# **SCHEDULE A: Applications with Recommendation**

19/0459

Item No: 03 Date of Committee: 14/02/2020

Appn Ref No: Applicant: Parish:

19/0459 Homes and Communities St Cuthbert Without

Agency (O/A Homes

England)

Agent: Ward:

AECOM Limited Harraby South & Parklands

**Location:** Land at Carleton Clinic, to the west of Cumwhinton Drive, Carlisle

Proposal: Erection Of Up To 160no. Dwellings With Associated Car Parking, Cycle

Parking, Open Space, Landscaping And Associated Infrastructure; All

Matters Are Reserved Except For Access (Outline)

Date of Receipt: Statutory Expiry Date 26 Week Determination

11/06/2019 10/09/2019

**REPORT** Case Officer: Christopher Hardman

#### 1. Recommendation

- 1.1 It is recommended
  - (1) that this application is approved with conditions and subject to the completion of a S106 legal agreement to secure:
  - a) the provision of 20% of the units as affordable (in accordance with the NPPF definition and City Council's SPD proportions);
  - b) a financial contribution of £218,400 to Cumbria County Council towards secondary education capacity;
  - c) a financial contribution of £2,000 per dwelling (i.e.up to £320,000) towards the Carlisle Southern Link Road;
  - d) a financial contribution of £155,000 towards the widening of Sewell's Lonning;
  - e) a Travel Plan Monitoring fee of £6,600;
  - f) the provision of an on-site play area;
  - g) the maintenance of the formal and informal open space within the site by the developer;
  - (2) that should the Legal Agreement not be completed, delegated authority

be given to the Corporate Director of Economic Development to refuse the application.

#### 2. Main Issues

- 2.1 Whether The Proposal Is Acceptable In Principle
- 2.2 Whether The Layout, Scale And Design Of The Dwellings Would Be Acceptable
- 2.3 Impact Of The Proposal On The Living Conditions Of The Occupiers Of Any Neighbouring Properties
- 2.4 Provision Of Affordable Housing
- 2.5 Highway Matters
- 2.6 Drainage and Flood Risk Issues
- 2.7 Education
- 2.8 Open Space
- 2.9 Impact On Trees and Biodiversity
- 2.10 Archaeology and Built Heritage
- 2.11 Other Matters

## 3. Application Details

#### The Site

- 3.1 The site covers an area of approximately 9.15 hectares and is located on the south eastern fringes of Carlisle. The site includes Westmorland House and Cumberland House, Victorian villas set in mature landscape which are no longer in use. The site wraps around The Coppice which remains an operational NHS property. To the south the site contains agricultural land with some mature trees.
- 3.2 Directly to the north of the site is the Garlands development which formed part of the redevelopment of the former Garlands Hospital with which the buildings on this site were associated. To the east is the Taylor Wimpey development which is currently in the later phases of construction and adjacent to that, south east of the site is the Carleton Clinic Hospital. To the south of the site is open farmland and to the west is farmland and the Creighton Rugby Club
- 3.3 The boundaries of the site are defined by a mix of treatments including mature, native species hedgerows, trees and fencing.
- 3.4 A bridleway (Ref 129016) lies adjacent to the site and connects Cumwhinton Drive to the east across the M6. To the north of the site there is a footpath connecting Cumwhinton Drive to Sycamore Lane and Rugby Club.

## **Background**

3.5 There is no planning application history for this site however in 2010 the Council adopted "The Land at the Former Garlands Hospital" SPD and part

of the site is covered by a Tree Preservation Order 307.

## The Proposal

- 3.6 The proposal is seeking Outline planning permission including access with all other matters reserved for later applications. The application description proposes up to 160 dwellings with associated car parking, cycle parking, open space, landscaping and infrastructure.
- 3.7 Vehicular access to the site would be from Cumwhinton Drive and although this is an Outline application the access arrangements are included in this application. The indicative plan proposes three areas for development and each would have its own access arrangements.

# 4. Summary of Representations

- 4.1 Consultation on this application has been undertaken by the posting of site notices, a press notice and direct notification to 23 neighbouring properties. In response 1 comment and 11 objections have been received.
- 4.2 The objections raise the following issues:
  - Had objected to a similar previous development plan identified as Area C
  - When purchasing the house it was confirmed that the open space (Area
     C) served as a valuable buffer between Cherry Lane and the three large
     Victorian "Villas" and future development would not compromise this
  - the development of the perimeter open space will have a significant adverse landscape and visual impact
  - It will be seen as flowing seamlessly into the existing residential estate creating an overpowering urban effect (urban sprawl)
  - Development of area C will impact on privacy, residential amenity and seriously increase traffic noise to properties bordering the proposed development
  - there is already significant housing development already going on in the area and infrastructure is inadequate to meet the ongoing development
  - This will increase demand on already overstretched infrastructure
  - During consultation event, was assured that area C would be restricted to a small number of single storey homes - this is not reflected in the documents and a higher number of two-storey homes are proposed
  - eastern half of C rises sharply in height approx 10m in a short distance (30m)
  - There will be significant overshadowing and overlooking of homes that are bordering this area, regardless of height
  - Due to steep sloping nature of Area C, surface water is shown to flow down towards current houses on Cherry Lane - this will create a significant flood risk for existing homes
  - There is a potential vehicular link between areas B and C creating a circular route to/from Cumwhinton Drive resulting in high volume of traffic extremely close to rear of existing homes increasing noise and having a significant adverse effect on current homes and families

- Documents suggest health care facilities are located close to development site but this is misleading as they are specialist facilities and general access health care is some distance away
- Area C should not be developed and should be retained as a green space buffer between existing development and areas B & C and other larger development as part of the proposed Garden Village
- Another sprawling estate inappropriate to the scale and character of the surrounding area
- no need for additional housing in this already crowded neighbourhood
- will cause further traffic problems especially at the start/end of school/working day
- this proposal is a development with no infrastructure or integral facilities and should not be permitted
- does not dovetail or enhance the proposed Carleton Garden Village
- hardly sensitive expansion, it is simply insensitive use of beautiful green fields
- the proposal will not promote healthy lifestyles with a focus on high quality homes, locally distinctive spaces and inclusive facilities
- communities need a central focus for schools, leisure facilities, convenient shops and amenities the nearest of which are over 1 mile away
- the area is being totally swamped by developments and further development will increase the strains on already inadequate existing infrastructure
- nearest schools and shops are at Harraby and doctors is only 2 days a week
- garlands road is a narrow, badly surfaced lane with a large volume of traffic, especially dangerous when there are school buses picking up, setting down school children
- bus service only runs every 30 minutes and not at all on Sundays
- a feature of the area is the large copse of trees which would have to be partially destroyed
- existing broadband is totally inadequate
- this is another unnecessary and opportunist proposal by developers seeking to cash in on the publicity created Garden Village project
- this will mean an extra 350 houses including Taylor Wimpey development resulting in a significant increase in traffic and resulting safety risks
- infrastructure has not been improved to cope with this increase
- visually the area will be diminished by this additional housing
- existing bus service has been cut to 2/hr despite increased number of residents - not convenient or environmentally helpful
- local medical centre is not available
- whilst wanting to be part of a green environment overall urbanisation is increased and rural open space further diminished
- loss of amenity open green spaces allied with nature/wildlife have significant psychological and general health benefits
- wildlife should be protected and not put at risk be development
- should include wildlife friendly corridors/areas in conjunction with RSPB should include things like bricks for swallows/swifts
- currently enjoy buzzards, sparrowhawks, great spotted woodpeckers, squirrels and occasional bats - best protection is for the application to be

#### refused

- Area C is very close to Cherry Lane and Twickenham Court would be better retained as a buffer
- houses will detract from amenity changing agricultural land to housing
- local area has seen significant residential growth in last 2 years and this incursion detracts from the quality of the environment
- it will exacerbate shortcomings in provision of related services not addressed by this application
- when moved to Parklands village it was sought after estate quiet and safe for children with higher end houses, the two new developments are bringing house prices down
- roads are no longer safe higher flow of often speeding traffic has swamped the roads
- this was a nice peaceful area but if this goes ahead it will be more building work, more noise and more heavy vehicles - this is not what I moved here for
- cumulative effect with recent development will put enormous pressure on limited infrastructure and amenities - inevitably it will become downgraded
- already parking problems and congestion at certain times of day
- Parkland Village was a planning success put in danger once limited amenities are overburdened
- the appearance will change as more of the trees are cut down to make way for development
- goes against the principles of "Garden Villages"
- If development goes on unchecked Parkland Village will rapidly deteriorate or involve costly upgrading of services
- The aggregated effect of already approved developments is over 500 new homes within a small geographical footprint on the southern edge of Carlisle, there is limited infrastructure and facilities for residents, already stretched road system and little evidence of improvements or planned enhancements
- Almost no cycling infrastructure and distance to local shops results in a large proportion of journeys by car with associated environmental impact
- Cumwhinton Drive has become a single carriageway during working hours due to large volume of car parking on the Eastern side of the road
- shortfalls persist in spite of approach to such needs set out in Carlisle's Infrastructure Delivery Plan
- This site is not a new one, in 2010 suitability of land around Carleton Clinic was assessed and concluded strong statements regarding constraints and anticipated improvement requirements
- area has seen an influx of new residential property but support services and facilities have not been developed
- Highways Authority advised that Cumwhinton Drive required upgrading to local distributor road standard - this development should be linked to ensure satisfactory linkage to the A6
- TPO 247 applies to all significant trees limiting the developable area of the site
- there are three attractive, substantial sandstone three-storey buildings which should be retained
- Fail to see the need for 160 new dwellings in Parkland Village located on the indicative boundary of 10,000 homes intended for St Cuthbert's

