SCHEDULE A: Applications with Recommendation

		21/0111
Item No: 08	Date of Committee:	14/01/2022
Appn Ref No: 21/0111	Applicant: Eden Golf Course	Parish: Stanwix Rural
	Agent: Summit Town Planning	Ward: Stanwix & Houghton
Location: Eden Golf Club, Crosby on Eden, Carlisle, CA6 4RA		
Proposal: Change Of Use Of Part Of Golf Course To Allow For Stationing Of Up To 100 Caravans		
Date of Receipt: 24/02/2021	Statutory Expiry Date 23/04/2021	26 Week Determination

REPORT

Case Officer: Christopher Hardman

1. Recommendation

1.1 It is recommended that this application is approved with conditions.

2. Main Issues

- 2.1 Principle of development
- 2.2 Impact of the proposal on landscape character
- 2.3 Whether the scale and design of the proposal is acceptable
- 2.4 Impact of the proposal on the living conditions of the occupiers of neighbouring properties
- 2.5 Proposed drainage methods and flood risk
- 2.6 Impact of the proposal on highway safety
- 2.7 Impact of the proposal on biodiversity
- 2.8 Impact on archaeology
- 2.9 Other matters

3. Application Details

The Site

3.1 The site is located immediately adjacent to Eden Golf Course at the north

east corner of the site. Access is gained from the A689 and then via the U1811 which links to Newby East and back to the A689 or through Corby Hill to the A69.

Background

3.2 The site has a planning history of a golf course along with its associated structures of the club house and greens keeping equipment/storage. In addition permission was granted for the Garden of Eden marquee which is north of the club house and south west of the proposed site.

The Proposal

3.3 The application seeks full planning permission for the change of use of part of the golf course for the stationing of up to 100 caravans. The definition of a caravan is discussed later in this report. The application is accompanied by a location plan, a general arrangement plan of the layout, planning statement, design and access statement, landscape and visual impact assessment, landscaping scheme, preliminary environmental assessment, drainage strategy, flood risk assessment, transport statement, archaeological assessment and details of the proposed lodges.

4. Summary of Representations

4.1 This application has been advertised by the direct notification of thirteen neighbouring properties and the posting of a site notice. In response, five representations of objection and two of comment have been received. The objections raise the following points:

The lane running down from High Crosby towards the golf course is a narrow lane (only 1 vehicle width for the most part) with a number of residential properties on it. The lane is already used as a rat run by people looking to access the golf club or go to Little Corby/Warwick Bridge. This frequently includes heavy goods traffic. Not only is passing not possible verges are regularly driven over. There is a sign in the grounds of the former Crosby Lodge Hotel directing traffic for the golf course along the lane rather than into the edge of the village and along the main road. If caravans are to use the lane to access and egress the site the issues with the lane will be exacerbated.

This application has a misleading title. The proposed 2 and 3 bedroom dwellings bear little resemblance to the common vision of a caravan. The planned 100 lodges are in fact fully equipped homes with water, electricity, central heating, kitchens, bathrooms and ensuite facilities. With up to 400 occupants over 12 months per year this will at least double the population of Crosby-on-Eden and therefore the consequential infrastructure required. I hope the providers of this infrastructure can assure us that this can be accommodated. In particular I have concerns over sewage, refuse collection, recycling, transport, water and electricity supplies. I have concerns about the proposed use of the Gill Gutter for the surface and dirty water. I have fields lower down from the development and since the development of the airport there has been a significant increase in flow and flooding of my fields. So I really don't want any increase in flow from the development unless it is seriously controlled. I also think the traffic flow through the village of Newby East will increase significantly.

The current users of this golf club access it on a totally unsuitable road, via either a narrow bridge at Little Corby, through the hamlet of Newby East from the A69 or via the village of Crosby-On-Eden through a 20 mph zone. Cars frequently speed. These roads are used by locals, children, cyclists and horse riders. Visitors to Eden Golf Club, often take short cuts through the road past Crosby Grange, again, driving at excess speeds. The sewage disposal for the holiday homes can't safely be removed - it will need to be mains installed the noise, mess would affect the local farmers, residents and wildlife. The current club house social events often run later than their permitted times and can be heard from the road into the village. The application is for nearly as many units as the entire village. Each unit would have multiple occupants and cars. The golf course is a wildlife haven but would be busy 24/7. There would light and noise pollution. The site itself is not fenced adequately and has multiple ponds so the lodges would have to be secure from the course itself. There is also the question of noise and light pollution from the units. In addition to this, the fabric construction of the lodges and risk of fire from the units including bbg's. The golf course is a beautiful enhancement to the area and so, trees and bushes need to be protected. The access roads flood and the top of the course is very wet - all this would be put under more strain.

There are inconsistencies in the Planning Application/Supporting Documentation – particularly whether the application is for caravans, static caravans or lodges.

Excessive increase in traffic coming through Low Crosby (and Newby East) and the use of the U1181 as the main access route (where there is an alternative route available directly to the A689 which would avoid Low Crosby and Newby East).

"Access is gained from the A689 and then an unnamed road to Newby East....." No mention is made, that all the traffic coming from the M6 direction, will have to come directly through the nearby village of Low Crosby, which was bypassed by a new section of the A689 in 1993 to reduce the traffic coming through it. The village has a pub, church, parish hall, primary school and a nursery and at various times the traffic can be very busy. No mention is made that the road through the village is part of the Hadrian's Wall Walk and the U1181 from the A689 junction, through the village and past the Golf Course entrance, is part of the National Cycle Route 72. The "unnamed road which links (*from the village*) to Newby East", is in fact the U1181. This road is very twisty in parts and has no public footpath. People playing on the golf course have to cross over this road 4 times when playing the full 18 holes.

The road was badly flooded following Storm Desmond in December 2015 and was closed for approx. 4 weeks and successive Storms Ciara and Dennis

over 2 weekends in February 2020 caused flooding. On this occasion, the flood waters reached approx. 1.2m high on parts of this road.

No mention of the access to the site after the A689; i.e. it ignores that the route comes through the village of Low Crosby and continues along the U1181.

There are bus stops on the A689, but there is no bus service. Stating that this is "temporarily suspended" is very optimistic.

It does not mention that the pub at Warwick on Eden is on the other side of the River Eden (from the site) and is accessed via the U1181, then over a hump back bridge on the C1013 (Little Corby Road) with traffic lights and then through the village of Little Corby.

The U1181 is also temporary closed on an annual basis for the Carlisle Half Marathon.

Refers to a secondary direct access to the bus stop on the A689.

The rural bus service, together with the Hadrian's Wall bus service, have both been unavailable for several years and this had nothing to do with the current Covid 19.

Also, there is no public footpath along the U1181 from the golf course to the village of Low Crosby.

This is a partly un-surfaced access in the most part and the bus service is no longer provided.

The additional traffic caused by 100 units, visitors and staff will significantly increase the use of the U1181, together with the golf club users, existing traffic, pedestrians and cyclists.

A more obvious access route would be via the northern (partly unmade) road/track from the proposed site with direct access to the A689 (at Crosby Moor) and the adjacent footpaths and bus stops on the A689.

