings were subsequently demolished. In November 2011 0.38 hectares of the site gained planning permission for a Primary Care Centre, pharmacy and associated car park.

The remainder of the site is considered suitable for housing development as it lies within an existing Primary Residential Area, has existing access onto the road network, is close to open spaces and other community facilities, and is deliverable.

## Carl 10- Land to the east of Windsor Way

This site lies opposite an area of established housing with potentially easily access routes into and out of the site. The site is a flat grazing land close to community facilities and is deliverable.

#### Rural Area

## Brampton - Bram - 01 Land south of Carlisle Road

This site lies on the western approach to Brampton, and forms a triangle of land with Carlisle Road to the north and another road to the east. Townfoot Industrial Estate lies to the north, and the site integrates well with the built form of the edge of Brampton in this area. It offers the potential to incorporate public open space within the site, together with extensive landscaping to soften the edge of the development. It lies within walking distance of the centre of Brampton, which has a good range of services and facilities. It is also close to a frequent and regular bus service and a secondary and primary school. There is a longstanding desire from the local community for a health centre at Brampton and this site is the preferred option for this facility.

### BRAM2 – Land west of Kingwater Close

This is a greenfield site that is very well related to the built form of Brampton. It is owned by the Council and can be considered surplus public sector land – the land is therefore immediately available. There are issues with access to the site, and it is likely that significant highway and junction improvements would be required should the site come forward for development, particularly off Elmfield where the existing access is too narrow to accommodate traffic. Alternative access may be achievable from Kingwater Close. Despite these access concerns the site is still considered to be sustainably located and deliverable.

#### BRAM3 - Land east of Gelt Rise

This is a small greenfield site that would relate well to the adjacent Gelt Rise housing estate. The site slopes gently up, away from the road, but this is not considered significant enough to render it unsuitable for housing development. Development here would have good access to Brampton town centre and public transport networks, the site is therefore considered to be sustainably located and deliverable.

#### BRAM4 – Land north of Greenfield Lane

A large greenfield site located on the northern edge of Brampton. The land is flat and well screened from the adjacent A6071 (Longtown Rd). Care should be taken by any applicant wishing to develop this site to ensure that screening is retained where possible and the landscape impact of development is kept to a minimum. The site has

no history of flooding issues and is sustainably located with good access to Brampton town centre and public transport networks.

## Longtown

## LONG1 – Site of former Lochinvar School

This is the site of the former Lochinvar Secondary School, which was closed after being declared surplus to requirements. The school buildings have been cleared and this mixed brown and greenfield site, which includes the school playing field, is now considered suitable for housing development. Care must be taken to ensure that an adequate supply of good quality, accessible playing fields exists within the town, should the playing field be lost as part of development.

## Cummersdale

## CUMM1 – Land east of Cummersdale Road

This small, greenfield site is located off Cummersdale Road, to the west of the village school. During consultation on the Strategic Housing Land Availability Assessment (SHLAA) this site received an overwhelmingly positive response from local residents. It was felt that its location would not contribute to increased traffic flow through the village and that its small scale would relate well to the existing settlement pattern. The land is generally flat and there are no known flooding issues, as such it is considered to be a deliverable and sustainable location.

## Cumwhinton

## CUMW1 - Land west of How Croft

This is a small, greenfield site that is well contained within existing landscape features. It would not have an overly prominent visual impact upon the village and is well related to the general settlement pattern. Access is achievable off the B6263, though some improvements may be required to ensure it is suitable for traffic. There are no known flooding issues on the land.

## Dalston

## DALS1 – Land at Buckabank

This is a greenfield site located in Buckabank, just south of Dalston. Development here would help to support services in Dalston. Buckabank is located close enough to Dalston to be considered a sustainable location, suitable for small scale housing development. Due to the rural nature of the village housing numbers on this site would need to be restricted to 15 units in order to limit the impact development would have

upon village character. Beyond this, the site is otherwise unconstrained and considered to be deliverable.

## Linstock

## LINS1 - Linstock North

This is a small greenfield site located in the village of Linstock, some 2 miles to the west of Carlisle. Linstock is connected to the city via a dedicated and direct cycle way/footpath. As such, it is considered to be a sustainable location with good access to services in the city. This allocation is generally flat, with no history of flooding. Housing numbers would need to be restricted to 10 units to ensure development does not have a significantly adverse impact upon the character of the village.

## Rockcliffe

## ROCK1 – Rockcliffe East

This greenfield site is located to the east of Rockcliffe Primary School. It is considered to be the most suitable and sustainable location for new development within the village. It is generally flat, does not suffer from any significant risk of flooding and would have reduced impact on the visual amenity of the village. Access from Lonning Foot is currently too narrow to accommodate a significant increase in traffic and it is likely that highway improvements along this road will be required as part of any development proposal.

## Scotby

## SCOT1 - Land west of 37-65 Scotby Road

This greenfield site is currently land locked. An application for development on this site would have demonstrate how and when access onto Scotby Road will be achieved. Access will likely require the demolition of an existing building. The site itself relates well to the settlement and provides a logical infill opportunity. It is otherwise generally flat and does not suffer from any significant risk of flooding and, as such, should be deliverable.

## Warwick Bridge

## WARW1 - Warwick Bridge/Little Corby North

This greenfield site relates very well to the existing settlement pattern of the village and provides a logical extension to Corby Hill. The land is flat and does not suffer from any significant risk of flooding. There are known highway capacity issues in and around the

Little Corby Road/A69 junction, which will need to be addressed as part of any new development proposal.

## Wetheral

## WETH1 - Wetheral South

This greenfield site lies on the southern edge of Wetheral, adjacent to Wheatsheaf Gardens to the north and the village playing fields to the south. The land is flat and does not suffer from any significant risk of flooding. It is also well related to the existing settlement pattern of Wetheral. Wetheral is well serviced by public transport and there are a number of community services, including a school, located within the village itself. As such the site is considered to be sustainably located and deliverable.

### Wreay

### WREA1 – Land west of Wreay School

This small greenfield site is located adjacent to Wreay School. In the previous Local Plan Wreay was not included as a suitable location for new development; however given that the village benefits from a number of services including a school, pub and village hall, and that it has seen little new development over the last 5-10 years to support these services, it can no longer be justified to exclude Wreay from the list of suitable and sustainable locations for new development.

The site is flat and does not suffer from any significant risk of flooding. Housing numbers would need to be restricted to 10 units to ensure that new development does not have an adverse impact upon the amenity of the village.

#### **Alternative Option allocated sites**

The allocated sites for years 6 - 10 in the Plan period have been selected as they are considered to be the best option in terms of suitability, achievability and availability, i.e. they are deliverable. Through this consultation we would encourage comments on the location of these sites, and any alternative sites that you consider would be more suitable.

In particular we would also welcome comments on the yield for each allocated site.

#### Broad location for growth 2026 -2030

For years 11 - 15 the preferred option is for the Local Plan to identify a broad location for growth in the area of Carlisle South, as identified on the Local Plan policies map. The justification for this preferred approach is set out below.

#### Population growth

The Carlisle HNDS shows that Carlisle's population has been growing at a faster rate than the County or the Region, growing by 3.5% between 1999 – 2009. The City is a key centre for services and employment in Cumbria, has above average jobs density and strong labour market self containment. The City's role will therefore continue to be as a centre for housing, employment and services for a wide hinterland.

It is therefore expected that population and demographic dynamics as well as employment growth will drive demand for housing over the longer term to 2030.

The Strategic Housing Land Availability Assessment as of March 2012 shows housing potential for approximately 8212 houses over the next 15 years which averages 533 houses/year. This is subject to change as more sites come forward.

#### National Policy

The NPPF states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development. (NPPF para.52).

#### Summary of benefits of approach

The benefits of delivering a large scale urban extension can be summarised as follows:

- opportunity to comprehensively shape the physical form and social fabric of an area to create a sustainable place in an area-based as opposed to piecemeal approach;
- meet housing shortage and provide range of types and tenures to meet need and demand;
- help realise economic potential of an area and create new jobs;
- provide strategic public transport provision and highways network to support the development and the wider area;
- effective way of capturing uplift in land value and funding infrastructure;
- create comprehensively planned and owned green infrastructure;
- maximise low carbon living and effective use of resources
- secure better community engagement, governance, stewardship and ownership.

#### Environmental sustainability

Environmental sustainability can be delivered by less dense and greener urban development, even if this means developing on green fields as part of an urban extension. This can bring increased opportunity to create quality urban greening and better places to live, which will contribute to the climate change, health and biodiversity agenda. Attractive green areas created as part of a strategic urban extension can encourage active behaviour, and trees and other vegetation can help to reduce carbon dioxide and particulates.

#### **Biodiversity**

Opposition to the development of greenfield sites, especially one on this scale, is often based on the loss of biodiversity. However, biodiversity is frequently higher in urban areas than in green fields. This is largely due to farmland being intensively managed resulting in a very little diversity of species and habitat. However, urban habitats tend to be of a larger variety – residential gardens, allotments, parks, verges, railway land, community gardens.

A strategic site has the potential to integrate biodiversity into the overall layout of open spaces and wildlife corridors.

### Better design opportunities

Prior to the NPPF, national policy was to pursue a 'brownfield first' approach. Within Carlisle district a target of % development on brownfield sites was achieved between \*\*\* Whilst this brought many benefits, including regeneration of vacant and previously used land, the classification of gardens as brownfield and the drive for higher densities resulted in town cramming and a reduction in urban green space. In addition, some new development did not respect the character of the neighbourhood in which it was located.

The recent focus on building flats in the city, whilst bringing redundant buildings back into use, does not provide versatile enough accommodation to adapt to changing households, especially growing families, or provide people with gardens.

#### Infrastructure needs

The allocation of this site is required to deliver infrastructure which is central to the delivery of the Local Plan and its objectives.

There are critical capacity issues within Carlisle for the highways network, the waste water network and the provision of primary and secondary education. In relation to the highways network, there are significant road capacity issues for Carlisle both within the road network and at motorway junctions. A strategic allocation can deliver an

accessible environment with integrated transport being planned from the outset of the development.

The NPPF states that planning policies for large scale residential developments should promote a mix of uses in order to provide opportunities to undertake day to day activities including work on site. In addition key facilities such as primary schools and local shops should be located within walking distance of most properties.

The utilities network for waste water within the City of Carlisle is also limited in capacity and will require upgrading to facilitate sporadic new development. This can lead to disruption to the public. A strategic allocation can provide an integrated water network for both clean and waste water, and a dedicated sewerage treatment works.

United Utilities preferred approach is to see a brand new supply line brought into the city, as would be triggered by a large development focused in a single area, such as the proposals for south Carlisle. This would be more preferable to attempting to upgrade existing pipelines to accommodate smaller developments scattered across the edges of the city.

#### **Education**

One of the biggest challenges to planning for infrastructure relates to education provision. The policy landscape for schools is changing with the Academy Programme and the Free School Programme having the potential to change how new school places are funded in the future. Currently all of the primary schools within Carlisle are at capacity. Whilst there is limited capacity within secondary schools, they will also be full by 2020.

The NPPF states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are encouraged to take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. In particular, great weight should be given to the need to create, expand or alter schools.