- Garden Village
- Homes England is now determining housing needs and sponsoring development rather than Carlisle City Council
- This would forever change the character and appearance of Parkland Village
- All of the trees and shrubbery should be retained for the wide range of wildlife - it defines the locality
- there should be no need to demolish the Victorian villas
- NHS would lose about 30 parking spaces currently in use by the villas so there would be even more parking on Cumwhinton Drive restricting traffic flow
- This will take away one of the green areas left following the loss of the nearby area developed by Taylor Wimpey
- Further development will change this into a housing estate rather than a mixed housing/green area
- the development being around the character old buildings of the old hospital emphasize the detrimental nature of the development
- traffic problems will be exacerbated by all access roads onto Cumwhinton
   Drive rather than on the main road
- increased traffic using the mini-roundabout has made it increasingly dangerous and several accidents/incidents have occurred
- the use of the roundabout needs to made safer by extending sight lines and redesigning the junction
- there is a fundamental point of sufficient capacity at local schools for further new pupils
- there are no additional school places or education facilities proposed and local schools are already over subscribed
- is there any need for further development at all?
- at the recent consultation event there was reference to a major development for the Brisco area - surely this should be taken into account when taking a view on housing needs for the whole area
- this places greater stress on already overloaded infrastructure
- It is now regarded that having access to green spaces can reduce health inequalities, improve mental health and well-being
- the Story housing site was sold as a village, and a village by definition is situated in the rural area - the latest developments reduce green spaces and rural area amenities and impinge on the quality of life we are buying into when choosing to live here
- Infrastructure falls short of what is needed to meet existing demand never mind the additions proposed
- 4.3 An objection has also been received from County Councillor Ms Earl who makes the following points:

Existing road infrastructure needs upgrading

- there are already big safety issues on Garlands Road and Cumwhinton Road due to speeding
- the existing mini-roundabout is not fit fur purpose due to the amount of traffic
- there are two other developments currently causing big issues on the highway in terms of potholes and other road problems

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- concerned about lack of detail for school places
- 4.4 The comment has been received from City Councillor McNulty who is also a local resident with the following observations:
  - transport assessment doesn't go far enough in assessing the increased level of traffic that this and other developments will have to access roads around the area
  - increased traffic provides increased levels of speed and some consideration needs to be taken to controlling speeding on these roads (Sewells Lonning, Cumwhinton Road, Garlands Road)
  - Consideration needs to be given to the mini-roundabout which is not appropriate for current use and the potential traffic flow through Forest Hill and Hopes Hill
  - More details are needed around development impacts on local services including schools
  - Cycle parking is referred to although this is not clear and additional cycling routes are not identified
  - With the City Council's commitment to tackling climate change the application looks at existing sustainable transport routes rather than enhance and encourage the use of those routes

## 5. Summary of Consultation Responses

**Northern Gas Networks:** - No objections however there may be apparatus in the area that may be at risk during construction works and should the application be approved we require the promoter of those works to contact us directly to discuss requirements in detail;

**Cumbria County Council - (Highways):** - Cumbria County Council (CCC) requested further information in the initial response dated 30th July 2020. The application provided further information on 17th October 2019 in respect of visibility splays and an assessment of accidents at Cumwhinton Road / Garlands Road junction.

Visibility Splays – the applicant confirmed that a 60m visibility splay could be achieved with the removal of trees but considered a lower visibility threshold was achievable. However, due the current unadopted status of part of Cumwhinton Drive and the advisory 20mph limit in place it is not currently possible to carry out an appropriate speed survey to demonstrate that the visibility splay can be reduced. As the planning officer for this application you have confirmed that it will be acceptable for additional trees to be removed in this location to achieve 60m visibility splay. Therefore, I consider that an appropriately worded condition should be part of the decision notice to ensure visibility splays are adequately achieved.

Accident assessment of Cumwhinton Road / Garlands Drive junction – the applicant has provided further information, which demonstrates they have investigated accidents at the roundabout. They conclude that there is no common pattern that would warrant a safety issue at the roundabout. CCC accepts this conclusion and, therefore, removes its request for improvements at the roundabout.

Right turn lane to Cumwhinton Road / Cumwhinton Drive – there has been no further information from the applicant to support the removal of this. A

condition for this will be recommended for inclusion a part of the decision notice.

2m wide footway along Cumwhinton Road – Again there has been no further information from the applicant to support the removal of this. A condition for this will be recommended for inclusion a part of the decision notice. Sewell's Lonning – In the response dated 30th July the County Council requested a contribution of £555,000 for the widening of Sewell's Lonning. It is still considered that the requested contribution is appropriate. However, it is noted that a submission for LEP funding has been made for the improvements at Sewell's Lonning. If successful, this would reduce the S106 requirement from £555,000 to £155,000. If the City Council are minded to agree a reduced contribution based on the LEP bid the County Council would not object on that basis.

Impact on sustainable travel – Information to support this is normally provided in the form of a travel plan. As this is an outline application it is considered that submission of this can be provided at a later date. Therefore, a condition is proposed for this. It should be noted that a further S106 contribution of £6600 is requested for the monitoring of the Travel Plan.

Carlisle Southern Relief Road - The site will form part of part of St Cuthbert's Garden Village it is therefore considered that it is appropriate that a contribution of £2,000 per dwelling which equates to £320,000 is required towards the Carlisle Southern Link Road which is considered essential for the delivery of the Garden Village. The Highway Authority would not wish to raise an objection to the above application subject to the following: A Section S106 Agreement is agreed for the following contributions in relation to highways and transport:- £2,000 per dwelling which equates to £320,000 – Carlisle Southern Link Road; £155,000 towards the widening of Sewell's Lonning; £6,600 Travel Plan Monitoring fee

Cumbria County Council - (Lead Local Flood Authority):- The applicant in their letter dated 17th October 2019, have provided additional assessment in relation to the questions asked within our first response. I have considered these and can confirm that I consider a suitable drainage system can be provided to comply with current drainage requirements. The discharge into the Durranhill Beck tributary is to a point just upstream of a culverted section and a CCTV survey of this is requested to ensure it is in adequate working order. Therefore, the LLFA have no objection to this application subject to conditions;

**St Cuthberts Without Parish Council:** - Understood that the proposed site location was not identified in the Local Plan for housing development. If permitted this will set a precedent (compounded by the scale of the development) that will significantly compromise not only the vision, objectives and principles driving the Garden Village, but the Local Plan 2015-2030 itself. Therefore object to the development.

If minded to approve the application have the following comments: The Transport Assessment doesn't capture that the proposed development would be accessed from an unadopted road which is in very poor condition - would want to see conditions imposed to ensure Cumwhinton Drive is improved so that it can be adopted by the highway authority. The speed limit on this road also needs to be taken into account. Improvements need speed calming measures recognising the significant increase in road traffic movements and increased risk of collision over the crest of the hill negotiating

the T-junction just to the south

When assessing public open space the sports provision are not part of the open space and are reserved for private club use

The site is on an elevated position and additional impermeable surface will increase the flashiness and quantity of water discharging into the existing overburdened surface water system - evidence of more detailed assessment and how it will be managed needs to ensure that the risk of flooding downstream will not be increased

The development is silent on impact on local facilities e.g. education and need to understand how these impacts will be addressed.

How will the local broadband network be enhanced to ensure the development is fit for the future

This is a special area due to its protected trees, recognise disease and safety are key considerations but want conditions to ensure continued protection of these special trees and enable their long-term future

Environment Agency: - No response received;

**Local Environment - Waste Services: -** Will await a reserved matters application if outline is approved as this will detail the road layout. Please advise the applicants to ensure the road layout is suitable for waste collection vehicles to access;

Cumbria County Council - (Archaeological Services): - In the event that planning consent is granted a scheme of archaeological investigation and recording should be undertaken in advance of the development. In addition both Cumberland House and Westmorland House should be recorded prior to any works being undertaken.

Natural England: - No comments

**Local Environment - Environmental Protection: -** Recommend conditions relating to contamination and remediation, control or working hours and potential noise attenuation, dust prevention measures for transportation of materials and electric vehicle charging points in relation to air quality

Planning - Access Officer: - No objections

Cumbria Constabulary - North Area Community Safety Unit (formerly Crime Prevention): - It is acknowledged that the published Masterplan is purely indicative and the final layout of access routes and orientation of dwellings are yet to be decided. The comments in the published Design and Access Statement relating to safety and security (particularly surveillance opportunities and overlooking) of the development are noted, however, from my interpretation new footpaths and links to existing routes are not ideally placed to attract surveillance, so scrutiny of firmer proposals is required. This site is extensively landscaped, so surveillance opportunities in parts are already compromised. In the event of an application for full permission being forthcoming, I would welcome additional information on how compliance with Policy CM 4 will be achieved.