This route shows up on Westwood Landscape's Figure 2 (annotated with photo locations 21 and 22) and Figure 5. If upgraded, this alternative route would avoid traffic coming through Low Crosby (from the west) and Newby East (from the east).

The other supporting drawing (by Zebra Landscape Architects) entitled "Lodge Development", does not show any road linking the proposed development site to the existing golf club access road. Neither does Figure 8 - in Westwood Landscape's Outline Landscape and Visual Impact Appraisal document.

The village of Low Crosby does not have a shop and the nearest shop (to the west) is either in Houghton or Carlisle (for larger stores) or in Brampton (to the east) or Warwick Bridge (to the south) - all would involve car journeys. The application states that "there are opportunities for public transport access from the adjacent village....." This is just not true, there has never been any public transport from the village to the golf course. The village itself is not served by public transport to or from Carlisle or Brampton.

100 caravans = 100 car parking spaces – no mention of visitor provision.

Unsuitable foul water drainage proposals states the preferred Building Regulations and Environmental Agency options (both connecting into the existing sewer system).

However, the document does not clearly state if the intension is or is not to connect the foul drainage into the existing system, but Section 13 of the Planning Application has been completed as "mains sewer" and "connected

to the existing drainage system".

This has not been picked up by United Utilities in their comments, which state "United Utilities have no wastewater assets in the area".

We think this is in reference to the immediate area of the site – not in the village of Low Crosby.

The Environment Agency's comment states that a decision on the disposal of foul sewerage has not yet been agreed or made (despite what has been completed in Section 13 of the Application Form).

They also suggest that the applicant should enter into discussions with them as soon as possible.

The document states that the nearest potential foul sewer connection is at Low Crosby School.

The village of Low Crosby and the surrounding areas have been badly affected by flooding in recent years (particularly Storm Desmond in Dec 2015 and Storms Ciara and Dennis in Feb 2020).

As well as the surface water problems caused by these storms, the village (which has an old combined drainage system) has in the past, had considerable problems caused by the combined drainage system. To add the foul sewerage produced by a potential of 450 additional people to the village system (which will probably double the usage of the village's existing drainage system) could be disastrous.

No arrangements made for the separate storage and collection of recyclable waste.

4.2 Following a further period of consultation the following objections were received from those who objected previously:

It is vital there is a public meeting about this before any decision is made. It is of major concern that more residents haven't made comments. This is probably due to many not being comfortable with on-line and not sure that they can easily access the planning office like before Covid.

The residents who raise the issue of the unadopted road is crucial. These 5 properties could be affected vastly by sewage, drainage and works plus extra traffic.

The golf club coffee sign at the top of the lane by High Crosby Farm. This, directs traffic down a totally unsafe road used by walkers (both local and Hadrian's Wall) and horses, farm vehicles ...speeds are often excessive and some drivers are verbal in their view that residents shouldn't be trying to maintain verges etc.

The other access roads are totally overused and golfers stroll straight out - at 4 points, without looking.

The question of sewage, drainage, light pollution, noise and fire risks remains.

Residents are already being warned off the land - will the public paths be altered, blocked or made impassable by building materials.?

The query raised of the actual building quality is very important. As stated,100 lodges means at least 400 occupants - if used by Corporate groups.

100 also can mean multiple cars - they're not going to bus them in.

The most crucial consideration is regarding foul drainage. The applicants solution is simply presented as "connect to mains sewer". I assume this connection will be at Low Crosby.

Before these plans can be approved there needs to be assurance from United Utilities that their system has the capacity to cope with the sewage from an additional 100 residential units (400-500

people), including at a time of flooding when the system appears to struggle with the existing load.

Average occupancy rates cannot be used for sewage calculations as the system must be able to cope under maximum loading.

The Caravan Act specifies maximum dimensions of a caravan. The maximum dimensions allowed under the act are:

Depth - External 6.8metres (22 feet 3 3/4 inches)

Length - External 20 metres (65 feet 7 1/2 inches)

Ceiling Height - Internal 3.05 metres (10 feet 0 inches)

The Act also specifies that the structure (caravan or mobile home) can be transported or removed from the site. This doesn't mean they must have wheels - the act specifies that transported just means that a structure is capable of being removed and transported by road.

Based upon the plans and illustrative photographs submitted in the application it appears that the proposed development will constitute "caravans" pushing the maximum size, only transportable on a very large lorry.

The proposed development constitutes what are widely known as lodges, but technically and legally can be termed caravans. Recent developments of these lodge/caravans usually include most of the features expected in a modern house, including fully fitted kitchens, central heating, ensuite bathrooms, electrical points and double glazing.

Technically this application may be considered a change of use but in practice it is equivalent to a development of an estate of 100 new houses.

Although there seems to be a lot of information/detail in the Additional Documentation, this doesn't answer any of the above points or the points raised by Stanwix Rural Parish Council, particularly concerning the size of the development (in relation to the size of Low Crosby), no public transport available and no public footpaths from Low Crosby to the golf club, additional traffic use through Low Crosby and on the U1181, the misleading comparison of the golf course site to the Butlins site in Bognor Regis (which is a totally different business model) and the disastrous effect the connection of the development's foul drainage would have on the already problematic combined drainage system in Low Crosby.

4.3 The two comments raise the following points:

I would like to know about the unadopted road with no safe pathway where 5 houses are located 1/2 mile away off the A689 which haven't been marked in any of your documentation that they exist and I'm presuming that this won't be used as a secondary access road due to the close proximity to the homes.

As one of Eden Golf Courses neighbours and we have also suffered with storms Desmond, Ciara, and Dennis. In view of almost no concrete action by the City Council, the county council, or the EA over the last six years we understand they need to develop and diversify their business to secure its survival. We have no objection in principle to this. However, there are several details in the proposal we feel are incomplete or unresolved and which need to be resolved before permission is granted.

The title of the application refers to "caravans", in supporting documents the units are referred to as lodges". Clarification and consistency are surely required.

Surface Water Drainage - the supporting documents state "There will be a significant increase in the total hard area of the site as a result of this proposal; that "flow generated offsite ...will be routed away from the site in a westerly direction"; that "the flow direction of overland flow in saturated conditions would run to the west due to the fall of the site" (i.e. not in to Gill Gutter to the south east) ; and "all...trial holes did not have suitable percolation properties to allow for the infiltration of the site's surface water. This increased volume and/or flow will therefore drain through the ponds and ditches that run adjacent to our properties southern edge, and to the Eden via a gravity flap. When the Eden is high (with increasing frequency) we already see this flow gravity locked, the ditch fill and water encroach upon our land. It is imperative that this proposal includes sufficient increased temporary water storage between the site and the U1181 to ensure our property does not suffer increased, avoidable flooding.

Foul Water Drainage - the "application" states Foul will be disposed of via connection to the main sewer (at Low Crosby, across land mainly owned by the applicant). However Low Crosby has a combined system that is known to be near capacity, and this would have to be addressed. As with surface water Gill Gutter may be closer but is at the top of the site. Unless pumped, discharge to ground or watercourse would drain westerly. This is clearly unacceptable for planning due to the volume, EA Nitrate Vulnerable Zone, the habitat of protected species (Gt Crested Newt) in the ditches and ponds to the west. It is also unacceptable to us as it would add to the surface flow and contaminated water would encroach on our property at times when the outfall is gravity locked.