A strategic allocation will enable the building of new primary schools, and a new secondary school, with associated playing fields.

#### Alternative options for meeting required level of growth in the district.

The alternative approach to a strategic allocation is to have sporadic development within and on the edge of the city, as no other strategic sites were submitted as part of the SHLAA process.

This alternative option of spreading the development around the City on smaller sites was supported by the majority of respondents to the earlier Issues and Options

Consultation. However, this option has been rejected due to the difficulties of providing for the required levels of infrastructure, which could have adverse environmental, economic and social implications.

It is considered that smaller allocations would not have the critical mass to provide the necessary community and educational infrastructure on site. Financial contributions towards off-site provision from smaller sites spread around the City are considered unlikely to provide a timely sustainable alternative to on site-provision.

The cumulative impact of sporadic growth is also likely to be greater than that of a comprehensively planned single large development. In particular there would be considerable localised impacts on the highways network in parts of the City which are currently at capacity.

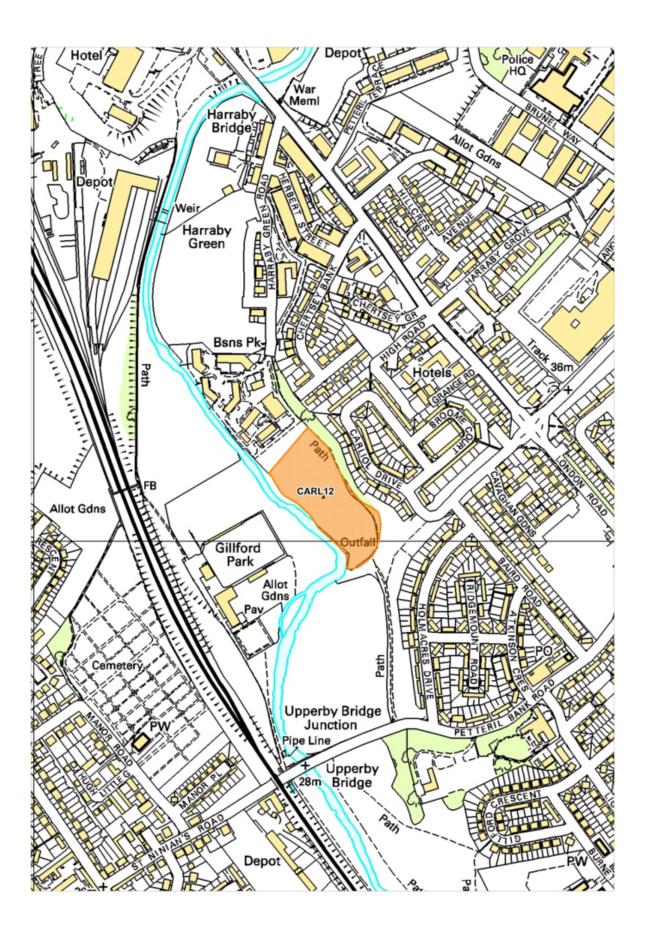
In terms of green spaces, any housing development will generate additional demand for public open space and bring additional pressure on existing city parks and open spaces. It is unlikely that smaller housing developments would be able to provide anything other than local open space to meet the demand generated by the new development.

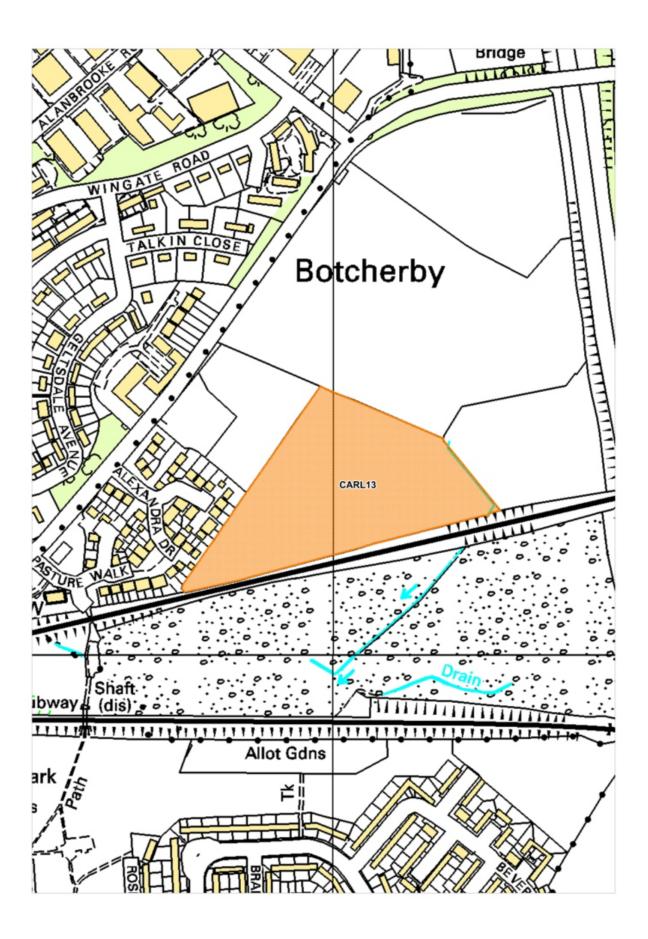
Furthermore, a dispersal strategy leading to a large number of development sites spread around the edges of the City, required to meet the annual housing target, is also likely to have significant landscape and other environmental impacts.

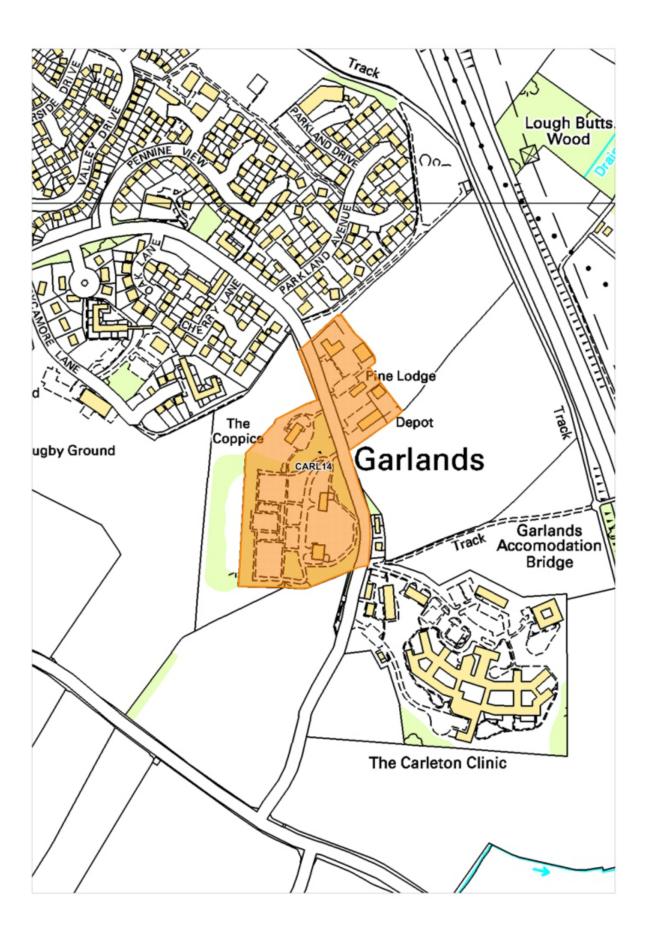
In conclusion, the scale of the strategic allocation is determined by the need to achieve the critical mass to meet the main infrastructure needs, especially in respect of primary school facilities, for which there is currently an acute shortage of places in the town, and secondary education provision, which will be at capacity by 2020.

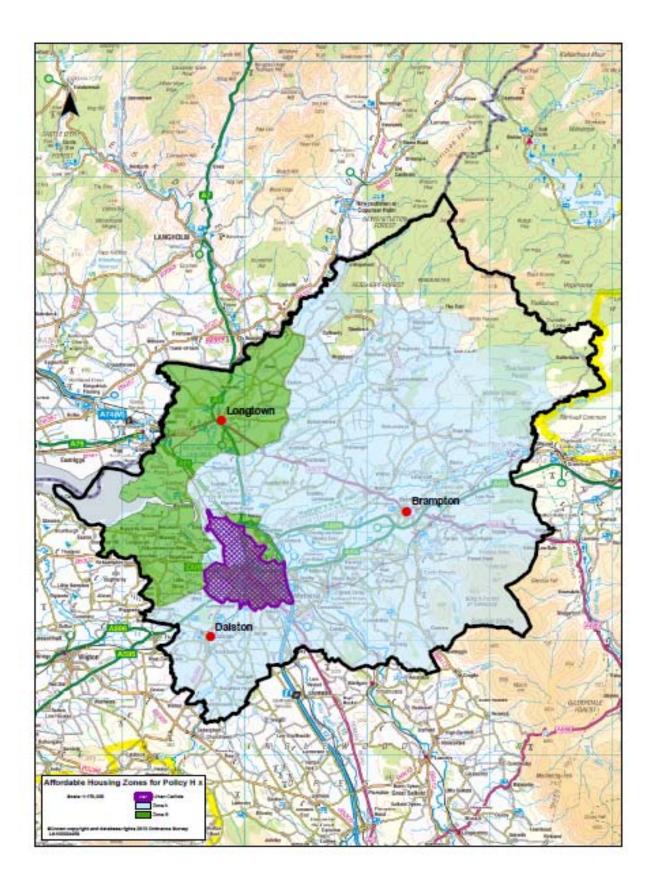
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Existing housing allocations carried forward from adopted Local Plan 2001 – 2016









## Policy S2 - Spatial Strategy

### Consultation so far/What you told us:

During consultation on the Core Strategy Issues and Options consultees were invited to comment on various approaches to the spatial distribution of growth across the district. The majority of responses felt that the development plan should look beyond its 15 year plan period and set a long term direction for growth that would exceed the lifetime of the plan.

Over the course of the plan's lifetime, opinion was evenly split regarding the location and character of growth with 24 responses believing that growth should be focussed within the existing built extent of Carlisle's urban area and a further 24 wanting development to extend to make use of the new highway improvements brought about by the opening of the Carlisle Northern Development Route (CNDR).

A number of key messages received during consultation included:

- Growth should take account of sustainable transport options to ensure that walking, cycling and the use of public transport is always the easiest option for people and thus reduce reliance on the private car
- Growth must not neglect rural areas the smaller settlements in the district should be allowed to grow, not just the city, to ensure that local services can remain viable.
- There should be a focus on the south of the city, particularly to find ways to alleviate problems with traffic driving through Dalston and rural roads to access Junction 42 of the M6.
- The city centre should be protected and allowed to grow sustainably

There was also recognition of the current imbalance between employment areas in the north of the city and residential areas in the south. Most responses called for a focus on the south of the city to improve transport links and the employment offer around J42 of the M6; however a number also called to channel growth into the north to support the industrial estates at Kingstown and Kingmoor. Other responses were keen to utilise the new corridors opened up by CNDR, though, to counter this, a number of responses warned about developing along new road links, as this could lead to an unsustainable pattern of development that moves people away from more central and better connected areas.