**Cumbria County Council (Education):** - As part of the County Council response dated 30th July 2019 a contribution of £564,742 was requested in relation to secondary education capacity. Whilst it is still considered that the requested contribution is appropriate, it is acknowledged that the applicant has submitted a robust viability assessment which demonstrates that the development is not viable with all of the requested contributions. Therefore as in line with the County Council's Planning Obligation Policy (2017) which explains that consideration can be given to the potential to reapportion

contributions or seek revision to the proposal having regard to the most important agreed priorities and outcomes for a locality and the requirement that a scheme suitably and sustainably integrates with local communities and services. On that basis a reduced contribution of £218,400 is sought in relation to secondary school education;

**Sport England North West:** - No detailed response on the specifics of the application however provides advice in relation to development and demand for sport;

**United Utilities:-** Comments that drainage conditions should be applied relating to a surface water drainage scheme, foul and surface water should drain on separate systems and a sustainable drainage management and maintenance plan should be put in place, further advice is available on the protection of any United Utilities assets.

## 6. Officer's Report

#### **Assessment**

- 6.1 Section 70(2) of the Town and Country Planning Act 1990/ Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan, unless material considerations indicate otherwise.
- The relevant planning policies against which the application is required to be assessed are the NPPF, PPG and Policies SP2, SP3, SP5, SP6, HO1, HO2, HO4, IP1, IP2, IP3, IP4, IP6, IP8, CC4, CC5, CM2, CM4, CM5, HE6, GI3, GI4, GI5 and GI6 of The Carlisle District Local Plan 2015-2030. The council's Supplementary Planning Documents (SPD) "Achieving Well Design Housing", "Affordable and Specialist Housing", "Trees and Development" and "The Land at the Former Garlands Hospital" and the National Design Guide are also material planning considerations.
- 6.3 The proposal raises the following planning issues:

#### 1. Whether The Proposal Is Acceptable In Principle

- 6.4 This application is located on the south eastern fringe of Carlisle adjacent to the Garlands development and opposite the Taylor Wimpey development. The site is located on land formerly used by the hospital trust and is surplus to requirements. In 2010 the Council considered that some of this land may come forward as a windfall site and a development brief was prepared acknowledging that the surplus assets could be redeveloped. At the time, no application was forthcoming and this new application incorporates the previously developed land and an adjacent field to the south west.
- 6.5 In planning terms the site is not allocated and would therefore be considered as windfall development, however the Council has considered part of the site for development previously as detailed in paragraph 6.4. The southern part of the site lies within the garden village red line boundary, whilst the northern part lies within the existing urban area of Carlisle. The development of the

northern part of the site can be considered against the windfall policy in the adopted Local Plan, as well as other relevant policies regarding trees, heritage assets etc. For the southern part of the site, Policy SP3 provides the framework in the adopted Local Plan for how the garden village should be brought forward, and this policy sets out that the development of the area should be in accordance with a masterplan which will ultimately be adopted as a DPD. The policy also seeks to control piecemeal development proposals within the area which are likely to prejudice delivery including the infrastructure required, i.e. developers can't just come along and build an isolated housing estate which bears no relation to the wider garden village area and doesn't make any contribution to wider infrastructure.

- 6.6 In dealing with Policy HO2, the northern part of the site accords with the criteria in the policy on the edge of Carlisle and utilises previously developed land and can be contained within the landscape. The principle of development on this part of the site is therefore acceptable.
- 6.7 A number of objectors have pointed out that Policy SP3 covers the southern part of the site and the development of this land would be contrary to this policy. As work on St Cuthbert's Garden Village progresses the Council will come under increasing pressure to release sites not only as it was always intended that some land in the wider area of the Garden Village would be developed prior to the Garden Village formally commencing as this will maintain the planned level of growth and five year supply of housing in Carlisle. Whilst we currently have a five-year supply of housing, the majority of housing allocations are now being developed and St Cuthbert's Garden Village is seen to be the next source of significant housing growth in the district. The consideration for Members is whether the proposal to develop a very small part of the Garden Village area would be acceptable. Members should also note that the application site is only partially within the Garden Village. The following paragraphs undertake to examine the principles of Policy SP3 in the context of this application.
- 6.8 Stage 1 or the masterplanning has been completed. This sets out the vision and concept for a series of villages located around Cummersdale, Durdar, north of Brisco and Carleton. It also puts forward 9 guiding principles which are based on the original garden city principles and are intended to guide the future development of homes and neighbourhoods. The principles take into consideration current best practice from across the UK and wider, in relation to the creation of successful living environments
- 6.9 Stage 2 of the masterplanning is underway and consultation has been undertaken. Two key parts of this commission are to draw up options on which to consult, and then develop a preferred option which will need to be tested against the vision, drivers and principles defined as part of the earlier concept work. The preferred option will also be subject to a more technical assessment including:
  - Transport modelling to confirm the on and off-site highway mitigation requirements etc;
  - Drainage assessment including to confirm a drainage strategy;
  - Utilities assessment;

- Ecological mitigation required;
- Health impact assessment;
- Landscape and visual impact mitigation.

The Local Plans team will draft the scope of the policies and the preferred options version of those policies. The whole process will also be subject to a Sustainability Appraisal and Habitat Regs Assessment. There is also a need for all development to comprehensively contribute to the provision of a range of infrastructure through S106 agreements, and work in this respect, i.e. viability and infrastructure delivery plan is currently being drawn up.

- 6.10 The process of developing the masterplan and ultimately the DPD is hinged on seeing the Garden Village as a whole entity, with each village delivering on the principles, and each development parcel will ultimately relate to the wider area through design, connectivity, infrastructure contributions etc. Homes England undertook lengthy pre-application discussions with the City Council and County Council to develop proposals that recognised the site's unique location on the edge of Carlisle and the edge of the Garden Village. Due to this mix of policy considerations additional work was forthcoming such as the Design Code as a way of ensuring the Garden Village context was developed where possible.
- 6.11 It is therefore important that the 9 guiding principles for the Garden Village are not compromised to ensure that the release of this site is policy compliant with the policy aspirations for St Cuthbert's Garden Village and does not compromise the masterplanning and DPD work.
  - (i) Deliver a landscape led masterplan that harnesses the rivers, world class views and woodlands to create a network of unique, high quality, active landscapes and new destinations.

The existing woodland is a great asset to the site and would give the development an interesting setting. This landscape theme needs to be translated into the new planting proposed next to the Cumwhinton Road edge. If this is included, it would integrate the new development with the historic hospital woodland to the north. Incidental tree planting in area A could also follow this clustered pattern of planting near the main roadways. A woodland circular walk is indicated which would be an attractive addition to the development. The potential play space is indicated in the centre of the development, it may, however, be necessary to create a smaller play area within 'A' to accommodate younger children- a maximum of 250m from front door to play area distance is recommended for toddlers in the Fields in Trust Design Guidance.

(ii) Support locally distinctive, design of buildings, streets and spaces to create memorable and unique places to live.

Sensitive landscape planting will help support the integration of new hor

Sensitive landscape planting will help support the integration of new homes within the existing landscape character. Architecturally there are a mixture of characters, locally, from 1960-70's houses to more ornate arts and crafts style homes. The illustrative masterplan shows three separate house typologies; semi/detached estate planning, formal urban terraces and self-build homes. The precedents associated with each sub area development area are quite different. The layout for area A suggests that it

contains more traditional detached, and semi-detached, homes and the precedents shown support this impression. Area B is more contemporary terraced housing and Area C comprises detached self-build homes, again, with a more traditional appearance. The Carleton Clinic site may set a precedent for the standard of homes for the Garden Village, which is indicated in the text, and a more contemporary approach throughout may be a way of signalling that a new type of development is expected. The site approach promotes three distinct, and contrasting, approaches to housing provision, and design, almost to the point of being a demonstration show site.

(iii) Promote a mix of high quality homes in distinct and integrated lifetime neighbourhoods.

The mix of housing types and tenures should reflect the objectives of creating a balanced and sustainable neighbourhood, and, include a percentage of affordable homes as well as lifetime home designs.

(iv) Focus inclusive communities around a hierarchy of excellent facilities clustered around village centres.

The site has the character of open woodland with glades and no boundary treatments (hedges, walls). This open character invites people into the site and should be preserved where possible. Accessibility to the woodland walks, and play space, to the adjacent community is welcomed.

(v) Support a variety of entrepreneurial and creative employment and skills opportunities.

Whilst this is not an employment proposal, access to home office facilities are encouraged including high speed broadband. This also suggests house forms that can be readily extended or adapted to the needs of home workers.

(vi) Promote health and well-being through accessible facilities and healthy lifestyles for all ages.

This development has the potential to encourage residents to play/ exercise and walk outdoors because the quality of the outdoor space is high. The bigger challenge is encouraging healthy routes to local facilities, including access to sports, education and retail services in Harraby.