Road Traffic - In addition to extra foot and cycle traffic the proposal is stated to create an additional 250 traffic movements, daily, on the U1181 road. Despite the lack of records accidents occur annually on this road with excessive speed in summer and poor road conditions in winter being known to all locals as the cause. Due to Google routing most of this will pass our property access. Our access is badly sighted for oncoming traffic in both directions, most of the other properties accessed from the U1181 have similarly part or fully concealed access with poor sight lines. Visitors have no indication of these exits; locals know these exits exist but still travel too fast. In addition to additional noise, gas, and particulate pollution the proposal will give current residents 250 more daily chances to be struck by oncoming traffic unless some mitigation is enacted. Suggest the following mitigation, 40mph restriction from Holme Ends to the junction to High Crosby, improved signage of concealed entrances, appropriately sited traffic mirrors for all affected properties.

Habitat / Environment - with Gt Crested Newt presence suspected, and Smooth and Palmate newts recorded in the surrounding area, providing the foul water solution is addressed there is every possibility this development could prove to be an asset for local biodiversity and habitat connectivity. How chuffed would the visitors be to see a Kingfisher rather than an algae filled lifeless pond. Need to ensure the use of native species.

5. Summary of Consultation Responses

Historic England - North West Office: - Historic England has no objection to the application on heritage grounds providing that the issues and safeguards outlined in our advice are addressed in order for the application to meet the requirements of paragraph 189 of the NPPF. We would advise that if planning permission is granted an appropriate level of archaeological excavation and recording should be secured by an appropriate condition(s) as advised by the local authority archaeology and conservation service.

Cumbria County Council: -

Highways response:

The development under consideration seeks approval for the siting of up to 100 holiday static caravans on land adjacent to Eden Golf Course, Crosby-on-Eden. It is proposed that the development will be accessed from the existing internal access road and main site entrance off the U1181. Following on from the previous response to this application the applicant has submitted a revised Transport Statement which seeks to address the issues raised by the Highways Authority.

The applicant has confirmed that the proposed development is to have a single access point onto the U1181 and not a secondary access onto the A689. Further to this a speed survey was undertaken in May 2021 to determine vehicular speeds on the U1181 and to inform the visibility splays associated with the access. The results of the speed survey determine that the 85th percentile speeds are 45mph in both directions. Therefore the visibility splay requirements for the access junction onto the U1181 is 2.4m x 160m in both directions. It is noted within the revised Transport Statement that a visibility splay plan has been produced which illustrates that visibility splays of 2.4m x 160m are achievable; however the boundary hedges and fences under the ownership of the applicant and within the visibility splay are to be reduced to a height of 1.05m so as not to impede the splays. The revised Transport Statement submitted included a traffic count for the current vehicular use for the golf course. The traffic count established that over a week that there are 177 vehicles movements in each direction over a 24 hour period. The applicant has then gone on to assess the cumulative impact of the proposed development with the existing use of the golf course. TRICS analysis has been used to calculate the trips associated with the proposed usage and this has demonstrated that during the AM peak there is to be 32 vehicular movements in and out and at the PM peak 38 movements. The daily total is 306 vehicles arriving and 296 departing, which is an increase of 129 arriving and 120 departing as a result of the holiday lodges. The applicant has considered that the increase in vehicular usage of the access is not going to have a material / severe impact on the local highway network or safety of the U1181. The Highways Authority have considered the results of the Transport Statement and have determined that the increase in use of the access onto the U1181 will have a negligible impact on the safety

of the U1181. The Transport Statement and Planning Statement put emphasis on the point that a national cycle route and PROW runs past / though the site. The Highways Authority noted within the previous response to this application that the additional traffic on the U1181 will affect the safe working of the Cycle Route. Within the revised Transport Statement submitted the applicant has assessed the affect of the site on the cycle route along the U1181. A cycle survey was undertaken in May 2021 for 1 week which determined that the average week day total over a 24 hour period was 22 cyclists 2 way movements. The Transport Statement concludes that the maximum number of cyclists passing the golf course access was 10 between 1pm and 2pm on a Saturday and therefore that the proposed additional usage would have a minimal impact on cyclists. The Highways Authority have considered this view and agree that the proposed holiday lodges will have a minimal impact on cyclists using the U1181.

Therefore to conclude, the Highways Authority has no objections with regards to the approval of planning permission subject to the imposition of conditions.

LLFA response:

The applicant has detailed within the drainage strategy submitted as part of this application that the surface water drainage on site is to be discharged using SuDS methods where possible. Percolation testing was undertaken by the applicant in June 2021 through 4 trial holes on site which determined that the site is suitable for infiltration. In line with the hierarchy of drainage options, as stated within the Cumbria Development Design Guide, this is to be the preferred option for the discharge of surface water through suitably sized soakaways. It is the preferred option of the applicant that the surface water discharge from the lodges is to be to the ground via a soakaway strip with an overflow into a detention basin which flows into the ordinary watercourse at a restricted rate. The LLFA have no objections to this proposal with the discharge for the overall site being limited to the greenfield runoff rate (QBar) of 2.99I/s. It is noted within the detailed calculations submitted as part of this application that the maximum discharge from a 1 in 100 year plus 40% to account for climate change storm event is to be controlled via a hydro brake at 1.2l/s (which is below the greenfield runoff rate of 2.99l/s). Further to this the applicant has demonstrated that the detention basin and infiltration strips have sufficient storage to accommodate a 1 in 100 year plus 40% to account for climate change storm event. This is acceptable to the LLFA. However, it is noted within the revised drainage strategy submitted that no information has been provided regarding the treatment of surface water prior to discharge. As such the applicant is also to demonstrate that the drainage proposals incorporate sufficient treatment of the surface water prior to discharge for a residential development in accordance with page 568 of the SuDS manual (table 26.2). The LLFA find it acceptable that the information regarding treatment of surface water can be provided at a later stage of the planning process and secured through the use of the planning conditions. Therefore to conclude the LLFA have no objections with regards to the approval of planning permission subject to the imposition of conditions.

Natural England: -

In order to ensure no impact on the site integrity of the River Eden SAC or impacts on the River Eden & Tributaries SSSI a finalised drainage report is

required due to the uncertainties of where surface water and foul water is to be disposed at the operational phase of the development. As advised by the Environment Agency further advice should be sort from them with regards to the foul water disposal from the site.

At the construction phase the mitigation measures detailed in section 7.1 of the Preliminary Ecological Appraisal (PEA) regarding pollution prevention and in 7.7 for biosecurity should be secured through planning condition through the provision of a CEMP. Further survey for bats and GCN is also required as advised within the PEA.

Environment Agency: -

According to the Drainage Strategy dated 18 January 2021 produced by Tweddell & Slater a decision on the disposal of foul sewerage has not yet been agreed or made.

Government guidance contained within the National Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

- 1. Connection to the public sewer
- 2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
- 3. Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2010 any discharge of sewage or trade effluent made to either surface water or groundwater will need a Permit issued by the Environment Agency, in addition to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

The granting of planning permission does not guarantee the granting of an Environmental Permit.