## Policy S2 – Spatial Strategy

When considering development proposals across the City, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council will work proactively to find solutions which mean proposals that accord with planning policies can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area.

Carlisle City Council will support the delivery of new housing, economic growth and diversification through the strategy:-

- Deliver at least 9000 dwellings over the next 15 years, 70% will be located in the urban area of Carlisle, and 30% in the rural area which averages 600 houses/year. Sites have been allocated for years 6 – 10 in the Plan period. For years 11 – 15 the preferred option is to identify a broad location for growth in the area of Carlisle South;
- Strengthen and protect the city centre and other existing centres to help create sustainable centres where adequate services and facilities would be provided by balanced growth;
- Develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor, and an employment facility at the Harker Industrial Estate that requires a major electricity supply due to its proximity to Harker substation;
- Strengthen the City as a focus of high educational achievement with facilities that support future economic growth;
- Develop employment land at Kingmoor Park (including Brunthill), and south west of Morton, whilst also improving the overall qualitative offer of employment land within Carlisle.
- Maintaining and enhancing the importance of environmental, heritage and landscape assets;
- Make the use of public transport, walking and cycling easy, to reduce nonessential car use;
- Address the impact on climate change, renewable energy, air quality, green infrastructure, recycling/waste, flooding issues and the water environment.
- Contribute to individual and community wellbeing, health and safety and social inclusivity;
- Achieve high standards of design and sensitivity to character, setting and cultural heritage;

#### **Justification**

In taking the Local Plan forward the Council recognises the importance of the Spatial Strategy closely matching the main objectives of the corporate "Carlisle Plan", which sets out key priorities for the City Council (2013-16).

The Local Plan will enable the delivery of key elements of the vision within the Carlisle Plan, in particular:

- support the growth of more high quality and sustainable business and employment opportunities;
- address Carlisle's current and future housing needs;
- develop vibrant sports, arts and cultural facilities.

The Carlisle Housing Needs and Demands Study (HNDS), 2011, shows that Carlisle's population has been growing at a faster rate than the County or the Region, growing by 3.5% between 1999 – 2009. To deliver the strategy, the Plan focuses housing delivery on the City of Carlisle, whilst also allowing a proportion of housing to come forward in the rural areas. The Plan aims to aims to achieve this through allocating specific sites for housing across the district, and setting out a policy based approach for housing on non-allocated sites. The Local Plan housing strategy aims to meet the housing needs for the District for both open market, affordable and special needs housing. It does this with reference to the evidence set out in the HNDS on current and future demographic trends, market trends and the needs of different groups in the community.

The Carlisle Employments Sites Study along with work on the Local Economic Assessment and Economic Potential indentify the strengths of the local economy along with indicators of where improvements are required to sustain economic growth. One of the key issues has been the quality and choice of employment locations for companies to invest. The strategy sets out the key areas to address the longer term needs and ensure that appropriate sites are brought forward to strengthen the local economy as well as providing for investment and redevelopment for existing businesses.

The Carlisle retail Study 2012 found that there was limited spare capacity in the initial years of the plan period and therefore any development should aim to reinforce the city centre as the prime retail location. This is in accordance with section 2 of the NPPF to ensure that the vitality of town centres remains. For Carlisle this means that the city centre should remain the main focus of retail development.

Carlisle's heritage is central to its attractiveness as a tourist location with Hadrian's Wall Path crossing the District. The City Council recognises the value of its heritage assets and their importance in giving the area a strong, distinctive identity and real sense of place. Tourism, arts and cultural development is of major importance to Carlisle as a generator of economic prosperity and employment. It is essential that the tourism potential of the District is promoted and exploited to maximise the benefits it can bring to the area.

Carlisle City Council recognises the importance of protecting our environment and using the natural resources available to us to their fullest through renewable energy generation and energy efficient design and materials. Central to this is ensuring that the District is resilient to the effects of climate change through ensuring that new development is directed away from areas at risk of flooding and that new development manages its potential effects responsibly. Carlisle Green Infrastructure Strategy: The Big Green City, which recognises the fundamental role green infrastructure and the natural environment play in creating an identity for the district and for Carlisle as a green city. Biodiversity, landscape and green spaces are to be protected, ultimately for the sake of their own natural value, but also for the well being and good health of the district's citizens and visitors.

## Policy S5 – Regeneration and Strategic Retail in the City Centre and Botchergate

Carlisle City Centre will be the principal focus for high quality comparison retail, supported by a range of leisure, tourism, heritage and other main town centre uses. In particular there will be opportunities for future development between the railway station and the pedestrianised area of the City Centre.

Proposals for development should be able to demonstrate:

- enhancements to the public realm;
- preservation and enhancement of the character, appearance and wider setting of the City Centre, and Portland Square/Chatsworth Square Conservation Areas;
- potential for use of upper floors as residential.
- delivery of the City Centre Masterplan

Within Botchergate, proposals which focus on the consolidation and improvement of the leisure and retail uses, or can demonstrate diversification into other uses such as office, residential, cultural and other services will be acceptable, subject to meeting the above criteria.

This policy has the aim of proactively planning for the enhancement of Carlisle as a vital and vibrant city centre destination for both retail and leisure.

Carlisle is a sub-regional centre serving a large hinterland with little competition from other sub-regional or regional centres. It is located in relative geographical isolation, and has relatively high levels of expenditure retention.

The Carlisle Retail Study 2012 shows that there is no immediate need to allocate a site for new comparison provision in the City Centre in the early phase of the Local Plan, up to 2018. However, whilst there is relatively limited short term quantitative need, there is substantial quantitative need in both the City Centre, and on a City wide basis, in the latter phases of the Local Plan. This growth in need is mainly due to projected population and expenditure growth.

It is recognised that a 'do nothing' scenario would lead to a relative decline in the overall competitiveness of the City Centre. In response to this a City Centre Masterplan is being prepared which will identify where the retail need can be accommodated, whether any uses can be relocated, and if necessary, where else retail uses can be accommodated. The Masterplan will also look at current constraints such as lack of

available modern floorspace, retailers in constrained units, and unsatisfied retail requirements etc.

The Masterplan may identify suitable sites to accommodate new substantial retail development within the City Centre.

## **Employment Allocations**

## **Policy 1 – Employment and Commercial Growth Land Allocations**

Undeveloped land at Kingmoor Park (including Brunthill), (30 ha) and land to the south west of Morton (8 ha) is allocated for the development of B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution).

Develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor

Land is allocated at the Harker Industrial Estate for employment development that would require a major electricity supply due to its proximity to Harker substation.

In the rural area, within the boundary of Carlisle Airport, development that is related to airport activities will be acceptable. In addition, enabling employment development that would facilitate the further operational development of the airport will be acceptable. In the case of the latter, applicants will have to provide evidence of how their proposals will facilitate retention and/or expansion of aviation related activities.

## Justification

The current adopted Local Plan identifies three employment allocations to meet the differing needs and demands of a range of employment sectors. One of these sites, land south of Park Road at Durranhill, was allocated in response to the need for a premier pedigree livestock centre. However, this is no longer an identified need, and therefore the site has been deleted.

The Carlisle Employment Land Study identified that whilst there was sufficient land for employment in Carlisle there were qualitative issues with the sites which were available for employment uses. In addition there were also issues with limited opportunities given the dominance of key parties in the property market for employment sites.

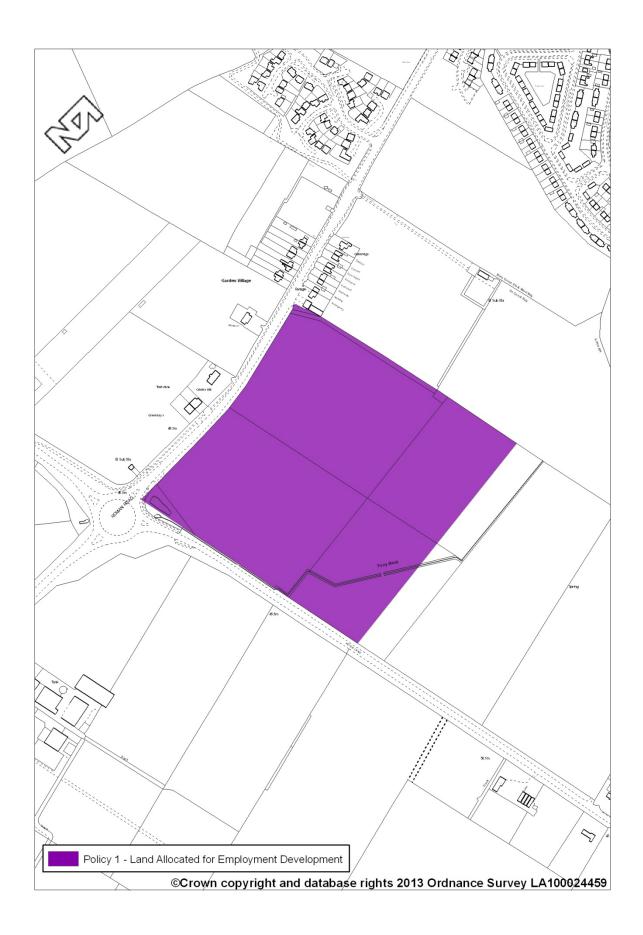
The study recognised that in order to address these concerns there was potential to improve the employment sites offer in Carlisle but this needed to react to special circumstances rather than continue with generic B class uses.

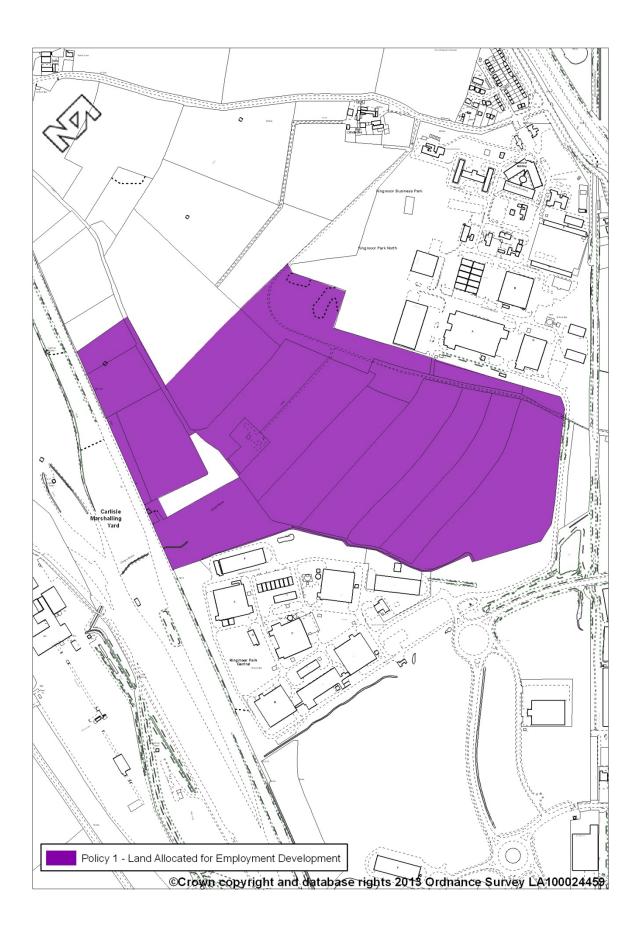
The study saw little potential to expand outside the M6 corridor although it did not consider the full context of future growth which this local plan seeks to achieve. The Local Plan has a commitment to ensuring opportunities for maximising the economic potential of the M6 corridor.