(vii) Support low carbon living through sustainable planning, transport and energy.

Sustainable Urban Drainage System details are not shown at this stage although they are indicated as the method of surface water disposal, swales and balancing ponds may be expected in a development of this type. Rainwater harvesting could be considered or a green roof approach. At this outline stage, no information is given on the thermal performance, renewable technology carbon reduction or green material choices.

(viii) Provide excellent sustainable connections and environments that make walking, cycling and public transport the most attractive method of getting from A to B, making the most of the opportunities presented by the Carlisle Southern Link Road.

Routes to local employment centres, and transport hubs, need to be considered including lit cycle routes into Carlisle. Bus stops close to the site

with an appropriate frequency of service will help to reduce the reliance on private cars. This is discussed further in the highways section of this report including the need to contribute to the CSLR.

(ix) Continue to positively engage a range of people and communities in design, delivery and stewardship.

The involvement of Homes England indicates that the development is likely to move forward. If the application is approved it will be necessary to understand the disposal and delivery strategy, particularly whether this has influenced the emerging design.

- 6.12 The proposal has elements that contribute to the nine principles of the Garden Village however as this is an outline application it is reliant on further detailed plans coming forward at Reserved Matters stage. Later in this report are consideration of design, highways and other infrastructure which are key components of delivery for the Garden Village. It is envisaged that more development will take place in this part of Carlisle and this site will seek to raise the standard of design from the recent Persimmon and Taylor Wimpey developments ensuring that the Garden Village provides a different context for future housing.
- 6.13 In the context of Policy SP3 it states:

"To enable a comprehensive and coordinated development approach, piecemeal or unplanned development proposals within the area which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted."

From the analysis above the guiding principles of the Garden Village are not being compromised and this development is focussed on delivering a strong sense of place making and design principles to help set a clear precedent in the Garden Village area for future development to follow. The application site will also act as a stimulus for the local housing market within the Garden Village area by attracting new market entrants along with playing a crucial role in kickstarting development within the area. On this basis the proposed development is acceptable in principle. Some of the detailed matters arising from these principles are discussed further in this report.

# 2 Whether The Layout, Scale And Design Of The Dwellings Would Be Acceptable

- 6.14 This application is in Outline form and the layout, scale and design are reserved for a later application. Although there is an indicative layout for the site, this masterplan would not form part of the approved documents. The application description states that it is for the erection of up to 160 dwellings which provides an overall indication of the proposed scale although no specifics on how this would vary throughout the site are provided as further details will be required in future Reserved Matters applications.
- 6.15 There are a number of considerations in relation to design which are relevant to this application. As discussed earlier in this report, the application falls

partly within the area of St Cuthbert's Garden Village and since submission of the application the Government has published the National Design Guide (NDG). Both these references would be picked up in any future Reserved Matters application however given this context it would be prudent to establish appropriate design parameters at this stage which could then influence any future application and, as the applicant is not a housebuilder, and sale of the land so that prospective purchasers can take into account the requirements.

- 6.16 The applicants, Homes England, understand the importance of good design and place making which is key objective with Homes England Strategic Plan and aligned with this approach, the applicant has submitted a high level Design Code as one of the key documents accompanying the application. The NDG recognises that specific, detailed and measurable criteria for good design are most appropriately set out at the local level and references a variety of tools such as design guides, design guidance or design codes including those prepared by applicants to accompany planning applications. Given this site's location within the St Cuthbert's Garden Village area it would be appropriate to ensure that the design concepts of the garden village are incorporated within any planning permission.
- 6.17 The applicant's Design Code has been developed by referencing a range of design material such as national guidance from the Urban Design Compendium, Manual for Streets 2 and Building for Life 12 as well as the Council's own SPDs. It then goes on to indicate design parameters that will influence future applications including developable areas and landscape buffers/green infrastructure to ensure integration of the site into the existing setting as well as aiming to create different neighbourhoods and character areas within the development. This is to help attract a range of developers to deliver this site.
- 6.18 Access and connectivity is important in ensuring that this development does not sit in isolation, it needs to meet local housing requirements and create a sense of place. A sense of place is always more difficult to define when an area will physically change by the presence of development but by defining specific parcels of land for development they can each build on the different characteristics of the site.
- 6.19 The Design Code also considers and offers examples of the quality of materials, the differences between public and private space and ensuring that properties are designed with space for storage whether for cycles/scooters for more sustainable travel or for the variety of waste receptacles for recycling. Although not setting out specific densities, there are three distinct areas of the site which require different design interventions to ensure that the local landscape and character is taken into account.
- 6.20 The concepts set out in the Design Code embrace many of the issues being developed throughout the garden village and whilst the specific details are not established in planning policy the intention is that this design code will ensure that the site's development runs in parallel to its evolution and will avoid any potential conflicts. Members may be aware that the Building Better, Building

Beautiful Commission has issued "The Living in Beauty" Report to the Government. Whilst the response from Government is awaited and how this would be translated into policy, it is noted that the NDG already contains measures to achieve better design and the use of a Design Code for this site would enable this to happen.

6.21 All the features set out in the Design Code are a positive interpretation of what the NDG is seeking to achieve. It would therefore be appropriate to ensure that not only is the Design Code part of the approved documents but is also specifically conditioned to be complied with as part of any future applications.

# 3 Impact Of The Proposal On The Living Conditions Of The Occupiers Of Any Neighbouring Properties

- 6.22 The Council's SPD "Achieving Well Design Housing" sets out standard distances between properties to ensure an element of privacy is maintained. This is an Outline application and there are no detailed plans of the proposed layout at this stage. Given the scale of the site and proximity of any neighbouring residential properties to the north and east the SPD requirements can easily be complied with.
- 6.23 The site surrounds The Coppice and care needs to be taken not only for future occupiers of the site and that property but significantly during construction. Noise and dust can be disruptive and measures should be taken to ensure that any potential nuisance is minimised. This would be conditioned through a Construction Management Plan for the site.
- 6.24 Some objectors have raised concerns about the development of Area C as this is closest to residential properties on Cherry Lane and Twickenham Court. The land slopes significantly at this point and care will have to be taken in the design of any properties to ensure that they make effective use of the landscape without significant changes to its natural form. As some of the properties will be built into the slope it would provide an opportunity for more individual style housing and levels would have to be agreed to avoid overbearing use of retaining structures. Through good design it would be possible to orientate a number of dwellings and avoid any direct overlooking given the orientation of existing properties. Whilst some regard the view as important, there has been extensive redevelopment of the former hospital site and making use of surplus public sector land is a Government priority in bringing forward land for housing. This should be done at any price and further work on any subsequent applications should set out how Area C can be brought forward whilst retaining its character.

## 4 Provision Of Affordable Housing

6.25 The application site falls within Affordable Housing Zone B, which requires a 20% affordable housing contribution. Local Plan Policy HO 4: Affordable Housing stipulates that the affordable housing provision should be 50% affordable/ social rent (usually through a Housing Association) and 50% intermediate housing (usually discounted sale at a 30% discount from market

value through the Council's Low-Cost Housing Register).

6.26 The Council's most recent Strategic Housing Market Assessment (SHMA) identified the need for 295 affordable homes per annum across Carlisle District, including 201 in the urban area, over the five-year period of the assessment. The housing need by property type and tenure identified in the SHMA is made up as follows:-

Tenure: 70% affordable/ social rent & 30% intermediate.

Property type: 70% 1-2 bed properties & 30% 3/ 3+ bed properties. In the Housing team's experience 2-bed houses, 2-bed bungalows, as well as 3-bed houses are usually popular with Housing Associations; while smaller 3-bed houses, followed by 2-bed houses are generally the most popular unit types with people on the Council's Low Cost Home Ownership register.

- 6.27 In the case of this application, assuming the final development is for 160 units, the affordable housing element, based on 20% (Zone B affordable housing requirement) would be 32 affordable units (16 for social/ affordable rent and 16 for intermediate low-cost home ownership).
- 6.28 There are further details in the Council's assessment and in particular bungalows (designed to flexible and adaptable design standards) for elderly people were identified as a priority due to the ageing population. POPPI (Projecting Older People Population Information Systems) data projects a 37% increase in the population aged 65 or over in Carlisle between 2017 and 2035 (including a 94% increase in people aged 85 and over).
- 6.29 To meet the increasing needs of the older persons population, the Council's Affordable and Specialist Housing Supplementary Planning Document (SPD) recommends the inclusion of 10% bungalows (or other housing suitable for older persons) on sites of 100 or more units (Section 11.2 Table 6). Other housing suitable for older persons includes:-
  - Adaptable ground floor apartments
  - Adaptable upper floor apartments, serviced by a lift
  - Dormer bungalows, incorporating a ground floor w/c and washing facilities that can easily be converted to a wet room.
- 6.29 The Council's approach in planning for adequate provision to meet the requirements of older and disabled persons is supported by the Government's recent update to National Planning Practice Guidance (NPPG): "Housing for older and disabled people":-

"Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage — both in terms of cost and with regard to people being able to remain safe and independent in their homes. Accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs." (Paragraph: 008 Reference ID:

63-008-20190626. Revision date: 26 June 2019).