Stanwix Rural Parish Council: -

In summary the Parish Council holds the view that the proposed development is (full copy is contained for Members in the third party correspondence): Significantly out of scale with its location;

Would have a marked adverse impact upon the environmental assets within which it would be situated;

Would have a marked adverse impact upon the River Eden and Tributaries SSSI/SAC;

Would have an adverse impact on the drainage capacity of Low Crosby if a mains sewer connection is made;

If such a connection is not made it would require the daily discharge to the SSSI/SAC of 75m3 of treated waste;

It would be entirely dependent upon the private motor car;

There are no viable alternative modes of travel;

There is no safe and convenient pedestrian access to the site;

The access is susceptible to flooding and the alternative access/egress is unsuitable for emergency use;

The proposal is not compatible with the principles of sustainable

development;

The application documentation is lacking in detail;

In view of the above brief points and their preceding paragraphs the Parish Council considers that the proposal to be entirely contrary to local and national planning policy and that consent must therefore be refused.

Cumbria County Council - (Archaeological Services): -

Acting on pre-application advice, the applicant has helpfully commissioned an archaeological geophysical survey of the site, although I cannot find the survey report in the application documents. The results of the survey show anomalies indicative of a Romano-British enclosure surviving on the site. The enclosure may be a defended farmstead or may have protected livestock. Other anomalies of interest were also identified in the survey including a possible building of unknown origin and early field systems. It is therefore considered that the construction of the proposed development will disturb buried archaeological assets. Consequently, I recommend that an archaeological evaluation and, where necessary, a scheme of archaeological recording of the site be undertaken in advance of development and advise that this work should be commissioned and undertaken at the expense of the developer. I consider that this programme of work can be secured through the inclusion of two conditions in any planning consent that may be granted.

United Utilities: -

<u>Drainage -</u> United Utilities have no wastewater assets in the area. <u>Water supply -</u> It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed development. We recommend the developer contacts United Utilities for advice on identifying the exact location of the water main.

Off-site main laying may be required and re enforcement required due to elevation.

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project which should be accounted for in the project timeline for design and construction.

It is the applicant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.

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 an application for planning permission is determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 6.2 The relevant planning policies against which the application is required to be assessed are the National Planning Policy Framework (NPPF), the Planning

Practice Guidance (PPG), and Policies SP2, SP6, EC9, EC10, EC11, HE1, IP2, IP6, CC5, CM5, GI1, GI3 and GI6 of the Carlisle District Local Plan 2015-2030. The City Council's Supplementary Planning Document 'Trees and Development' is also material planning consideration. The Cumbria Landscape Character Guidance and Toolkit (March 2001) is a further material consideration.

6.3 The proposal raises the following planning issues:

1. Principle Of Development Is Acceptable

- 6.4 Paragraph 7 of the NPPF outlines that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraphs 8 and 9 explain that achieving sustainable development means that the planning system has three overarching objectives: economic, social and environmental. All of which are interdependent and need to be pursed in mutually supportive ways. Economic growth can secure higher social and environmental standards with planning decisions playing an active role in guiding development towards solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 6.5 To support a prosperous rural economy, paragraph 83 outlines that planning policies and decisions should enable: "a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship".
- 6.6 Paragraph 84 recognises that: "sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist".
- 6.7 The aforementioned paragraphs of the NPPF are reiterated in Policies EC9, EC10 and EC11 of the local plan all of which seek to support sustainable rural tourism and leisure developments where they respect the character of the countryside and where identified needs are not met by existing facilities in rural service centres. Specifically in relation to caravan, camping and chalet sites, Policy EC10 of the local plan highlights that proposals for the development of caravan sites will be supported subject to compliance with the

criteria identified within the policy.

- 6.8 The application seeks permission for the change of use of land to provide up to 100 static caravans at Eden Golf Course. The existing site currently has permission for a golf course and the siting of the Marquis (Garden of Eden) function suite and it is intended that the proposed caravans will offer complimentary accommodation to the golf complex. The part of the site subject of the application is not currently in use as part of the layout of golf greens on the site.
- 6.9 The proposal would be an expansion of an existing sustainable rural tourism business which is well established in the area and would ensure the continued viability of the enterprise by offering a wider range of facilities; the application site is well related to the existing golf course and existing woodland with additional landscaping proposed to minimise any potential visual impact; adequate access/parking provision can be achieved although this is discussed in later paragraphs; and the application site is not located within a flood risk area. Accordingly, the proposal accords with the objectives of the NPPF and relevant local plan policies.
 - 2. Impact Of Proposal On Landscape Character
- 6.10 The Cumbria Landscape Character Guidance and Toolkit (March 2001) (CLCGT) describes the character of different landscape types across the county and provides guidance to help maintain their distinctiveness. The CLCGT identifies that the application site falls within the Cumbria Landscape Character Sub-Type 5b "Low Farmland". The toolkit advises that key characteristics of this landscape are: undulating and rolling topography; intensely farmed agricultural pasture; hedges, hedgerow trees; and fences bound fields and criss cross up and over the rolling landscape.
- 6.11 In recognising that the landscape is undulating and relies on hedgerows and trees the siting has been intentionally chosen to be set against the natural background of the woodland which rises away from the proposed caravans. It is also intended to supplement the existing landscaping with additional hedgerow and tree planting which would reflect the existing landscape character. This would be in the form of a tree belt around the site as well as a central open area with tree planting and a line of trees along a former hedgerow alignment. This would help to break up the scale of the development and the siting by the woodland would draw the viewers eye away from the caravans when viewed from the surrounding road network as the screening within the site matures. Whilst the scale of the proposal of up to 100 caravans is large the visual impact is reduced by careful siting within the golf course setting.
- 6.12 As part of the application a Landscape and Visual Impact Assessment (LVIA) was undertaken to assess the potential impacts on the landscape. It is acknowledged that there will be some change to the landscape as a result of the proposal however the LVIA notes that "the proposed development would comply with guidelines to maintain and enhance the landscape character of the Low Farmland sub -type. Native deciduous trees would be planted as

feature trees within existing hedgerows and a mix of native and ornamental varieties in tree groups throughout the proposed development to create a natural setting. New mixed native species hawthorn dominant hedges will enhance the low level screening to the north and east boundaries and existing hedges will be improved." These measures seek to enhance the landscape in accordance with the natural landscape character of the area. It will have some impact on landscape character as the development consists of man-made structures however the proposal seeks to minimise this where possible to reduce the impact on the character of the area by a large planting scheme to increase the woodland setting of the proposed development.