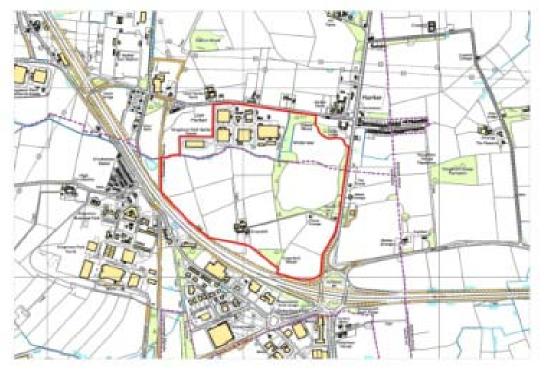
It is recognised that specific economic needs may not be met by existing employment allocations, for example developments in storage of information and data requirements such as data centres. Such uses have specific requirements including close access to a power supply. In order to provide adequate land for such uses a new site is allocated to the north near to the power supply at Harker Sub Station. However, any use would have to minimize any increase in traffic levels due to the capacity of the existing highway network and Junction 44 of the M6.

Within the rural area, the Council has a continuing requirement to support the development of the airport for aviation and associated business uses. It is considered that merging Policy S6 within this policy is considered more appropriate as they are related issues and provide a clear rationale to support sustainable economic development in the Local Plan. The NPPF states that when planning for airports, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. The location of the airport in open countryside between Carlisle and Brampton would make it unlikely that development that would generate significant traffic movement would be acceptable. Such developments should be located where the need to travel would be minimised and the use of sustainable transport nodes maximised.

Enabling development, i.e. development that would facilitate further development that is essential or conducive to the efficient operation of the airport, will be acceptable, provided that the scale of such development is appropriate to the operation of the airport and the surrounding environment.







Land at Harker, north of Junction 44 of the M6

#### Retail development

#### **Policy 9 – Morton District Centre**

Land is allocated at Morton for a District Centre to accommodate a foodstore with a capacity of 8 175sq m gross.

Any other foodstore applications elsewhere in the City will be required to demonstrate that they would not undermine the planned delivery of the Morton scheme, or impact on its trading viability, or impact on the viability of other committed or operational foodstores in the City.

#### **Justification**

The Carlisle Retail Study August 2012 recommends that the District Centre allocation for Morton should be retained though the emerging Local Plan in order to provide sufficient policy protection to ensure that the foodstore anchor is delivered.

However, it is recognised that there is potential to introduce a wider range of comparison retail and service uses as part of the Morton District Centre to meet the wider needs of existing and future residents.

A capacity assessment of current foodstore commitments across the City shows that there is no requirement for new convenience provision in the City over the emerging Local Plan period through to 2030. This position will be monitored when committed foodstore schemes are trading, and regular main food shopping patterns established.





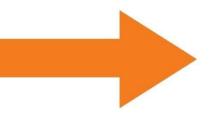
# Local Plan Housing Allocations

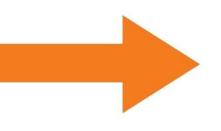


Preferred Allocation:	Site recommended to be allocated for housing
Committed Approval:	Approved development. May currently be under construction
Application Awaiting Decision:	Major housing application that has yet to be decided. Unable to allocate, as this could prejudge the planning application
Alternative Option:	Other suitable and available site that has been considered but not recommended for housing allocation
New SHLAA site 2013:	Site that has come through the Strategic Housing Land Availability Assessment (SHLAA) since November 2012. Not fully assessed yet in terms of suitability, therefore not appropriate to allocate at this stage.
Brampton Medical Centre:	Proposed Medical Centre in Brampton, currently in early discussions.