- 6.30 The site Design Code divides it into three sections: Areas A, B (which would retain Cumberland House under the applicant's preferred option) & C. The Planning Supporting Statement stipulates that the affordable housing provision is "likely" to be in Area A, however this will be discussed and considered by the Council at the Reserved Matters stage. The Council is committed to mixed sustainable communities principles, and the existing proposal could potentially be at odds with Local Plan policy HO4: "The siting of affordable housing within a development also needs careful thought to ensure that it is not concentrated within one area of the site, but is integrated throughout the development. This approach will provide greater opportunities for community cohesion".
- 6.31 On the basis of the above the site will provide for affordable housing. It should be noted that in relation to Local Plan Policy IP8 the applicant informed the Council that it would not be viable to deliver all the required planning obligations. In line with the policy, a viability assessment was provided and was independently checked by the Council's adviser. The amount of money available for S106 contributions does fall short of the total required for both the City Council and County Council requirements. Following further discussions and negotiations between the parties, as the applicant in this instance is Homes England who have a track record of assisting with housing delivery, particularly affordable housing, it would not be appropriate to reduce the affordable housing contribution. This means that a 20% policy compliant contribution is to be delivered however this does have consequences for other contributions.

## 5 Highway Matters

- 6.32 This Outline application includes access as part of the application and was accompanied by a transport assessment in relation to the additional traffic generated from the proposed development. The County Council as Highway Authority has assessed the transport assessment and the proposed access arrangements to the site on the basis of three different zones being provided.
- 6.33 There have been a number of developments in this part of Carlisle with ongoing schemes opposite this site by Taylor Wimpey and Gleeson's Moorside Drive development. The issue of increased traffic in the area has been raised on a number of occasions and the transport assessment needed to assess not only this scheme but the combined impacts on road junctions in the local area.
- 6.34 In addition, given the principle of development acknowledges that part of the site is within the St Cuthbert's Garden Village it is important that consideration is given to the transport infrastructure required for the delivery of the Garden Village.
- 6.35 The Highway Authority considered that there were a number of local impacts and the applicant was asked for further information in order to provide a robust assessment of the likely impacts. Many of the local traffic impacts

have been raised by local residents.

- 6.36 The assessment has concluded that in relation to the individual access points onto Cumwhinton Drive appropriate visibility splays can be provided although there may be implications for protected trees. This is based on standard visibility splays and whilst these may be reduced on evidence of a speed survey the road is currently unadopted due to the development on the Taylor Wimpey site which has a temporary speed limit reduction to 20mph. At a later date when Reserved Matters applications are received it may be possible to amend this (to reduce the length of visibility splay) however for this application it would be appropriate to impose the need for 60m visibility splay at this point in time.
- Outside of the immediate access points, but in the local vicinity, the Highway Authority still requires a right turn lane at Cumwhinton Road/Cumwhinton Drive and a 2m wide footway along Cumwhinton Road. It was also highlighted initially that further information was required in relation to the Cumwhinton Drive/Garlands Road roundabout however as no common pattern of accidents has warranted a safety issue no improvements are required from this proposed development.
- 6.38 In the wider locality it has been noted that many journeys will use links through to London Road (A6) and although improvements were made to widen Sewell's Lonning as part of the Speckled Wood (Persimmon) development this only covered part of the length of the lonning and the remainder remains a narrower one-way route. Increased traffic from this proposed development will put additional pressure on the Sewell's Lonning route.
- 6.39 Initially the Highway Authority requested a full contribution towards the additional improvements required to bring the rest of Sewell's Lonning up to the same standard as that alongside Speckled Wood. A viability assessment of the proposed development indicated that not all the funding for all infrastructure improvements would be able to be recognised from the scheme. The viability assessment took account of all development costs including the retention of one of the villas and considered what was available to deliver all planning obligations. Section 4 of this report is based on the Policy premise that all required affordable housing will be delivered on-site and therefore viability indicated that not all funding was available towards other infrastructure. Nevertheless, the improvements to Sewell's Lonning are necessary not only for this development but also other local schemes as part of St Cuthbert's Garden Village and existing development in this part of Carlisle. On that basis, as part of the integral transport infrastructure improvements for this part of Carlisle a bid has been made to the Local Economic Partnership (LEP) for funding towards these works. On the basis of potential LEP funding the Highway Authority has reduced its request for this S106 requirement to £155,000.
- 6.40 As part of the wider St Cuthbert's Garden Village development it is noted that there will be a significant number of infrastructure asks on all development in the area. Work continues on this matter to ensure that all infrastructure for

transport, education, community facilities, open space and any other infrastructure is provided in a co-ordinated manner across the whole Garden Village area. In terms of transport infrastructure the most significant scheme which requires a large amount of capital is the Carlisle Southern Link Road (CSLR). Members will be aware of announcements, reports to other committees and work on St Cuthbert's Garden Village that the CSLR scheme will receive significant funding from Government through Homes England with contributions from Cumbria County Council and Carlisle City Council. Whilst it is noted that Homes England is also the applicant for this site it is acting as a land agent who will pass the permission onto one or more developers on a commercial basis. In this context, any developer/land owner bringing forward a housing scheme in the Garden Village area will be required to make a contribution towards the CSLR. Given the high cost of such a significant transport scheme, the contribution has therefore been set at £2,000 per dwelling which would equate to £320,000 for the 160 dwellings.

- 6.41 As with all major planning applications a travel plan should be submitted to evaluate how the development will contribute to sustainable travel and this will be required to be monitored by the Highway Authority. On this basis an additional contribution of £6,600 is requested for travel plan monitoring.
- 6.42 The above measures can either by delivered by way of planning condition or, where monetary contributions are required, through an appropriately worded S106 agreement. The proposed development is therefore compliant with policy requirements for highway impacts.

## 6 Drainage and Flood Risk Issues

- 6.43 As this is an Outline application, there are no details of drainage required as part of the application. The application form states that surface water drainage will be by way of a sustainable drainage system and the foul drainage will be connected to the existing system. Although the site is not liable to flooding, due to the size of site, even though it is in Flood Risk Zone 1 (least probability of flooding) a Flood Risk Assessment is required as part of the application.
- 6.44 The Environment Agency does not consider there is a high risk and their standard advice regarding sustainable drainage methods applies. In addition, they have recently updated information on future climate change impacts and the additional capacity in the drainage systems to combat future increases. This is taken into account when the Lead Local Flood Authority assesses the detailed drainage capacities.
- 6.45 The County Council as Lead Local Flood Authority (LLFA) is satisfied that on the basis of information provided a suitable drainage system is capable of being provided. The surface water drainage scheme as outlined in the application proposes to discharge into the Wash Beck tributary and Durranhill tributary. This can be complied with through appropriate planning conditions.
- 6.46 United Utilities also consider that drainage conditions should be applied relating to a surface water drainage scheme, foul and surface water should

- drain on separate systems and a sustainable drainage management and maintenance plan should be put in place.
- 6.47 The overall drainage proposals are therefore acceptable subject to details in later applications. The LLFA also notes that the discharge into the Durranhill Beck tributary is to a point just upstream of a culverted section. In this instance a CCTV survey will be required to ensure it is in adequate working order. This type of situation has occurred in relation to two other recent developments, in different parts of Carlisle, which were able to prove that the drainage systems were satisfactory. In this instance it would be appropriate to add a further planning condition to ensure that these surveys are undertaken.

#### 7 Education

- 6.48 The County Council as Education Authority has considered the impact of the additional dwellings on currently provided education infrastructure and the demand for additional school places.
- 6.49 Given the location of the proposed development and predicted number of pupil places anticipated (albeit and outline application with no detailed dwelling design) it is envisaged that there will be sufficient local capacity not to require a contribution towards primary school capacity.
- 6.50 In relation to secondary school capacity the County Council requested a contribution of £564,742. Although this was the appropriate amount for the proposed 160 dwellings, a robust viability assessment process has been undertaken which revealed that not all planning obligations can be met without making the development unviable. The County Council's Planning Obligations Policy acknowledges that consideration can be given to reapportion or revise contributions having regard to the most important agreed priorities and outcomes for a locality and the requirement that the scheme suitably and sustainably integrates with local communities and services. On this basis the Education Authority is agreeable to a revised contribution of £218,400 in relation to secondary school education.
- 6.51 No contribution will be sought for school transport as there are safe walking routes within the statutory walking distances.

## 8 Open Space

6.52 The Design Code for this site has set out a number of parameters for the site's development. This includes areas of landscaping which provide amenity space for new occupiers as well as an extension of amenity space for those living in adjacent neighbourhoods. There is also a recognition that a play area will be required although its form is yet to be decided and can be used to accommodate more natural play. Policy GI4 requires a variety of spaces to be provided for different types of play. On this site there are competing demands for the type of space created and retaining the parkland setting of the original design concept is key to ensure the site respects its historic context. As a result the on-site amenity space will create a woodland walk on the western and northern boundaries of the site providing an informal

recreational opportunity for all residents and building on the site's parkland characteristics and providing a network of green routes and wildlife corridors.