- 6.13 It would be appropriate to condition the landscaping proposals to ensure that this setting and enhancement of the landscape is carried out to its full effect.
 - 3. Whether The Scale and Design Of The Proposal Is Acceptable
- 6.14 Policies in the local plan and the NPPF support the expansion of a sustainable rural land based business and a golf course use is one which occupies a large area of rural land. On first acknowledging the description of the application the proposal for up to 100 caravans would appear a significant number of units where none currently exist. It is therefore important to consider the scale of the land based business and the extent of land which is seeking to change use to accommodate the caravans. The proposal seeks the ultimate number of units (up to 100) as the site is tested in the market as it develops and therefore the potential for 100 caravans needs to be considered as part of this application. Holidays associated with golf courses as people tour around the UK and abroad to experience a range of courses are known and there is a market for this type of facility however this is a niche market and the scale of this development would have to tap into other holiday provision hence the proposal seeks a medium to high-end caravan experience which is limited in this part of Cumbria. The proposed scale of development will therefore cater for the niche market as well as provide a more sustainable base for the existing facilities. The scale is therefore considered to be appropriate for this type of facility.
- 6.15 The proposed layout is around a central spine road to enable groupings of caravans which provide visual interest rather than uniformity. In order to ensure that the scale is not overwhelming or has a significant impact, enhancement of the natural landscape will help to visually break up the scale of the proposal and respect its natural setting.
- 6.16 It is also important to note that the proposal includes information relating to what would more commonly appear as holiday lodges however in planning terms these will effectively be caravans which conform to the Caravan Licensing regulations but will be wooden clad to give the appearance of a lodge. They remain mobile albeit on a permanent siting on the site to an approved layout. For planning purposes caravans are defined as "any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted," and therefore as long as the lodges can be transported they fall

within the definition of a caravan. Confusion can arise as lodges are commonly larger than static caravans however these will comply with the regulated sizes and separation distances under a Caravan Licence. The caravans are to be clad with wood which will soften their external appearance and they remain single storey at different levels throughout the site creating variety. Each unit would have parking adjacent so that there are no large areas of hard surfacing other than the access road which would utilise gravel to assist with drainage.

- 6.17 To ensure that these remain as holiday use it would be appropriate to add a planning condition to restrict permanent residential occupancy. It is however intended that they would be occupied throughout the year and caravan sites no longer have closed seasons. As this is a permanent siting their impact will be all year round.
- 6.18 The scale and design of the proposal is acceptable and in overall terms the proposal accords with the objectives of Policy EC10 of the local plan.
 - 4. Impact Of The Proposal On The Living Conditions Of Neighbouring Residents
- 6.19 The nearest residential properties are those at Crosbymoor which are along the northern track which leads to the site. The main concern for these residents is particularly in relation to access as there is currently an access road to the A689 however it is not intended to use this as the main vehicular access which is via the golf course entrance. All holiday traffic will be directed to the golf club house entrance. It would also be appropriate to ensure that construction traffic and future deliveries are also directed to the club house access road and the owners would need to ensure that the use of sat nav does not direct people to take short cuts along the private access road. It is often the case with other venues that publicity material informs people of the correct directions and not to follow sat navigation instruments when getting close to the site to avoid unintentional disruption to local residents and that customers should follow directions to the golf club. Screening is also proposed along the northern boundary of the site to interrupt views of the caravans. It is intended that facilities at the club house and Garden of Eden suite are used for entertainment and although the level of use may increase the noise interruption from such facilities is some distance away from residents of Crosbymoor.
- 6.20 There are also residential properties close to the club house however there is already existing woodland to screen the proposed caravans from those residential properties. They will however notice the increased traffic towards the club house entrance.
- 6.21 Given the existing use of the site and the distance from the development, the proposal is unlikely to have a significant impact on the living conditions of occupiers of neighbouring properties through intensification of use or unacceptable noise and disturbance.
 - 5. Proposed Drainage Methods and Flood Risk

- 6.22 Given the scale of the application site there is a requirement to submit a Flood Risk Assessment with the application. It is known that the golf course has been the subject of flooding from recent events in the area and much of the golf course is situated in Flood Zones 2 and 3. The site for the caravan proposal is however within Flood Zone 1 being on higher land than the rest of the golf course and as such is at low risk of flooding. It should be noted however that as the development contains areas of hard standing for the units as well as roads and parking, there will be the potential to increase surface water run off which needs to be controlled as part of a drainage strategy for the site. In addition, as the golf club house and access road are prone to flooding it may result in exceptional circumstances that the caravan park is cut off from the surrounding road network. For those exceptional circumstances there would be a requirement to access the A689 via Crosbymoor although this would only occur whilst the nearby roads were in flood.
- 6.23 There is a clear policy requirement to provide adequate provision for foul and surface water facilities to ensure that sufficient capacity exists prior to commencement of any development and that development proposals do not have an adverse impact on the environment.
- 6.24 A revised drainage strategy was prepared as the Lead Local Flood Authority (LLFA) required additional information to ensure that surface water drainage was no greater than that which would naturally occur prior to the development with additional capacity for climate change. Additional survey and percolation testing was carried out to consider the flow of water from the site and the submitted documents illustrate that surface water will be stored in detention basins and then disposed of via an existing watercourse. Swales and filter trenches will also be used to assist with drainage from the roads which will have permeable gravel surfaces. There are also ponds and unnamed water courses as part of the golf course development which can also be utilised.
- 6.25 The LLFA has considered the revised information and acknowledge that the applicant has demonstrated that the detention basin and infiltration strips have sufficient storage to accommodate a 1 in 100 year plus 40% to account for climate change storm event. This is acceptable to the LLFA and they therefore raise no objections subject to implementation of the drainage strategy.
- 6.26 With regards to foul drainage, the drainage strategy states that "sewer records show no available foul water sewer on site, with the nearest potential foul sewer connection located a significant distance from the site at Low Crosby School. This existing sewer is situated to the northwest of the site and beneath Crosby Road. The minimum distance from site to this discharge point is approximately 1.75km when taking a direct route. It is therefore proposed to connect into the existing foul sewer." United Utilities (UU) have responded that they have no direct assets at the site but have not objected to the potential connection off site which would be a matter of negotiation for the developer. Should it not prove acceptable to UU an alternative would have to be sought and would be subject of a further submission.

- 6.27 Subject to compliance with the recommended conditions in respect of foul and surface water drainage the proposal drainage methods are acceptable and accord with the objectives of the NPPF, PPG and relevant local plan policies.
 - 6. Impact Of The Proposal On Highway Safety
- 6.28 Policies EC10 and EC11 of the local plan seek to ensure that development proposals should normally be accessible by public transport, walking and cycling. However; for some developments in the rural area this may not be possible. In these cases new development should be able to demonstrate that adequate access/parking is available and that proposals do not lead to an increase in traffic levels beyond the capacity of the surrounding local highway network.
- 6.29 The proposed development utilises an existing access which is considered to be appropriately designed to accommodate the proposed development. It is well related to an established cycle route (National Route 72) and there have previously been opportunities for public transport access from the adjacent village and the A689 (however at the time of the application these services were not provided). Concerns were raised with the initial transport statement which accompanied the application regarding the volume of traffic arising from the development and a lack of clarity over potential access to the A689 by vehicular traffic. The Parish Council raised a number of concerns about the potential traffic impact and these were brought to the attention of the Local Highway Authority in considering this application. Additional information was subsequently submitted by the applicant.
- 6.30 Cumbria County, as Highway Authority, have considered the revised information and note that: The applicant has confirmed that the proposed development is to have a single access point onto the U1181 and not a secondary access onto the A689. Further to this a speed survey was undertaken in May 2021 to determine vehicular speeds on the U1181 and to inform the visibility splays associated with the access. The results of the speed survey determine that the 85th percentile speeds are 45mph in both directions. Therefore the visibility splay requirements for the access junction onto the U1181 are 2.4m x 160m in both directions. It is noted within the revised Transport Statement that a visibility splay plan has been produced which illustrates that visibility splays and fences under the ownership of the applicant and within the visibility splay are to be reduced to a height of 1.05m so as not to impede the splays.
- 6.31 Additional traffic counts were undertaken and the Highways Authority have considered the results of the Transport Statement and have determined that the increase in use of the access onto the U1181 will have a negligible impact on the safety of the U1181.
- 6.32 A cycle survey was also undertaken in May 2021 for 1 week which determined that the average week day total over a 24 hour period was 22

cyclists 2 way movements. The Transport Statement concludes that the maximum number of cyclists passing the golf course access was 10 between 1pm and 2pm on a Saturday and therefore that the proposed additional usage would have a minimal impact on cyclists. The Highways Authority have considered this view and agree that the proposed holiday accommodation will have a minimal impact on cyclists using the U1181.