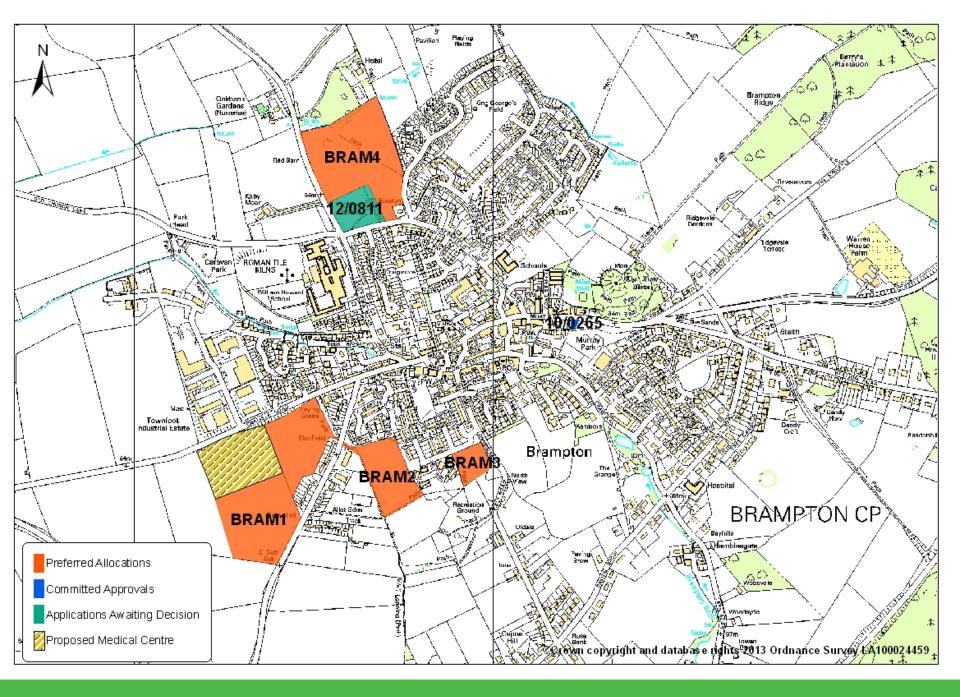
## **Rural Area**

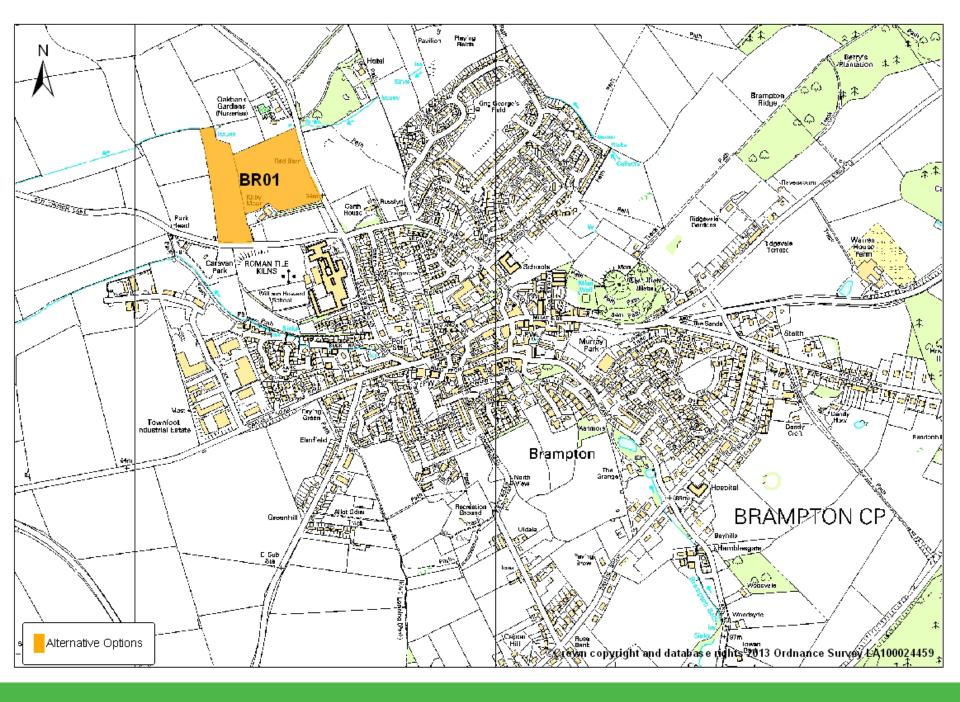


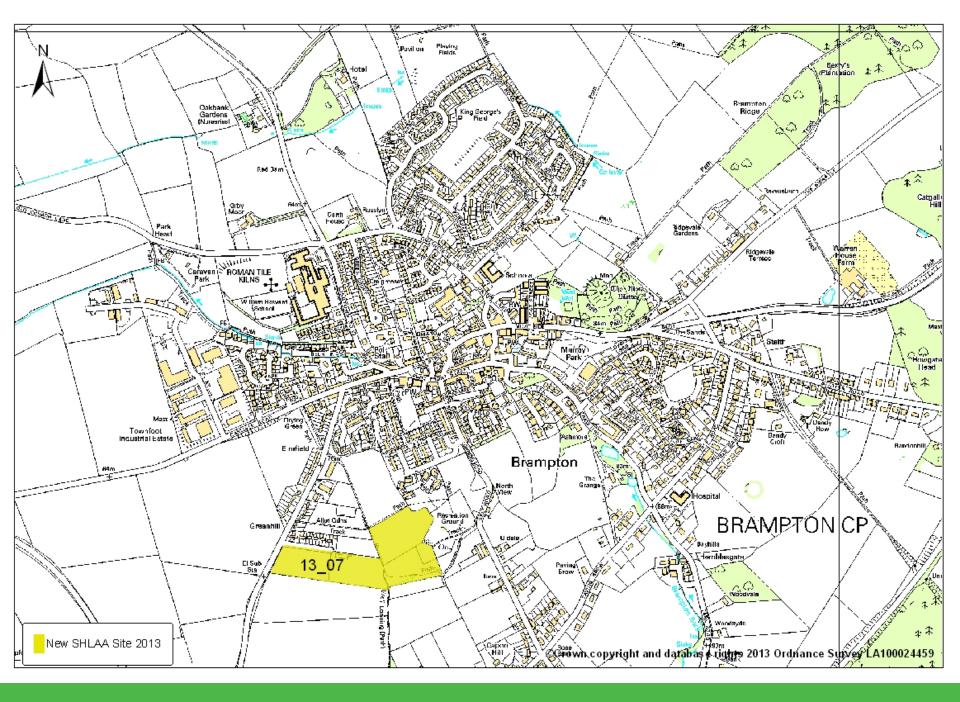


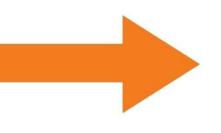
## Brampton





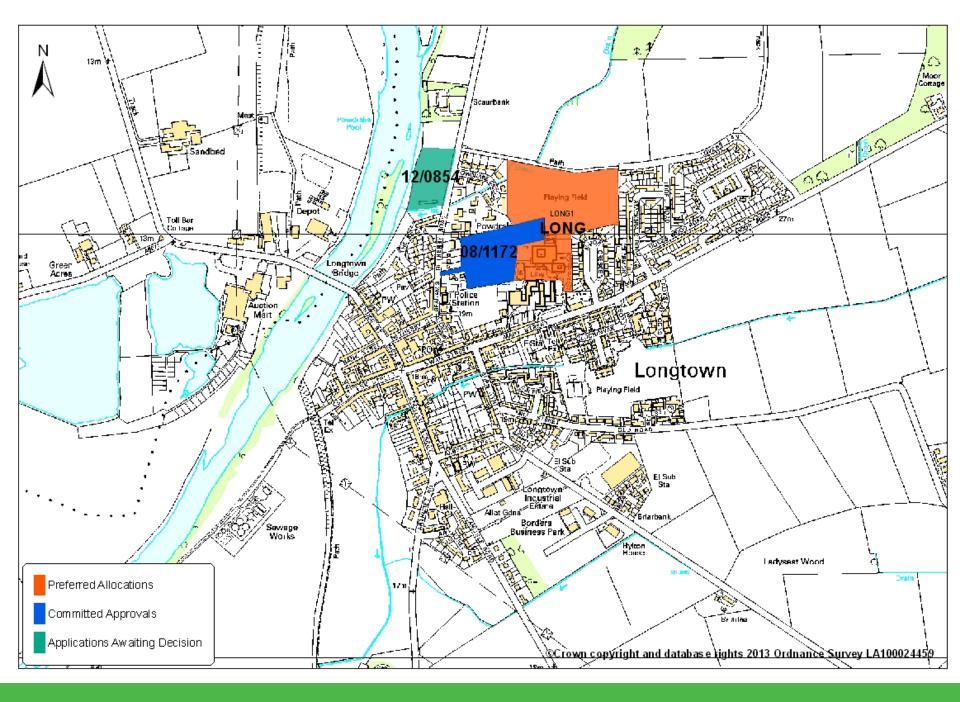


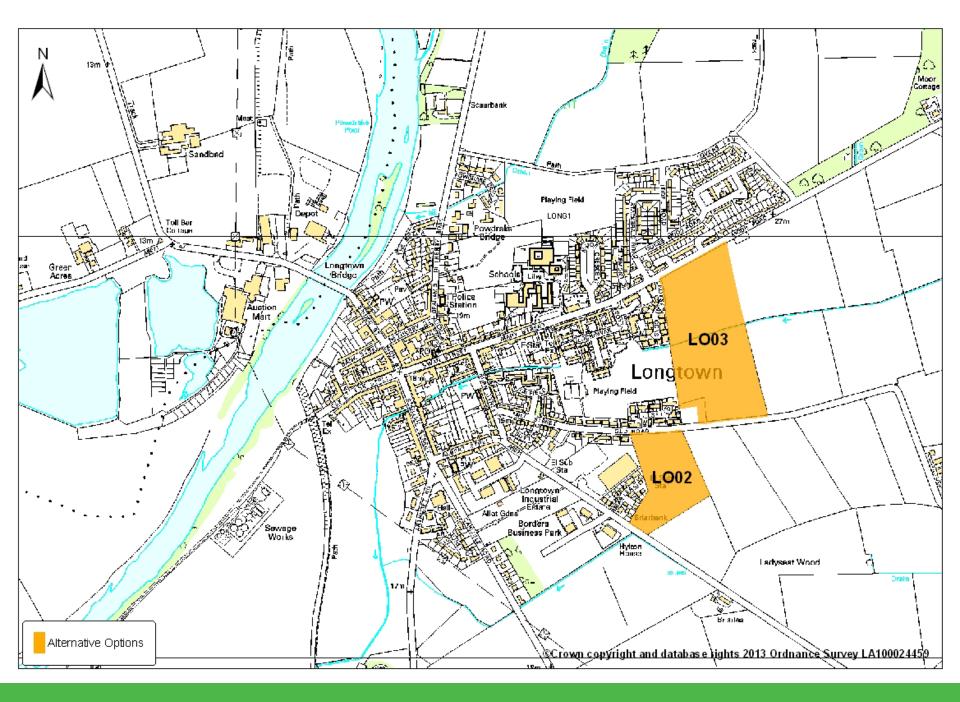


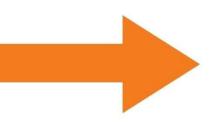


## Longtown



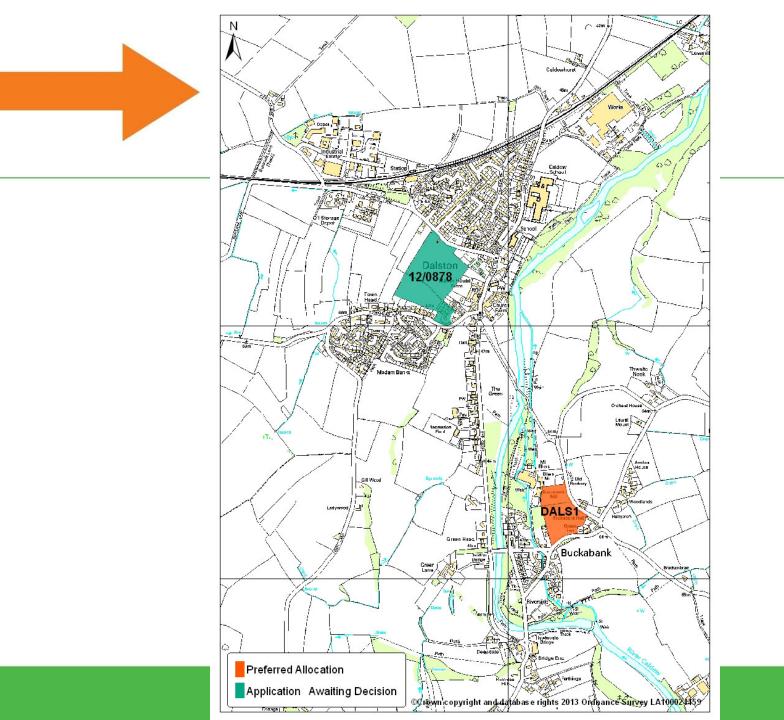




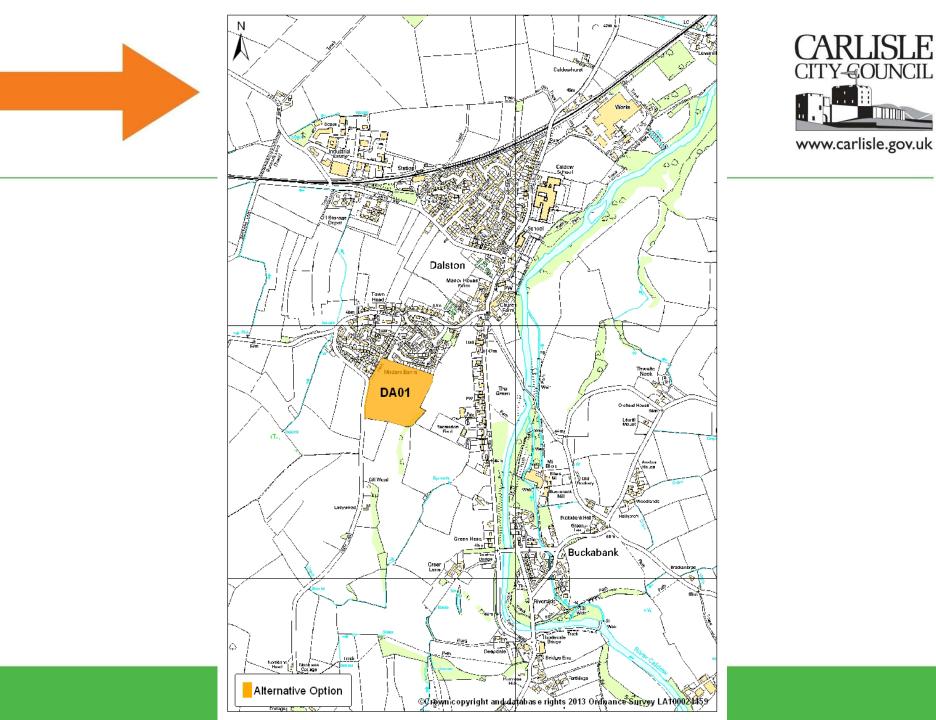


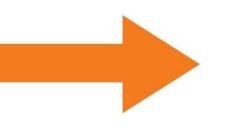
#### Dalston





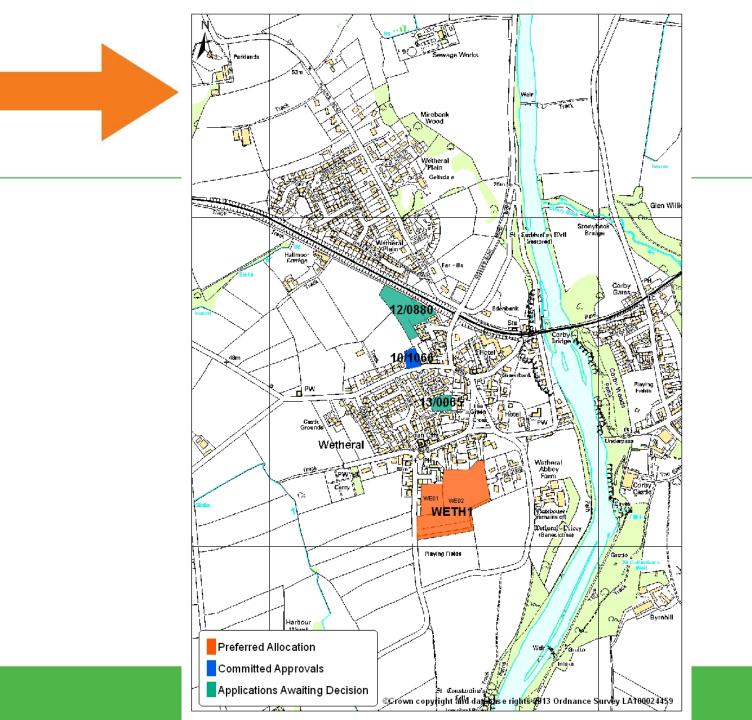




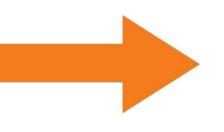


#### Wetheral





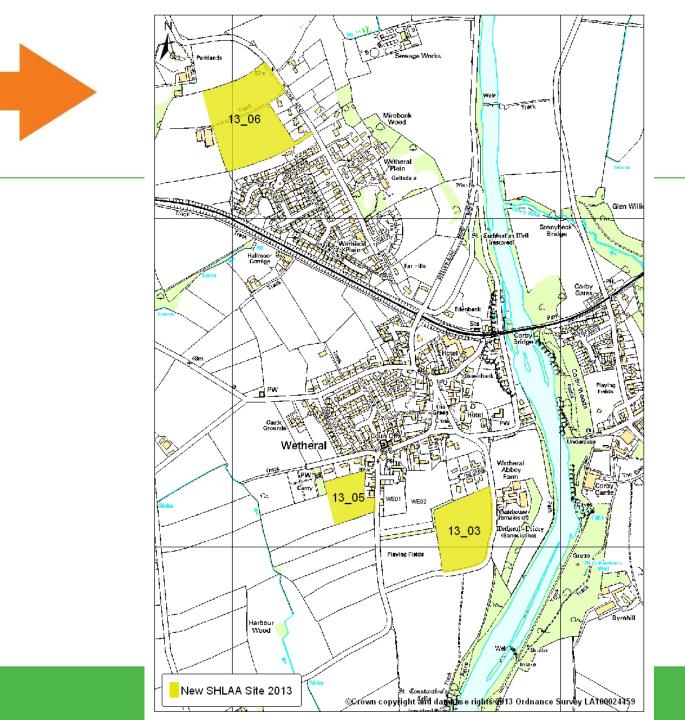