- On this basis whilst large areas of amenity space will be provided there is no provision of formal sports provision. Reference is made to the nearby Creighton Rugby Club however as noted in some of the representations, this is a private facility and may not be accessible to all future residents. Recently a lot of investment has been made at the Edgehill Road community site providing for cycling as well as other sports uses with formal play facilities. These would be accessible for people in this area. Although these are within walking distance of this site the Policy would require that a contribution towards sports play is made.
- 6.54 Members will be aware that in this report a viability study has been undertaken to understand the maximum contributions that may be made from this development. This is discussed in the relevant sections of this report and although full affordable housing contributions are made, negotiations have reduced the contributions for highways and education. Given that informal amenity, play space and future maintenance will be provided on site a reduction in off-site contributions would be appropriate and as alternative provision is within walking distance this would be acceptable.

## 9 Impact On Trees and Biodiversity

- 6.55 Members will be aware that at the Development Control Committee of the 22nd November 2019 a review of the Tree Preservation Orders at the former Garlands hospital site has been undertaken. This resulted in new Tree Preservation Orders being made due to the fact that since the original Orders a number of trees have been removed (with consent), were diseased or died. This included the making of new Tree Preservation Order 308 which covers this proposed site.
- 6.56 As part of the Garlands hospital complex, it was considered that a parkland setting was important to the health and well being of the patients. The buildings were constructed in a parkland setting and many of the trees that are present today were planted at the time of the complex's formation.
- 6.57 Tree Preservation Orders are used as a planning tool to protect trees from unnecessary damage/removal and provide for future replacement to maintain the important tree cover and setting. The applicant has undertaken an arboricultural assessment of the site similar to the Council's review of its Tree Preservation Order. Both concluded that a small proportion of trees were no longer appropriate to protect, were in need of works for safety reasons and had a lifespan of less than 10 years. Both also concluded that the majority of trees have at least 20 years life and a good number will live for over 40 years.
- 6.58 At this stage only the access arrangements have been considered as part of this application and this will result in a number of trees to be removed for highway safety reasons. This includes some protected category B trees (more than 20 years).

- 6.59 When Members undertook a site visit as part of the review of the Tree Preservation Orders they observed the overall canopy of tree cover and noted that some of those trees were in amenity spaces as well as a number now within private property boundaries as the area was developed. Individual property owners are beginning to struggle with maintenance required for these mature trees and where they are over mature in smaller garden plots their replacement is difficult.
- 6.60 In planning this development it provides an opportunity through the Design Code not only to ensure that tree planting is designed into any scheme but where trees are to be removed or located close to development, greater consideration is given to succession planting to maintain the tree canopy in the longer term. The proposed scheme seeks to retain as many trees as possible and rather than leave them as incidental to the housing, they become an accessible feature providing an opportunity within the development through components such as the woodland walk.
- 6.61 The Design Code includes larger areas for amenity space which can include tree planting as part of the landscape proposals. This will ensure that not only is there replacement for any trees to be lost but consideration can be given to ensuring the parkland setting is maintained and trees can feature as part of the required green infrastructure increasing the biodiversity value of the site and recognising their valuable role in place-making.
- 6.62 Whist there will be an impact on existing protected trees, the planning of this development can ensure that there is a net increase in tree cover for this site and therefore the proposals are acceptable.

## 10 Archaeology and Built Heritage

- 6.63 The applicant has submitted an Archaeology and Built Heritage Statement as part of the application even though there are no Listed Buildings within the site and the site is not within a conservation area. This was prepared in recognition that although there are no Listed Buildings, there are old buildings on the site which may merit assessment. The evaluation of heritage assets has been undertaken in accordance with Historic England guidance.
- 6.64 In respect of archaeology, the applicant commissioned a geophysical survey of part of the proposed development site prior to the application being made. The results indicate that extensive remains of late prehistoric or Romano-British round houses, field systems, enclosures and trackways survive buried within the area of the survey. It is possible that remains of a similar nature survive within the areas of the site that were not subject to the survey. These archaeological assets will be disturbed by the construction of the proposed development and mitigation will be undertaken as part of ongoing archaeological work. Appropriate mitigation will be dependent on the nature of any finds and subsequent discussion with the County Council's Historic Environment Officer.
- 6.65 The County Council's Historic Environment Officer recommends that, in the

- event planning consent is granted, a scheme of archaeological investigation and recording of the site be undertaken in advance of development. This work would be commissioned and undertaken at the expense of the developer and can be secured through the inclusion of planning conditions.
- 6.66 With regards to built heritage, whilst there are no listed buildings on the site, the proposed scheme includes conversion of Cumberland House and the demolition of Westmorland House. The assessment of the properties has involved research at Cumbria archives including the building's relationship to other former hospital properties that formed part of the original Garlands complex along with surveys of the buildings in their current form.
- 6.67 By the early 1890s there was a need for new buildings to accommodate private patients, and discussions lead to an agreement to build three new structures on the site. The first building, known as Cumberland House, was opened in 1897. Westmorland House was built by 1900. The third building was never constructed although 'The Coppice', to the immediate north was built in the early C20, completing the trio. All buildings sat in extensive landscaped grounds for the benefit of patients. The Council's conservation officer recognises that the buildings clearly constitute undesignated heritage assets and considers that they would be strong candidates for Local Listing, however they are not listed at the time of this application being considered. The applicant's Heritage Statement recognises their quality and status as undesignated heritage assets.
- 6.68 While the proposal retains Cumberland House, the loss of the substantial, villa-like Westmorland House is of concern given its historic significance and the quality which it currently lends to the site. The proposed works will result in total loss of the asset.
- 6.69 The extensive and well-produced Heritage Statement accompanying the application acknowledges the aesthetic and historic values of both Cumberland House and Westmorland House. It notes the buildings as illustrating developments in care philosophy, placed away from the main complex as 'cottage care' and also as evidence of class segregation for paying inmates vs paupers. Regarding Cumberland House, it notes that the building's aesthetic value is drawn from its high-quality surviving internal features and its external appearance, with its quality stonework and surviving sash windows and overhanging eaves with decorative iron brackets contributing to this aesthetic value. The lack of significant alteration to the external facades is a key component of this. As an unlisted building it is noted as of 'low significance' according to the Historic England grading system.
- 6.70 Westmorland House is noted as one of a pair with Cumberland House and is again recognised as being a non-designated heritage asset. The report notes that in many respects the significance of Westmorland House lies in its demonstration of the same values as Cumberland House, drawing its significance primarily through its aesthetic and illustrative historical values, and to a lesser degree from its communal value.
- 6.71 The heritage statement regards the degree of internal alteration to

Westmorland House, the loss of its internal features, and the present condition of the building as factors determining the conclusion that its significance is lower than Cumberland House in respect of these alterations. The building is similarly assessed as being of local significance but regarded as of less value due to loss of internal features.

- 6.72 The redevelopment of the wider Garland's complex over the last 20 years went through a similar evaluation at the time and whilst the guidance of the NPPF may not have been available the importance of historic assets was still a significant factor in the evolution of the new housing development. At that time the buildings with the greatest architectural qualities and individual merit were converted but others were demolished and redeveloped. The resultant development with the remaining converted buildings still bears reference to the former hospital. The buildings subject of this application did not form part of the previous area for development and are only now part of the same assessment process as they are no longer required for the more modern hospital complex.
- 6.73 The Conservation Officer considers that both buildings, along with The Coppice, provide an aesthetic and historic ballast to the area which can be seen in the mixture of old and new elsewhere in the area, contribute strongly to a sense of place and to a successful development.
- 6.74 The 2010 Development Brief for this part of the site predates the NPPF which gives greater weight to undesignated heritage assets and the Historic Buildings Report for the Garlands site is not exhaustive in its assessment of the existing buildings. The Local Plan context has also changed with policies SP6, SP7 and importantly HE6 Locally Important Heritage Assets of relevance.
- 6.75 Policy HE6 states that "throughout Carlisle District there are a number of buildings and structures of historic and architectural significance that, whilst not statutorily protected, help create the locally distinctive character of the area. The Council recognises the positive contribution these structures make to streetscape and/or landscape and will therefore designate such assets through the Local List to strengthen the presumption in favour of their retention when considering development proposals". Para 9.19 states that "Across the District there can be pressure for redevelopment potentially resulting in the loss of unlisted structures that whilst not of national importance (and therefore not eligible for inclusion on the statutory register of listed buildings) may be of local heritage or townscape significance. This reflects that many of these structures make an important contribution to the streetscape and/or landscape of a particular area, or that they are of local historic or architectural interest".
- 6.76 Paragraph 197 of the NPPF refers to non-designated assets its states that "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"