- 6.33 Overall the Highway Authority raise no objections to the proposal subject to the imposition of conditions. The concerns of the parish council are respected, however; given the views of the Highway Authority it would be difficult to substantiate a refusal of the application on highway safety grounds in line with the NPPF.
 - 7. Impact Of The Proposal On Biodiversity
- 6.34 The Councils GIS Layer has identified that there is the potential for several key species to be present within the vicinity. A Preliminary Environmental Assessment was undertaken which considered a wide range of potential impacts which would result from work in the vicinity of the woodland, surrounding countryside and the potential for the site to drain into the River Eden. Natural England were consulted on the application and whilst acknowledging the mitigation which would be required would also require a Construction Environmental Management Plan to ensure adequate measures are taken to protect the natural environment and protect species from any harm. In particular ensuring that no run-off causes harm to the river environment. A revised drainage strategy has been produced which increases the retention of water on site and infiltration prior to discharge towards the watercourse. The existing ponds on the golf course are designed not only to assist with drainage but as features of the golf course and as such are regularly maintained and dredged thereby ensuring that they function for water run off and some storage but their environmental benefit is reduced due to maintenance interventions.
- 6.35 In order to ensure that there are environmental benefits, the proposal includes a landscaping scheme and there would be a net gain in tree planting through extensive planting of young trees across the site including around the site boundaries to tie in with existing hedges. The hedgerow reinforcement planting to the boundaries could be combined with native hedgerow trees and hedge margin seeding with wild flower grassland to enhance biodiversity and provide an improvement in habitat value. The open space associated with the pond presents opportunities to extend wet marshland and species rich wet meadows and a diverse range of native trees and shrubs to enhance the local biodiversity.
 - 8. Archaeology
- 6.36 The site lies within the Frontiers of Hadrian's Wall area therefore an archeological desk based survey and geophysical survey have been undertaken. The Historic Environment Officer at the County Council has been consulted and observed that the construction of the proposed development will disturb buried archaeological assets. As a consequence he recommends

that an archaeological evaluation and, where necessary, a scheme of archaeological recording of the site be undertaken in advance of development and advises that this work should be commissioned and undertaken at the expense of the developer. He considers however that this programme of work can be secured through the inclusion of two conditions

9. Other Matters

- 6.37 Two other matters have been raised including waste collection which will have to be organised by the site owner who already has collection arrangements for the golf course which may be extended or alternative measures brought in to deal with recycling and other waste materials. A further concern raised refers to light pollution as the roadways and paths will have to have some lighting however it would be appropriate to condition the style of lighting so that it is done in an environmentally sensitive manner with low level lighting to avoid light pollution as much as possible.
- 6.38 One resident requested a public meeting however no further requests for a meeting have been made and the application has been correctly advertised and notified in accordance with the Regulations.

Conclusion

- 6.39 In overall terms, the principle of development is acceptable. The location, scale and design of the development is appropriate to the location and the character of the area with adequate access/parking achievable and it would not lead to an increase in traffic levels beyond the capacity of the surrounding local highway network. Any perceived visual impact from public viewpoints would be mitigated through the reinforcement of the existing hedgerows and tree planting with further planting proposed within the application site. Given the existing use of the site together with the distance from those residential properties out with the site it is unlikely that the development would have a significant detrimental impact on the living conditions of the occupiers of those properties through intensification of use or unacceptable noise and disturbance. Compliance with pre-commencement conditions in respect of foul and surface water drainage schemes would ensure adequate drainage facilities to serve the proposed development. Enhanced planting and the formation of water features also would provide an opportunity for net biodiversity gain.
- 6.40 The proposal accords with the objectives of the NPPF, PPG and relevant local plan policies and the application is recommended for approval.

7. Planning History

7.1 The planning history associated with this site relates to the operation of the golf club (layout of course and clubhouse, etc.) and the erection of the Marquee for the Garden of Eden venue.

8. Recommendation: Grant Permission

1. The development shall be begun not later than the expiration of 3 years beginning with the date of the grant of this permission.

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

- 2. The development shall be undertaken in strict accordance with the approved documents for this Planning Permission which comprise:
 - 1. the submitted planning application form received 8 February 2021;
 - 2. the Site Location Plan received 8 February 2021;
 - 3. the Block Plan received 8 February 2021;
 - 4. the Floor Plan for 2 Bed Unit received 24 February 2021;
 - 5. the Elevation for 2 Bed Unit received 24 February 2021;
 - 6. the Floor Plan for 3 Bed Unit received 24 February 2021;
 - 7. the Elevation for 3 Bed Unit received 24 February 2021;
 - 8. the Outline Drainage Strategy (Drawing No. 200) received 29 June 2021;
 - 9. the Amended Drainage Strategy received 24 June 2021;
 - 10. the Landscape Design Concept received 8 February 2021;
 - 11. the Landscape Analysis received 8 February 2021;
 - 12. the Design & Access Statement 8 February 2021;
 - 13. the Flood Risk Assessment received 8 February 2021;
 - 14. the Planning Statement received 8 February 2021;
 - 15. the Transport Statement received 8 February 2021;
 - 16. the Additional Transport Information Letter received 10 June 2021;
 - 17. the Desk Based Assessment & Geophysical Survey received 9 March 2021;
 - 18. the Preliminary Ecological Appraisal received 15 March 2021;
 - 19. the LVIA Report received 8 February 2021;
 - 20. the Notice of Decision;
 - 21. any such variation as may subsequently be approved in writing by the Local Planning Authority.

Reason: To define the permission.

- 3. No chalet, caravan or other unit of tourism accommodation as described in the planning permission shall be occupied other than by bona fide holidaymakers, shall not be occupied for more than 28 successive days/weeks by any individual or group, and any such individual or group shall not occupy the chalet, caravan or unit as otherwise specified for more than 13 weeks in any calendar year.
 - **Reason:** To ensure that the development accords with Policy EC10 of the Carlisle District Local Plan 2015-2030, which only offers support for bona fide tourism developments and not for permanent residential accommodation.
- 4. The development/use hereby permitted shall be restricted to self-catering tourist accommodation only and shall not be occupied as permanent residential accommodation either independently or in association with the golf club within which it is situated.
 - **Reason:** To ensure that the development accords with Policy EC10 of the Carlisle District Local Plan 2015-2030, which only offers support for bona fide tourism developments and not for permanent residential accommodation.
- 5. 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:
 - i) An archaeological evaluation;
 - ii) 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

- 6. 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 publically-accessible record is made of the archaeological remains that have been disturbed by the development.