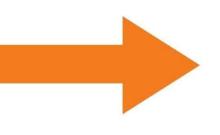




# There were no alternative options to consider in Wetheral

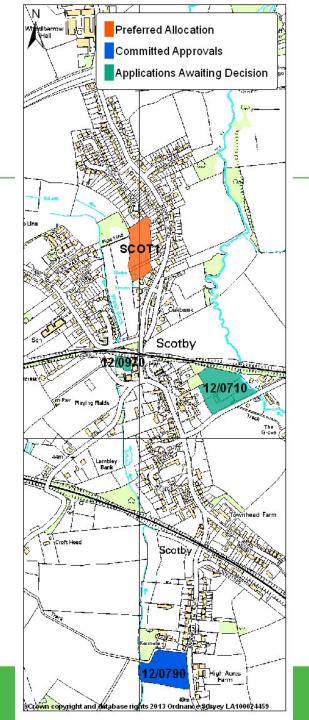




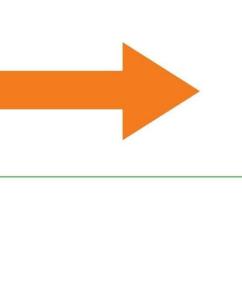


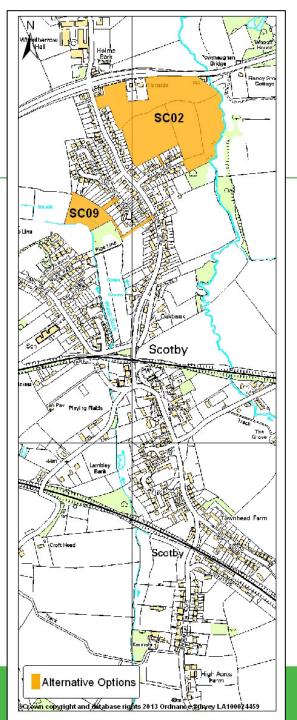




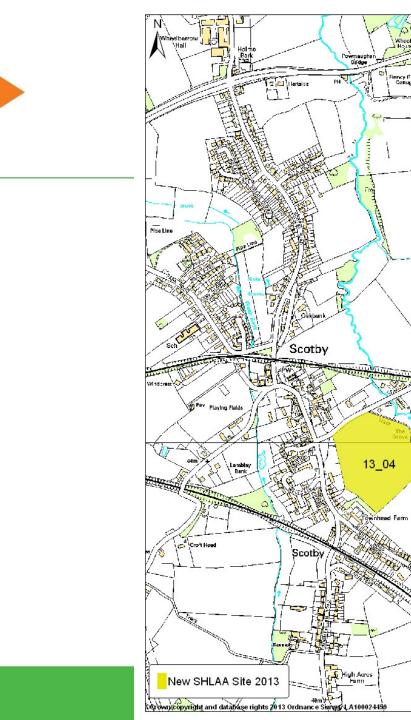












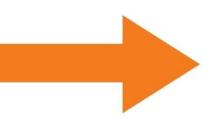


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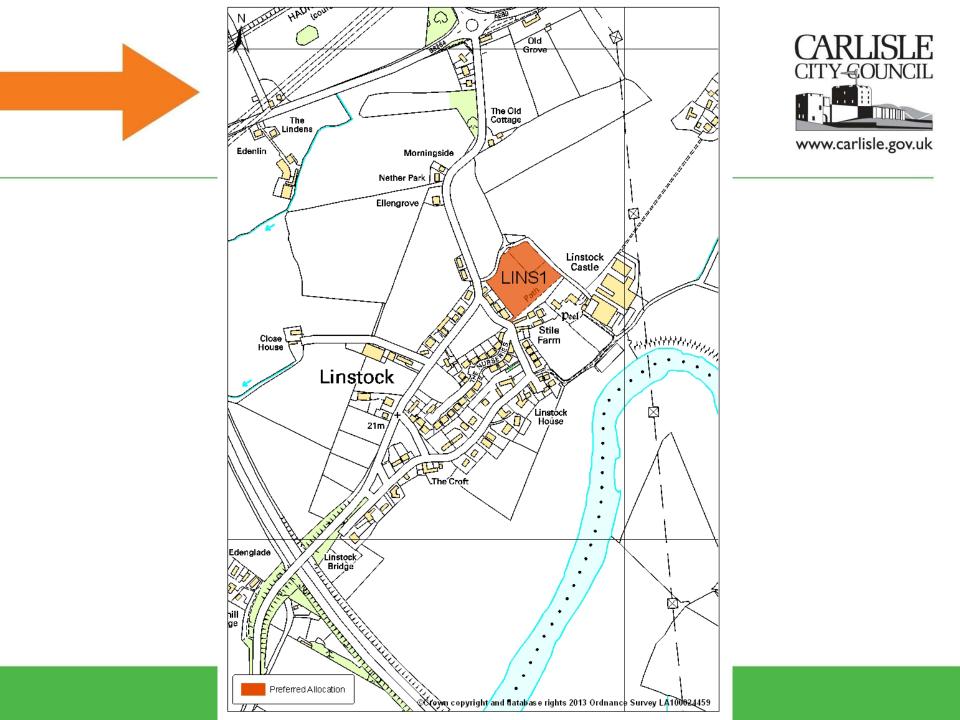
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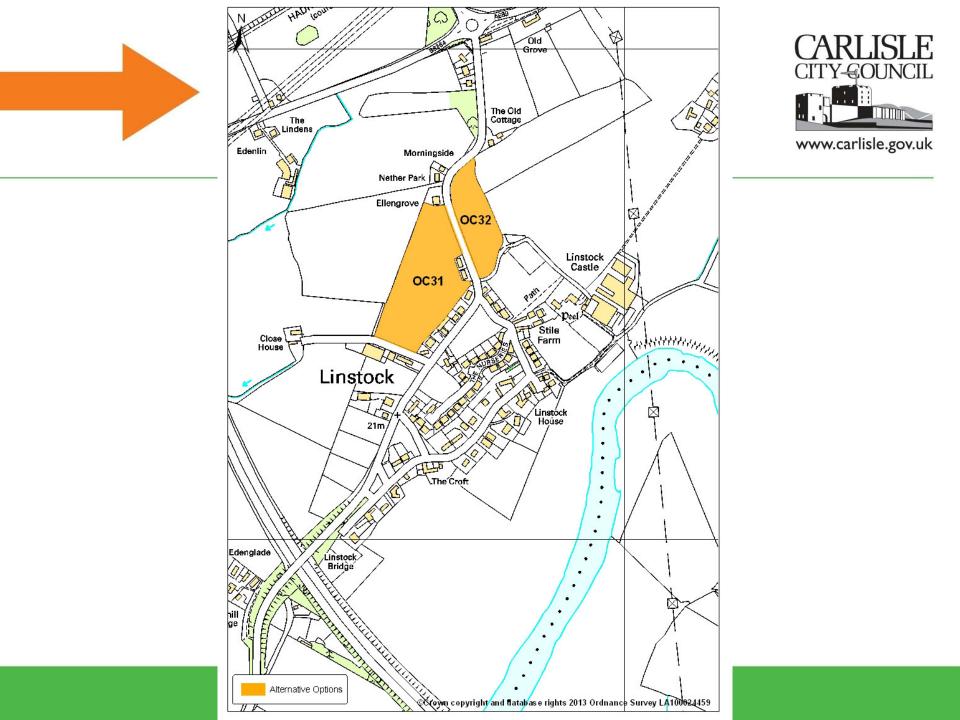
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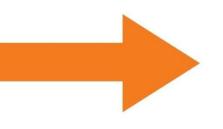