- 6.77 It is clear that both local planning policy and the NPPF give weight to non-designated assets such as Westmorland House and Cumberland House.
- 6.78 The applicant has therefore undertaken an assessment of the historical significance of the buildings and found that internally there are now considerable differences between the two buildings. From considering the original layouts of the buildings they were designed differently as the internal features represented the societal differences between gender and Westmorland House had a simpler layout. That said, this has been further eroded by subsequent changes and adaptation of the building resulting in few internal features of quality. Policy HE6 seeks not only to retain locally important heritage assets but to able to maintain that quality. The applicant's assessment has resulted in the proposal to retain the better quality asset. This is based on the merits of the building but also on the prospect of being able to convert both buildings to a similar standard so that they remain as a pair of villas.
- 6.79 Where a building exists in relatively good order, and can be incorporated into a wider development scheme as Cumberland House is proposed to do, the Conservation Officer considers that there should be a revised layout which takes into account the value of Westmorland House and incorporates both villas creatively into the wider scheme. He continues that the lower quality of Westmorland House would give a freer rein to convert however if the two buildings are to function in the landscape as a pair the conversion should be of a comparable high quality.
- 6.80 Discussions have taken place with the applicant around the options to convert and retain the villas as part of the overall site's development. The applicant recognises the need to retain the historical character of the site however in evaluating the varied policy requirements and subsequent planning obligations it would not be possible to deliver everything without significantly affecting the viability of the site. Members will note that in considering the planning balance of the proposals, the proposed scheme already struggles to meet all planning obligation requirements and the additional costs for conversion of Westmorland House would add to this dichotomy.
- 6.81 On this basis it is acceptable that in accordance with Policy HE6 the loss will be permitted provided that the building is the subject of an appropriate survey, consideration is given to the provision of a replacement building of comparable quality which in this case would have to be sympathetic to the retained villa, and where possible, any special features (all be they limited) should be reused within the future development.
- 6.82 The County Council's Historic Environment Officer also recommends that, in the event consent is granted, Cumberland House and Westmorland House are recorded prior to conversion and demolition work commencing. This recording should be in accordance with Historic England advice in Understanding Historic Buildings A Guide to Good Recording Practice, 2016. This can be secured by planning condition.

#### 11 Other Matters

- 6.83 Whilst acknowledging that this is an Outline application and further details are required on the layout and appearance of houses there are nevertheless a number of matters which will need to be dealt with no matter how the development looks. These are matters such as air quality and designing out crime which will apply to future applications on this site.
- 6.84 With regards to air quality, although there are no Air Quality Management Areas in the immediate vicinity of the site, there are several in other parts of Carlisle and guidance states that measures should be taken to reduce any negative impact on Air Quality. Environmental Health has responded and advised that a condition should be imposed to ensure that the development is designed with the ability for people to utilise electric charging points providing a realistic alternative choice for vehicles. Consultation was undertaken in 2019 on potential changes to Building Control legislation however these have yet not filtered through to formal policy. It would be reasonable to put on a planning condition to ensure that each house has an accessible charging point when constructed to ensure this is achieved.
- 6.85 The Cumbria Police Crime Prevention Officer has provided observations that the application does seek to embrace measures relating to safety and security especially surveillance opportunities and overlooking and he seeks to ensure that this is carried through to the future layout in any reserved matters application. This advice has been passed on to the applicant in relation to work on future applications for this site.

#### Conclusion

- This application seeks to develop an area of land on the south-eastern fringe 6.86 of Carlisle. The principle of development is acceptable complying with Policies HO2 and SP3. This application in Outline form includes access at this stage and subject to planning conditions, the proposed access arrangements are acceptable. Through the use of planning conditions, matters relating to drainage, heritage, open space and trees as well as layout, appearance, scale and landscaping which are reserved for future applications can all be suitably provided on site. As part of the site is within St Cuthbert's Garden Village it is necessary to contribute towards the required infrastructure for the Garden Village as well as affordable housing, education and local highway improvements. After considering viability of this site and taking the planning balance of all issues into account the proposed application is recommended for approval subject to a S106 legal agreement a) the provision of 20% of the units as affordable (in accordance with the NPPF definition and City Council's SPD proportions);
  - b) a financial contribution of £218,400 to Cumbria County Council towards secondary education capacity;
  - c) a financial contribution of £2,000 per dwelling (i.e.up to £320,000) towards the Carlisle Southern Link Road;
  - d) a financial contribution of £155,000 towards the widening of Sewell's Lonning;

- e) a Travel Plan Monitoring fee of £6,600;
- f) the provision of an on-site play area;
- g) the maintenance of the formal and informal open space within the site by the developer;

Should the Legal Agreement not be completed, delegated authority be given to the Corporate Director of Economic Development to refuse the application.

# 7. Planning History

7.1 There is no direct planning application history for this site.

#### 8. Recommendation: Grant Subject to S106 Agreement

- 1. In case of any "Reserved Matter" application for approval shall be made not later than the expiration of 3 years beginning with the date of this permission, and the development shall be begun not later than whichever is the later of the following dates:
  - i) the expiration of 3 years from the date of the grant of this permission, or
  - ii) the expiration of 2 years from the final approval of the reserved matters, or, in the case of approval on different dates, the final approval of the last such matter to be approved.

**Reason:** In accordance with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended by The Planning and Compulsory Purchase Act 2004).

2. Before any work is commenced, details of the layout, scale, appearance and landscaping of the site (hereinafter called "reserved matters") shall be submitted to and approved by the local planning authority.

**Reason:** The application was submitted as an outline application in accordance with the provisions of Article 3 of the Town and Country Planning (General Development Management Procedure) Order 2015.

- 3. No construction shall take place until there has been submitted to and approved by the local planning authority:
  - i) a fully detailed layout plan of the proposed site showing the primary road structure comprising all new roads together with related realignments and junction alterations to existing roads; the proposed primary system of trunk foul and sewage water drainage; the disposition of those areas intended to be development for [employment] purposes and the locations and extent of areas intended to be subject of structural landscaping and/or landscape conservation measures.
  - ii) a programme of the proposed phasing and related phasing of the

- [reclamation] works;
- iii) a programme of the proposed phasing of the redevelopment and a related phasing plan based on the layout plan referred to item (i) above.
- iv) the proposed measures for the successful implementation of the development and subsequent future maintenance of the landscaped areas of the site.

Future development shall comply with the Design Code submitted with this application which establishes the aims, objectives and required parameters for development.

Reason:

The application was submitted as an outline application in accordance with the provisions of Article 3 of the Town and Country Planning (General Development Management Procedure) Order 2015.

- 4. The development shall be undertaken in strict accordance with the approved documents for this Outline Permission which comprise:
  - 1. the submitted planning application form;
  - 2. the Site Location Plan received 10 June 2019;
  - 3. the developable area and access parameter plan received 10 June 2019;
  - 4. the Cumwhinton Drive/Area B proposed access visibility splay received 9 September 2019;
  - 5. the Planning Statement received 10 June 2019;
  - 6. the Archaeology and Built Heritage Statement received 10 June 2019;
  - 7. the design and access statement received 10 June 2019;
  - 8. the Phase 1 Desk Study received 10 June 2019;
  - 9. the utilities assessment received 10 June 2019;
  - 10. the Transport Assessment received 10 June 2019;
  - 11. the framework travel plan received 10 June 2019;
  - 12. the flood risk assessment received 10 June 2019;
  - 13. the air quality assessment received 10 June 2019;
  - 14. the arboricultural impact assessment received 10 June 2019;
  - 15. the Preliminary Ecological Appraisal report received 9 September 2019:
  - 16. the bat Survey Report received 9 September 2019;
  - 17. the Breeding Bird Survey Report received 9 September 2019;
  - 18. the Design Code August 2019 received 9 September 2019;
  - 19. the consultation technical response dated 15 august 2019 received 9 September 2019;
  - 20. the Carleton Clinic greenfield Run-off Calculations received 9 September 2019;
  - 21. the Tree Protection Plan (Sheet 1 of 2 and Sheet 2 of 2) received 9 September 2019;
  - 22. the additional drainage information and drainage strategy plan received 17th October 2019:
  - 23. the additional highways information and visibility splay plans received 17th October 2019;

- 24. the crashmap data received 17th October 2019;
- 25. the Notice of Decision; and
- 26. any such variation as may subsequently be approved in writing by the Local Planning Authority.

**Reason:** To define the permission.

5. No construction shall take place until a programme showing the phasing of the development has been be submitted to and approved by the local planning authority and the development shall not proceed other than in accordance with the approved programme.

**Reason:** To secure in the public interest a satisfactorily correlated order of development in accord with Policy SP6 of the Carlisle District Local Plan 2015-2030.

6. No work associated with the construction of the development hereby approved shall be carried out before 07.30 hours on weekdays and Saturdays nor after 18.00 hours on weekdays and 13.00 hours on Saturdays (nor at any times on Sundays or Bank Holidays).

**Reason:** To prevent disturbance to nearby occupants in accordance with Policy CM5 of the Carlisle District Local Plan 2015-2030.

7. No development shall commence within the site until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.

This written scheme of investigation will include the following components:

- An archaeological evaluation;
- An archaeological recording programme the scope of which will be dependent upon the results of the evaluation.

**Reason:** To afford reasonable opportunity for an examination to be made to determine the existence of any remains of archaeological interest within the site and for the examination and recording of such remains.