7. Before any development is commenced on the site, including site works of any description, a protective fence in accordance with Fig. 2 in B.S. 5837: 2012 shall be erected around the trees and hedges to be retained at the extent of the Root Protection Area as calculated using the formula set out in B.S. 5837. Within the areas fenced off no fires shall be lit, the existing ground level shall be neither raised nor lowered, and no materials, temporary buildings or surplus soil of any kind shall be placed or stored thereon. The fence shall thereafter be retained at all times during construction works on the site.

Reason: In order to ensure that adequate protection is afforded to all trees/hedges to be retained on site in support of Policies SP6 and GI6 of the Carlisle District Local Plan 2015-2030.

- 8. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out within a timeframe that has first been submitted to and approved in writing by the local planning authority and maintained thereafter in accordance with maintenance measures identified in the approved landscaping scheme. 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 maintained, in the interests of public and environmental amenity, in accordance with Policies SP6 and Gl6 of the Carlisle District Local Plan 2015-2030.
- 9. The development shall be carried out in accordance with the mitigation measures as set out in the Hesketh Ecology Preliminary Ecological Appraisal document reference STP20PEA025.001.

Reason: In the interests of ecological protection and safeguarding.

10. No caravan shall be occupied until its drainage system is connected to a public sewer.

Reason: To ensure that adequate drainage facilities are available.

11. Prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance 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 surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and

unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly.

The drainage scheme submitted for approval shall also be in accordance with the principles set out in the Flood Risk Assessment & Drainage Statement dated July 2021 proposing surface water discharging to soakaways. 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
- 12. The development shall not commence until visibility splays providing clear visibility of 160 metres measured 2.4 metres down the centre of the access road and the nearside channel line of the carriageway edge have been provided at the junction of the access road with the county highway. 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 Local Transport Plan Policies: LD7 and LD8.
- 13. Any existing highway fence/wall boundary shall be reduced to a height not exceeding 1.05m above the carriageway level of the adjacent highway in accordance with details submitted to the Local Planning Authority and which have subsequently been approved (before development commences) (before the development is brought into use) and shall not be raised to a height exceeding 1.05m thereafter.
 - **Reason:** In the interests of highway safety. To support Local Transport Plan Policies LD7 and LD8
- 14. No development shall commence until a construction surface water management plan has been agreed in writing with the local planning authority.
 - **Reason:** To safeguard against flooding to surrounding sites and to safeguard against pollution of surrounding watercourses and drainage systems.
- 15. 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 1800 hours on weekdays and 1300 hours on Saturdays

(nor at any times on Sundays or statutory holidays).

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

- 16. Details of satisfactory facilities to be provided for the storage and removal of refuse from the site shall be submitted to and approved by or on behalf of the local planning authority before the units are occupied. The facilities approved in response to this condition shall be provided prior to the first occupation of any part of the development and shall thereafter be retained.
 - **Reason**: In order to safeguard the environmental amenities of the area, and to accord with Policy CM5 of the Carlisle District Local Plan 2015-2030.
- 17. Development shall not commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the local planning authority. The CTMP shall include details of:

• Retained areas for vehicle parking, maneuvering, loading and unloading for their specific purpose during the development;

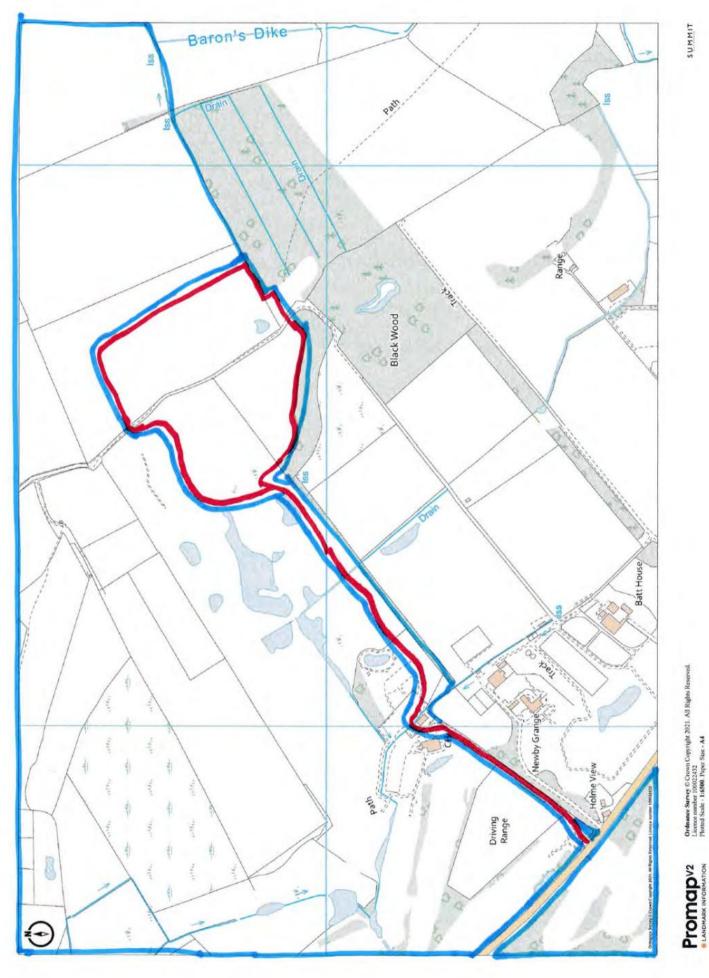
- Cleaning of site entrances and the adjacent public highway;
- Details of proposed wheel washing facilities;
- Construction vehicle routing;

• 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**: To ensure the undertaking of the development does not adversely impact upon the fabric or operation of the local highway network and in the interests of highway and pedestrian safety and to support Local Transport Plan Policies WS3 & LD4.
- 18. Prior to the installation, details of any external lighting (including location, design and specification) to be used on site shall be agreed in writing with the LPA. The development shall then be undertaken in strict accordance with these details.
 - **Reason:** In order to ensure the development does not have an adverse impact on wildlife and minimises light pollution in accordance with Policy GI3 and CM5 of the Carlisle District Local Plan 2015-2030.
- 19. Prior to the commencement of development a Construction Environmental Management Plan (CEMP) shall be submitted to and approved by the local planning authority. The CEMP shall ensure that all construction activities are well managed to avoid harm to the River Eden environment and shall include