#### Linstock



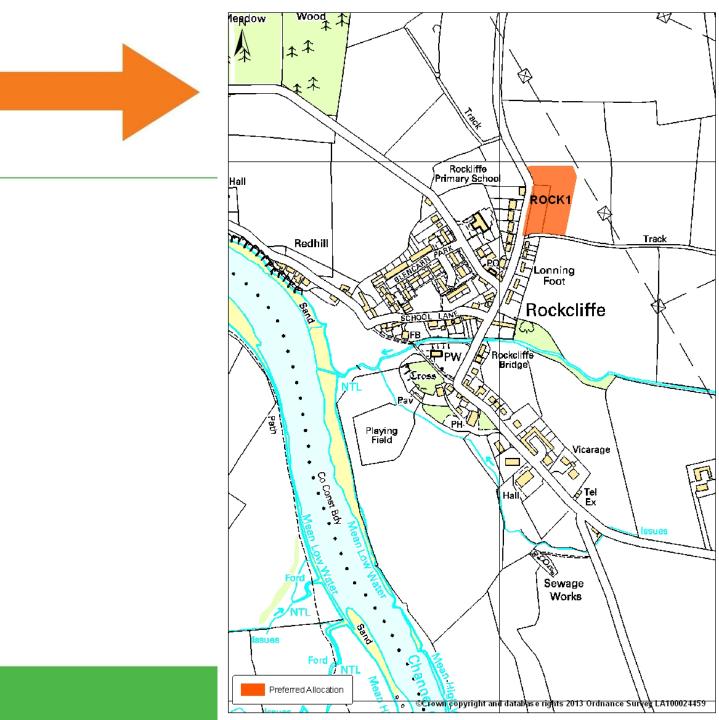




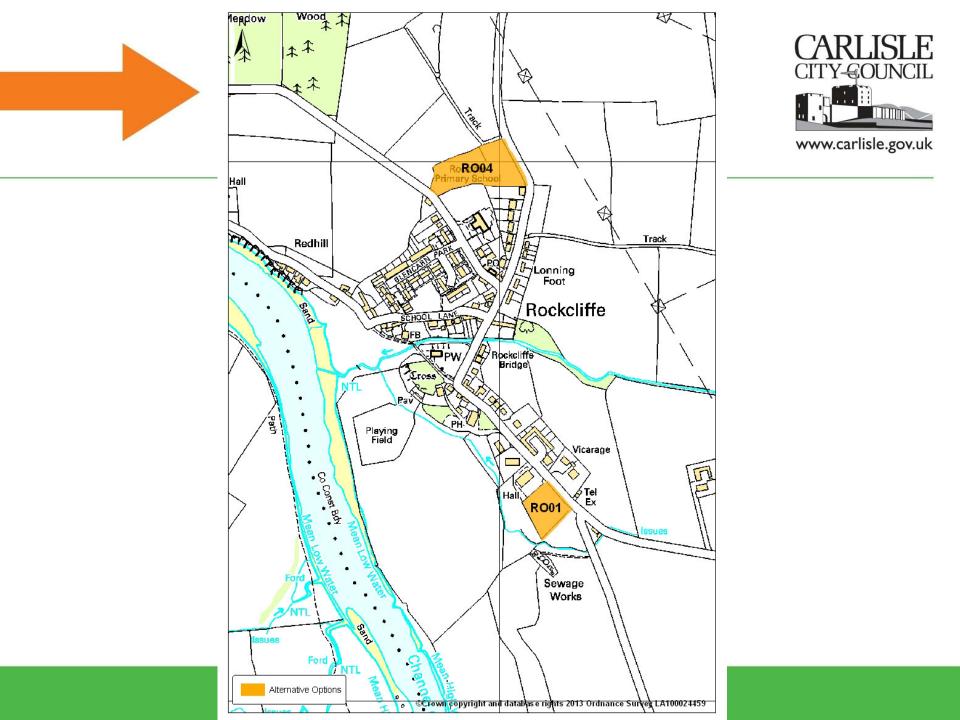


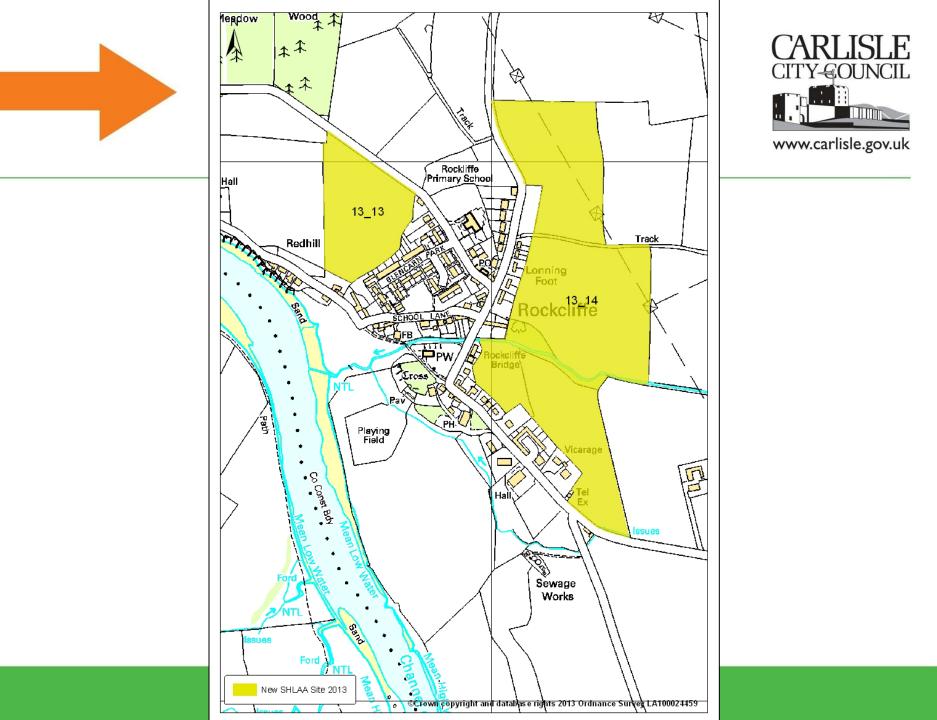
#### Rockcliffe

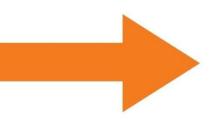






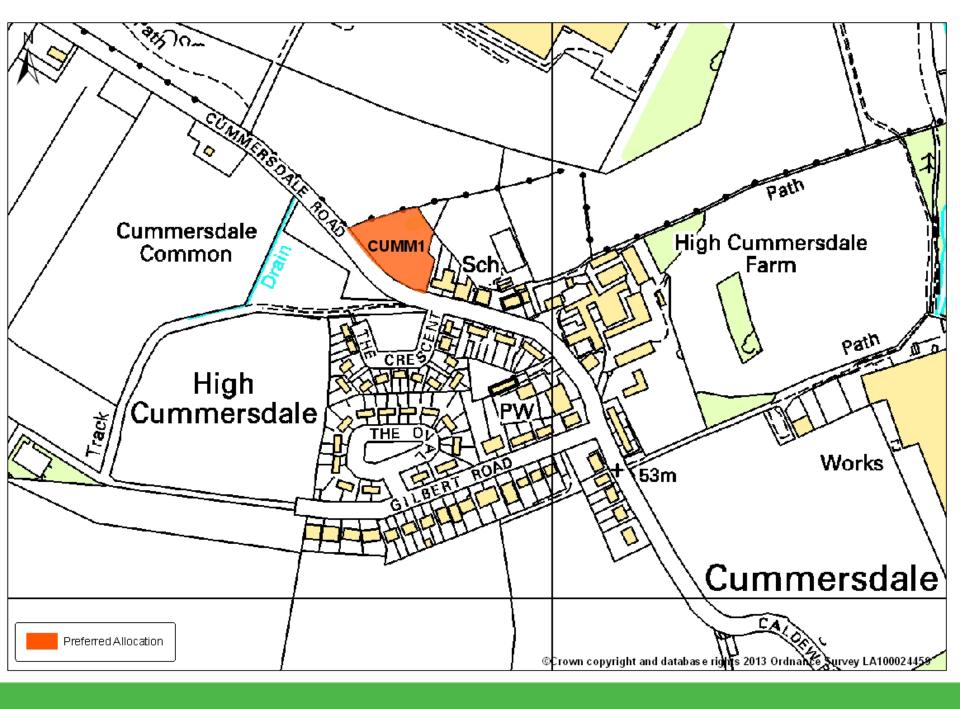


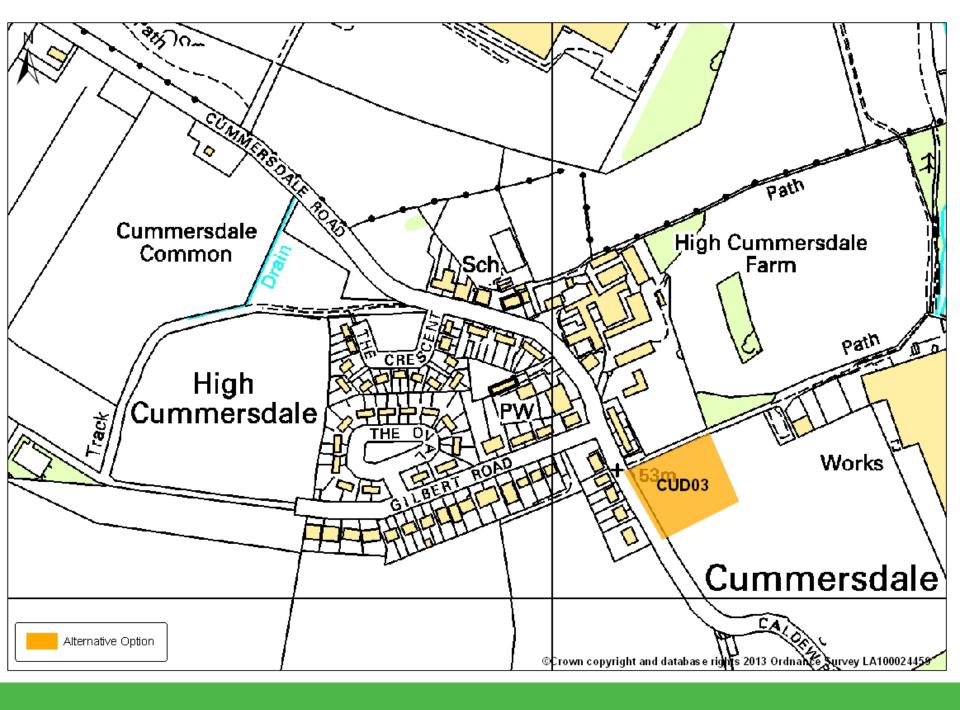


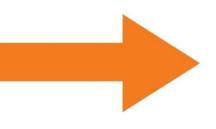


#### Cummersdale



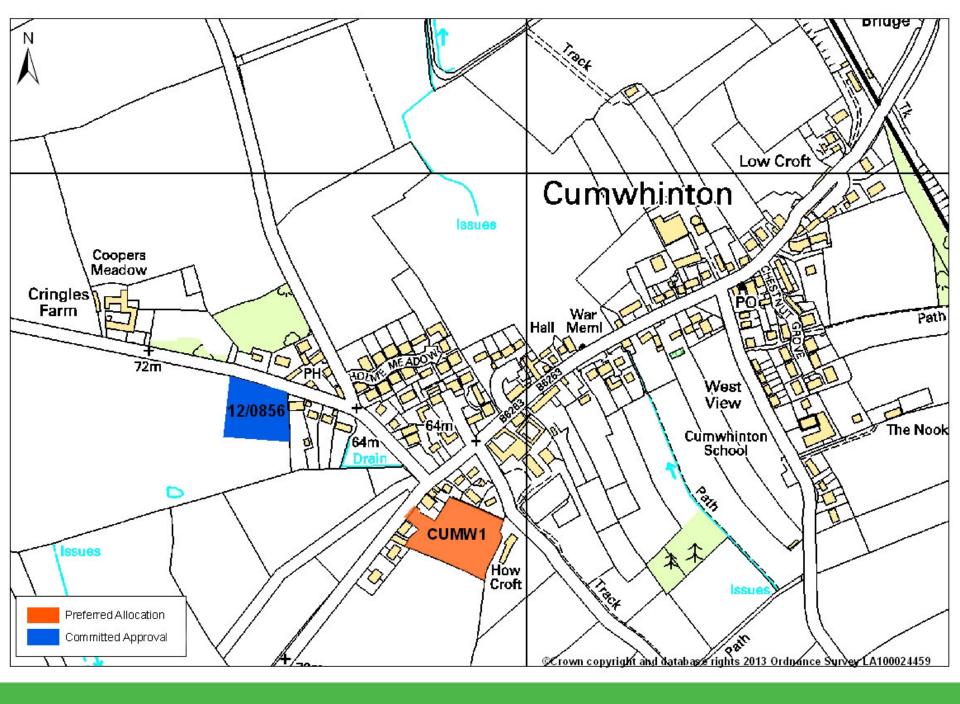


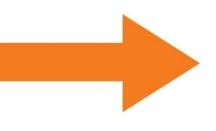




## Cumwhinton





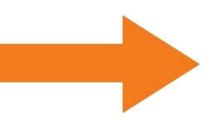


### Cumwhinton



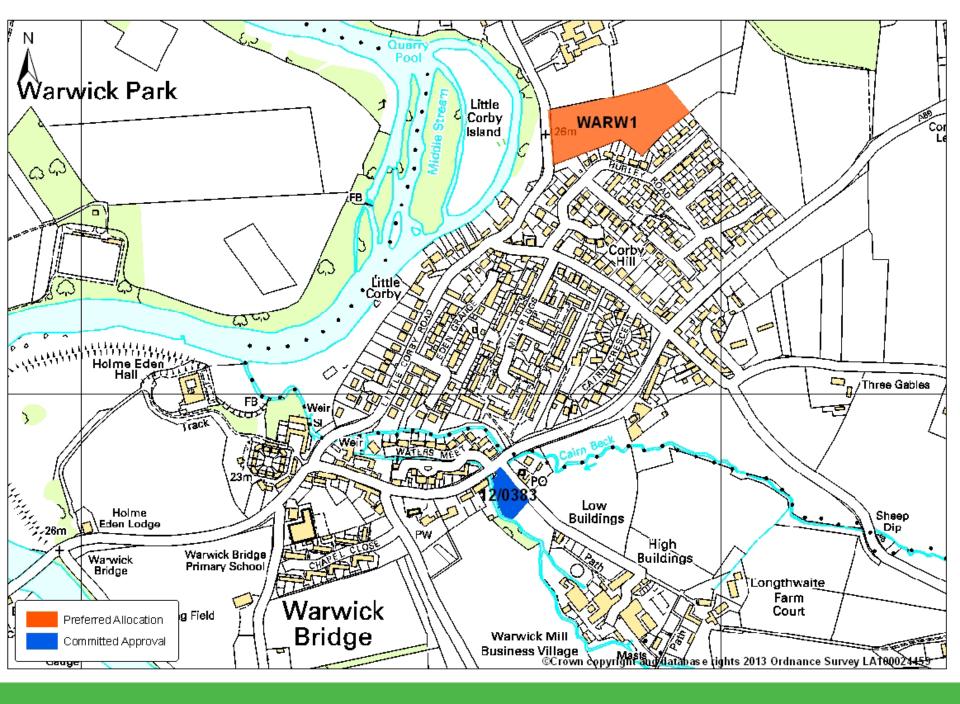
www.carlisle.gov.uk

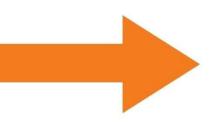
# There were no alternative options to consider in Cumwhinton



## Warwick Bridge



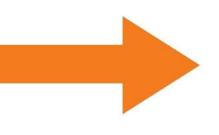