8. Where significant archaeological remains are revealed by the programme of archaeological work, there shall be carried out within two years of the completion of that programme on site, or within such timescale as otherwise agreed in writing by the local planning authority: an archaeological post-excavation assessment and analysis, the preparation of a site archive ready for deposition at a store, the completion of an archive report, and the preparation and submission of a report of the results for publication in a suitable specialist journal.

**Reason:** To ensure that a permanent and accessible record by the public is made of the archaeological remains that have been disturbed by the development.

9. Prior to the carrying out of any conversion of the existing building known as Cumberland House, the building shall be recorded in accordance with a Level 3 Survey as described by Historic England's document Understanding Historic Buildings A Guide to Good Recording Practice, 2016. Within 2 months of the commencement of construction works a digital copy of the resultant Level 3 Survey report shall be furnished to the local planning authority.

**Reason:** To ensure that a permanent record is made of the buildings of

historical and architectural interest prior to their alteration and

demolition as part of the proposed development.

10. Prior to the carrying out of any demolition works to the existing building known as Westmorland House it shall be recorded in accordance with a Level 2 Survey as described by Historic England's document Understanding Historic Buildings A Guide to Good Recording Practice, 2016. Within 2 months of the commencement of construction works a digital copy of the resultant Level 2 Survey report shall be furnished to the local planning authority.

Reason: To ensure that a permanent record is made of the buildings of

historical and architectural interest prior to their alteration and

demolition as part of the proposed development.

11. Prior to the commencement of development, the recommendations provided by the 'Carleton Clinic, Phase 1 Desk Study', dated March 2019 report should be carried out. This must be conducted in accordance with DEFRA and the Environment Agency's Land Contamination: Risk Management (LCRM) based on 'Model Procedures for the Management of Land Contamination. CLR 11'.

**Reason:** To ensur

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other

offsite receptors.

12. No development other than that required to be carried out as part of an approved scheme of remediation shall be commenced until a detailed remediation scheme to bring the site to a condition suitable for the intended use (by removing unacceptable risks to human health, buildings and other property and the natural and historical environment) has been prepared. This is subject to the approval in writing of the local planning authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

#### Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

13. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the local planning authority. The local planning authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the local planning authority.

#### Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

14. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the local planning authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the local planning authority. Further guidance can be found on the Carlisle City Council website "Development of Potentially Contaminated Land and Sensitive End Uses – An Essential Guide For Developers."

Site investigations should follow the guidance in BS10175:2011 (or updated version) "Investigation of Potentially Contaminated Sites.- Code of Practice".

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the local planning authority.

#### Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

15. Prior to the commencement of development and for each phase of development, the applicant shall submit a Construction Management Plan

(CMP) (covering noise attenuation, dust suppression and white noise from reversing vehicles) for approval in writing by the local planning authority. The development shall then be undertaken in accordance with the details contained within the CMP.

**Reason:** In order to protect residential amenity in accordance with Policy SP6 of the Carlisle District Local Plan 2015-2030.

16. No construction shall commence until, a landscaping scheme has been submitted to and agreed with the local planning authority including details of trees and shrubs to be retained and proposed new planting. The scheme shall include the use of native species and shall also include a detailed survey of any existing trees and shrubs on the site and shall indicate plant species and size for new planting. The scheme shall then be implemented in accordance with the approved details.

**Reason:** To ensure that a satisfactory landscaping scheme in prepared in accordance with the objectives of Policies SP6 and Gl6 of the Carlisle District Local Plan 2015-2030.

17. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building or the completion of the development, whichever is the sooner, and maintained thereafter to the satisfaction of the Council; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the local planning authority gives written consent to any variation.

**Reason:** To ensure that a satisfactory landscaping scheme is implemented and that if fulfils the objectives of Policy SP6 of the Carlisle District Local Plan 2015-2030.

18. Prior to the occupation of any dwelling, an external or within garage 32Amp single phase electrical supply shall be installed to allow future occupiers to incorporate an individual electric car charging point for the property.

**Reason:** In accordance with Policy IP2 of the Carlisle District Local Plan 2015-2030.

19. The carriageway, footways, footpaths, cycleways etc shall be designed, constructed, drained and lit to a standard suitable for adoption and in this respect further details, including longitudinal/cross sections, shall be submitted to the Local Planning Authority for approval. No construction shall be commenced until a full specification has been approved for that phase. These details shall be in accordance with the standards laid down in the current Cumbria Design Guide. Any works so approved shall be constructed before the development is complete.

**Reason:** To ensure a minimum standard of construction in the interests

of highway safety. To support Policy IP2 of the Carlisle District Local Plan 2015-2030.

20. No development of each phase shall commence until adequate visibility splays for access roads at junctions with the county highway have been provided in line with the Cumbria Development Design Guide. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order) relating to permitted development, no structure, vehicle or object of any kind shall be erected, parked or placed and no trees, bushes or other plants shall be planted or be permitted to grown within the visibility splay which obstruct the visibility splays. The visibility splays shall be constructed before general development of the site commences so that construction traffic is safeguarded.

**Reason:** In the interests of highway safety. To support Policy IP2 of the Carlisle District Local Plan 2015-2030.

- 21. No development shall take place until such time as the following have been completed to the satisfaction of the Highway Authority:
  - A right turn lane added to the Cumwhinton Road / Cumwhinton Drive junction
  - A 2m wide footway along Cumwhinton Road linking the development site into the Harraby area to the North West

**Reason:** In the interests of highway safety and to support Policy IP2 of the Carlisle District Local Plan 2015-2030.

22. Within 6 months of the occupation of the first dwelling, the developer shall prepare and submit to the Local Planning Authority for their approval a Travel Plan which shall identify the measures that will be undertaken by the developer to encourage the achievement of a modal shift away from the use of private cars to visit the development to sustainable transport modes. The measures identified in the Travel Plan shall be implemented by the developer within 12 months of the development (or any part thereof) opening for business.

**Reason:** To aid in the delivery of sustainable transport objectives.

23. No dwellings shall be occupied for each phase of development until the estate road including footways and cycleways to serve such dwellings has been constructed in all respects to base course level and street lighting where it is to form part of the estate road has been provided and brought into full operational use for that phase of the development.

**Reason:** In the interests of highway safety To support Policy IP2 of the Carlisle District Local Plan 2015-2030.

24. Development shall not commence until a Construction Phase Traffic Management Plan has been submitted to and approved in writing by the local planning authority. The CTMP shall include details of:

- pre-construction road condition established by a detailed survey for accommodation works within the highways boundary conducted with a Highway Authority representative; with all post repairs carried out to the satisfaction of the Local Highway Authority at the applicant's expense;
- · details of proposed crossings of the highway verge;
- retained areas for vehicle parking, manoeuvering, loading and unloading for their specific purpose during the development;
- cleaning of site entrances and the adjacent public highway;
- details of proposed wheel washing facilities;
- the sheeting of all HGVs taking spoil to/from the site to prevent spillage or deposit of any materials on the highway;
- · construction vehicle routing;
- the management of junctions to and crossings of the public highway and other public rights of way/footway;
- surface water management details during the construction phase

#### Reason:

The carrying out of this development without the provision of these facilities during the construction work is likely to lead to inconvenience and danger to road users. To also ensure the construction phase does not increase flood or pollution risk.

25. Foul and surface water shall be drained on separate systems.

**Reason**: To secure proper drainage and to manage the risk of flooding and pollution.

26. Prior to the commencement of any development, a surface water drainage scheme, with evidence of an assessment of the site conditions (inclusive of how the scheme shall be managed after completion) shall be submitted to and approved in writing by the Local Planning Authority. The drainage scheme submitted for approval shall also be in accordance with the principles set out in the Flood Risk Assessment dated March 2019 and additional information dated 17th October 2019 proposing surface water discharging to Wash Beck tributary and Durranhill tributarty unless otherwise approved in writing by the Local Planning Authority. The development shall be completed, maintained and managed in accordance with the approved details.

#### Reason:

To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG and in accordance with Policy CC5 of the Carlisle District Local Plan 2015-2030.

27. Prior to the commencement of any development, a condition and capacity survey of the culverted watercourse on the Durranhill Beck tributary downstream of the surface water discharge point shall be provided to the Local Planning Authority.

**Reason:** To promote sustainable development, secure proper drainage

and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.

28. No clearance of or damage to hedgerows shall take place during the bird breeding season from 1st March to 31st August unless agreed in writing beforehand by the Local Planning Authority.

**Reason:** To protect features of recognised nature conservation

importance, in accordance with Policy GI3 of the Carlisle

District Local Plan 2015-2030.

29. Details of the relative heights of the existing and proposed ground levels and the height of the proposed finished floor levels of the dwellings and garages shall be submitted to and approved in writing by the Local Planning Authority before any construction works begin.

**Reason:** In order that the approved development does not have an

adverse impact on the living conditions of the occupiers of any neighbouring properties in accordance with Policy SP6 of the

Carlisle District Local Plan 215-2030.

30. As part of the development hereby approved, adequate infrastructure shall be installed to enable telephone services, broadband, electricity services and television services to be connected to the premises within the application site and shall be completed prior to the occupation of the dwelling.

**Reason:** To maintain the visual character of the locality in accord with

Policy IP4 of the Carlisle District Local Plan 2015-2030.