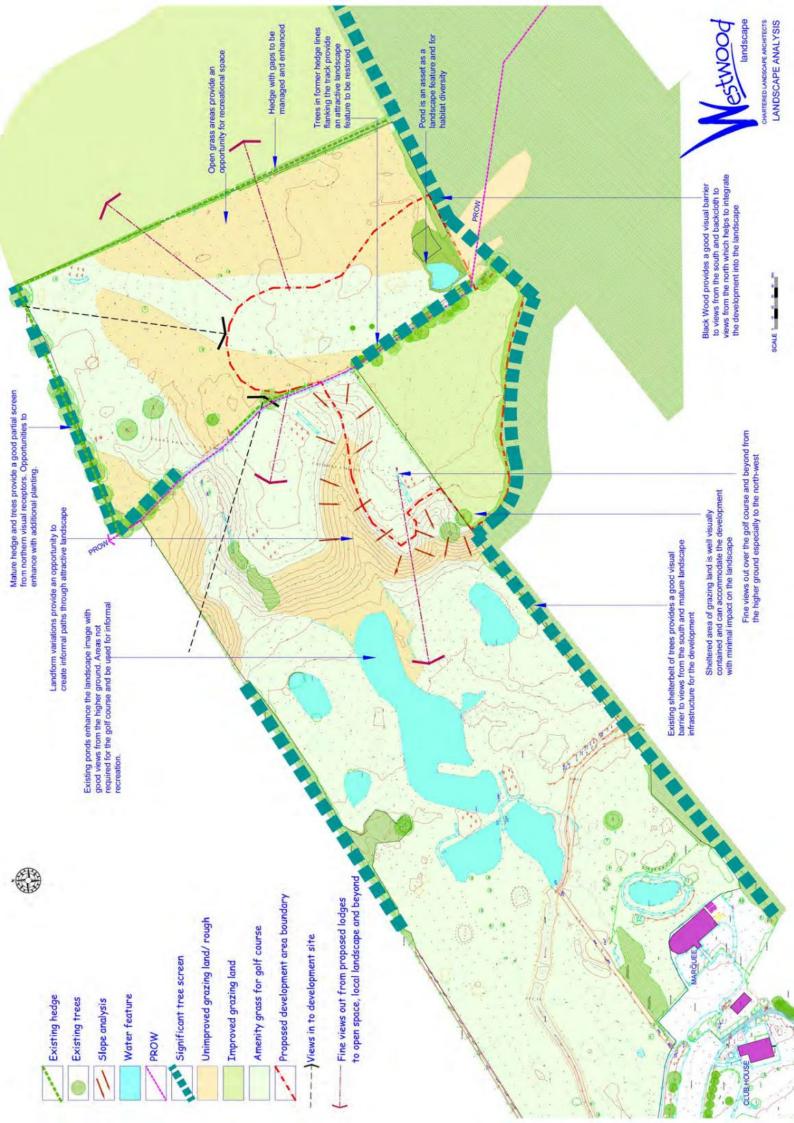
measures to prevent pollution including materials and machinery storage, biosecutiry and mitigation for the control and management of noise, fugitive dust, surface water run-off and waste.

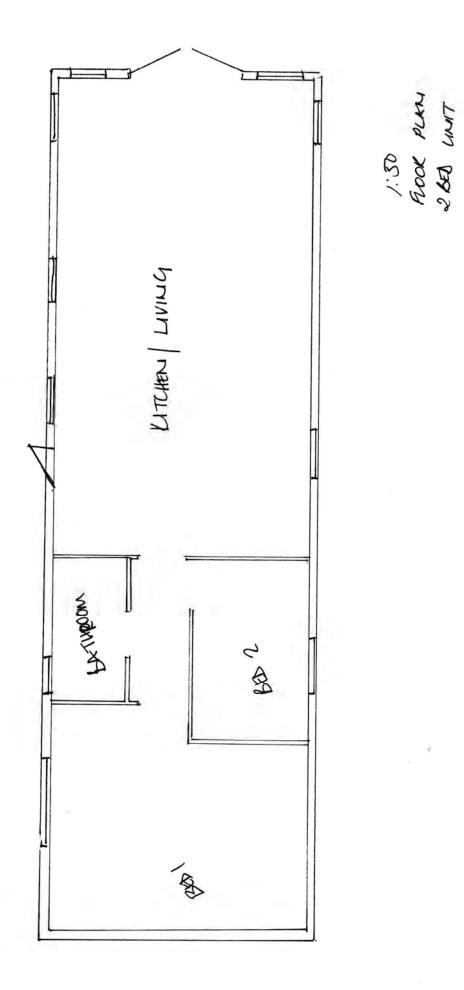
Reason: In the interests of environmental protection in line with Policies CM5 and GI3 of the Carlisle District Local Plan 2015-2030.



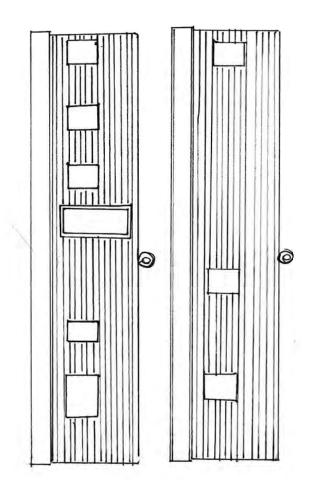


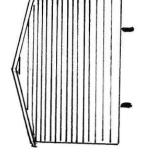




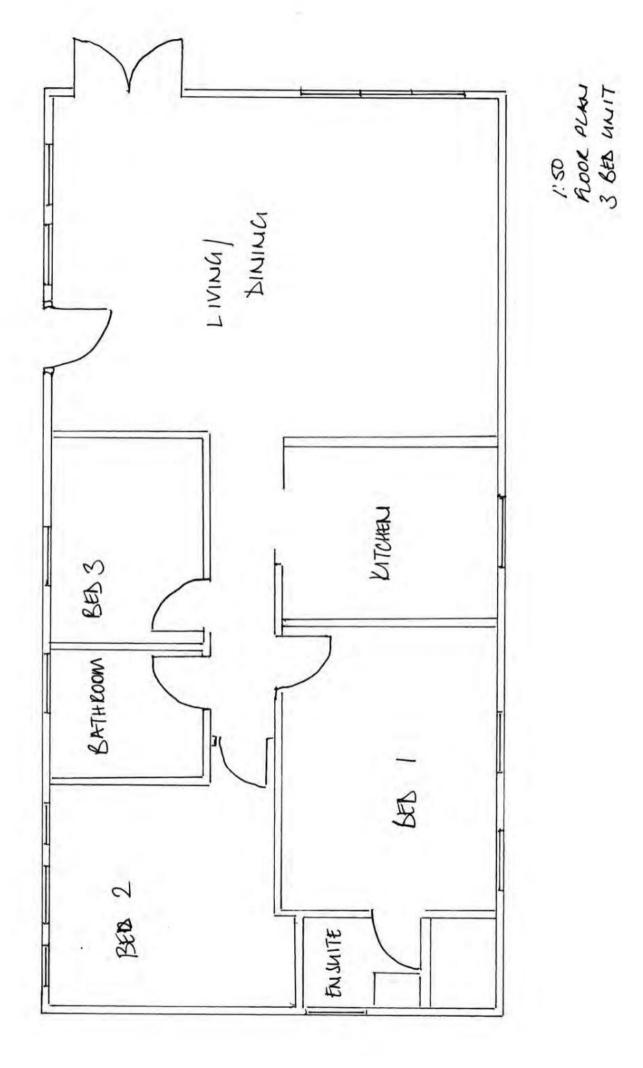


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