Warwick Bridge

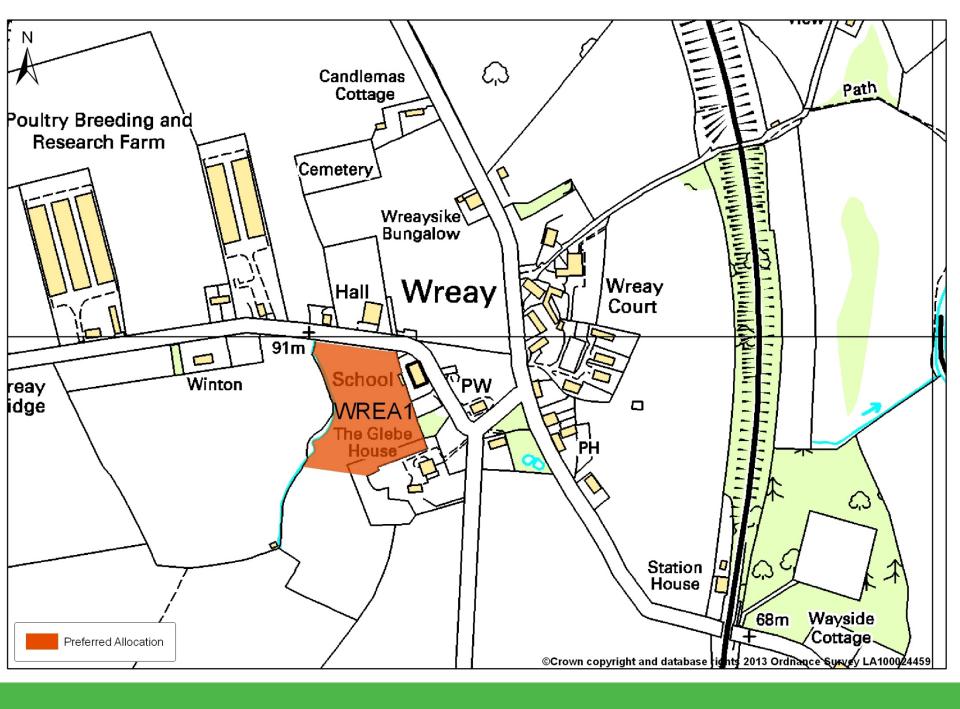


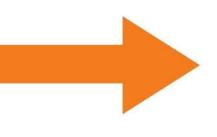
## There were no alternative options considered in Warwick Bridge







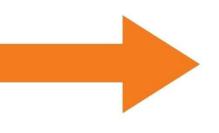








## There were no alternative options considered in Wreay

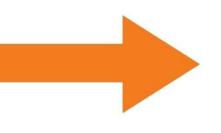


### The Rural Area



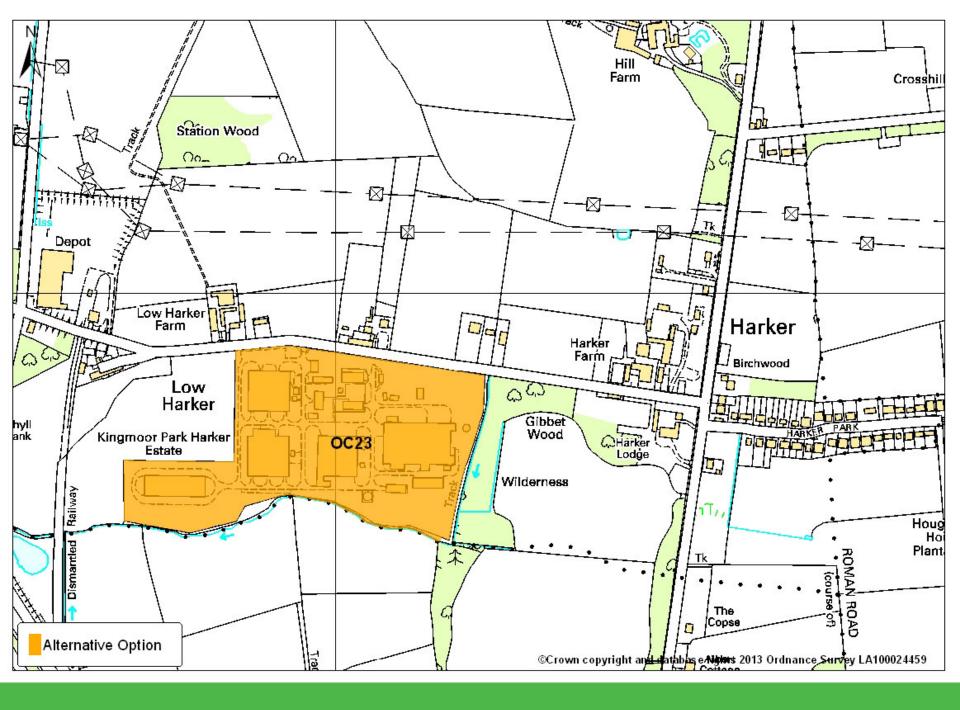
www.carlisle.gov.uk

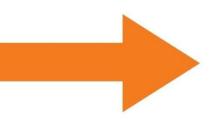
#### Alternative Options in Settlements where **NO** Preferred Allocation has been Identified



### Harker

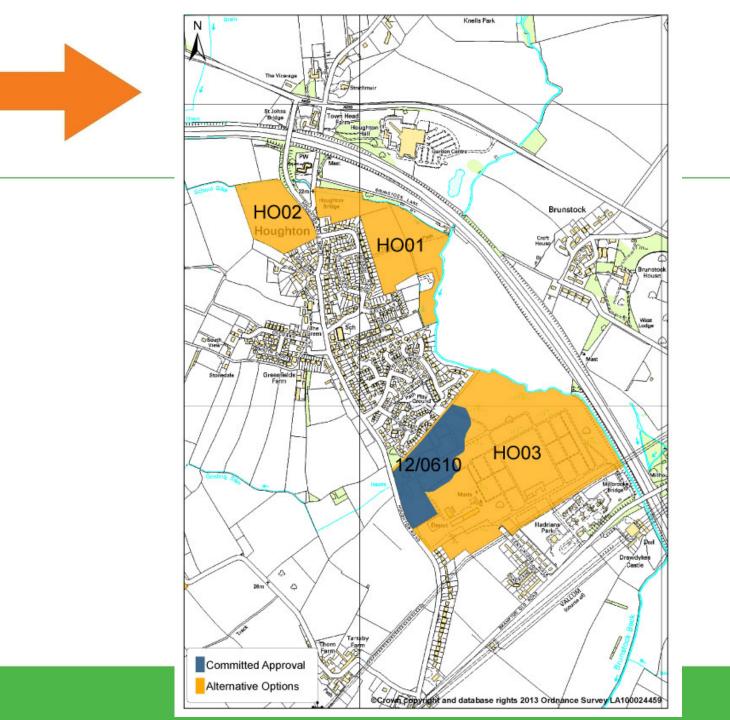




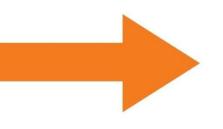


## Houghton



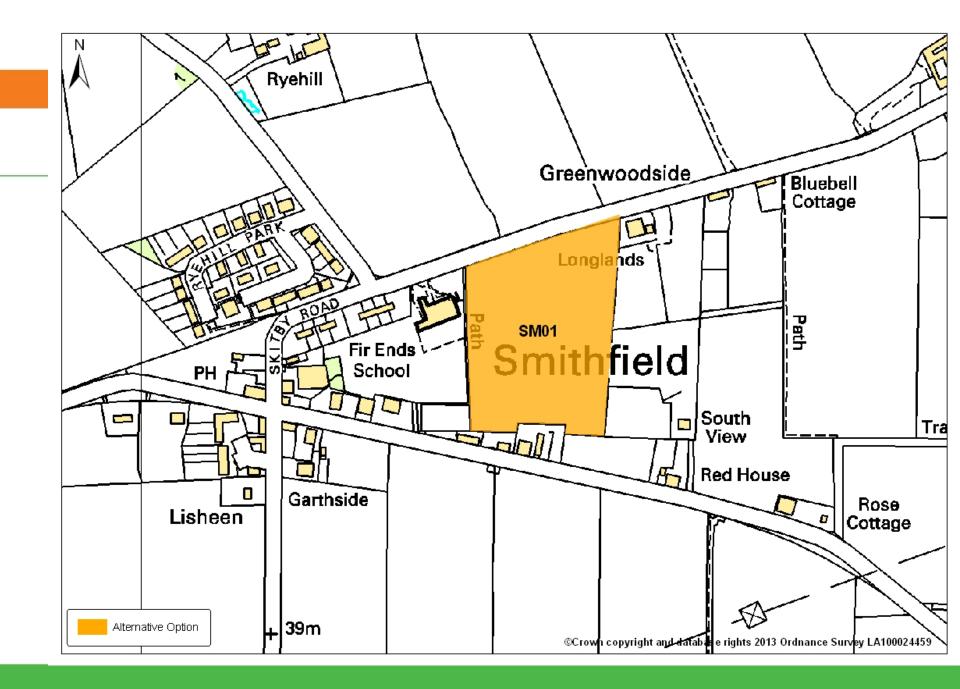






### Smithfield









# Carlisle

