Fiona Kenmare  
St. Cuthbert’s Garden Village,  
Civic Centre,  
Rickergate,  
Carlisle,  
CA3 8QG.  

28 March 2018  

Dear Fiona

ST. CUTHBERT’S ‘GARDEN VILLAGE’ CONSULTATION

Friends of the Lake District is the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District, representing the Campaign to Protect Rural England in Cumbria.


The UK government has indicated that it is minded to support the development of an entirely new and very large settlement of up to 10,000 homes to the South of Carlisle and has awarded some initial funding for the development of this concept.

This submission amalgamates our initial reactions to and queries about:

• the first generic consultation on the St. Cuthbert’s ‘Garden Village’ consultation  
• the Sustainability Appraisal on St. Cuthbert’s and  
• the proposal for a Carlisle Southern Link Road

You can find the text of our comments on the pages below this covering letter.

We would like to be kept informed at every stage of the evolution of this ‘Garden Village’ concept and would welcome opportunities to contribute to its evolution as well as being able to respond to public consultations. As more details come to light about the proposal, we will be developing our position on it further.

Yours sincerely,

Dr Kate Willshaw  
Policy Officer

**Project Title**

The project title is not only somewhat misleading but it does not align with the UK government’s classification for a village. When
a ‘Garden Village’ was announced in 2016, Friends of the Lake District envisaged an entity recognisable as a large but recognisable English village.

The delineation between what constitutes a rural and an urban area was last looked at officially in 2004 by the Office for the Deputy Prime Minister, the Department for the Environment, Food and Rural Affairs, the Countryside Agency, the Office for National Statistics and the Welsh Assembly in 2004. They concluded that the demarcation between rural and urban and between a village and a town was a population of 10,000 – not a settlement of 10,000 dwellings. (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/137654/rural-urban-definition-methodology-intro.pdfhttps://www.gov.uk/government/uploads/system/uploads/attachment_data/file/137655/rural-urban-definition-methodology-technical.pdf)

As one of the consultation documents for St. Cuthbert’s explains, the new population generated would be in the order of 23,000 to 25,000. (Identification of Future Growth Opportunities on Carlisle by Regeneris, July 2017). There are no UK communities of this size which are classed as ‘villages’.

The urban area of Carlisle City has just over 30,000 dwellings. This was established by G. L. Hearn in association with J. G. Consulting when they produced the Housing Need and Demand Study in November 2011 which fed into the Carlisle Local Plan. They divided the District into Carlisle Urban, which had 32,095 dwellings at the time, Rural West, which had 3,996 dwellings and Rural East which had 11,528 (making a total of 47,619). (https://www.carlisle.gov.uk/LinkClick.aspx?fileticket=ZeM8AK8N5Yo%3d&portalid=24&timestamp=1520770562579). The statistics from the 2011 Census were released after this report and they showed that the total District housing stock had increased to just over 50,000 – but the point being made here is that, in housing terms, St. Cuthbert’s represents growing the urban city by a third.

There is also the matter of the scale of the land take that is now apparent. Interestingly, none of the consultation documents include an estimate of the land take for the new settlement. There is merely an estimate of the amount of land that would be required for employment purposes (9,350 sq.m) and for restaurants, cafes and other retail (5,800 sq.m). This appears in the evidence document which addresses economic growth. (Identification of Future Growth Opportunities in Carlisle by Regeneris, July 2017).

However, the indicative area for the new St. Cuthbert’s development is shown visually in several consultation documents. It is apparent from nearly all of them that the intention is for it to virtually replicate the size of the main built area of Carlisle (ie. Carlisle Urban). This is because the declared modus operandi is for St. Cuthbert’s to make lavish use of land by following the ‘garden city’ design principle – in effect creating another small city. But, as it would abut existing built areas in several places, what is effectively proposed here is a physical doubling in size of the existing city.

Consequently, there is no way, by any reasonable or logical reckoning that St. Cuthbert’s can – or should be - described as ‘a village’. There is a need for honesty and openness here about what is being proposed. The original description of ‘Carlisle South’ is probably the most accurate. As to the principles on which it is designed, we have more to say about that later.

**CARLISLE LOCAL PLAN**

The Carlisle District Local Plan 2015-2030, adopted in November 2016, was suitably vague about ‘Carlisle South’. The visual interpretation of it in the Key Diagram merely shows what can best be described as a facsimile of an upturned open fan spread around the south of the city centre. (Page 24).
The Spatial Vision waxes lyrical about Carlisle’s identity being “largely shaped by its extensive rural hinterland. It has an important agricultural economy and is set in an area of high landscape value.” Towards the end, it says: “Looking to the future a Masterplan is in place to guide the continued realisation of a sustainable major mixed use development at Carlisle South”. (Pages 11 and 12).

The Carlisle South Policy SP3, advocates the principle of garden cities and flags up the appropriateness of establishing Green Belt around them and it gives warning that “The potential of a southern relief road linking junction 42 of the M6 with the southern end of the A689 will be an integral part of the Master plan”. (Para. 3.3.2). In paragraph 3.34 it also states: “The broad location is of such a size that it would deliver a strategic number of houses and necessary supporting developments such as schools, employment, retail and community facilities such as open space and green and other infrastructure for the District”. The phraseology implies that if the development were of a substantial scale, then it would be appropriate to consider designating a Green Belt (to prevent further sprawl into the countryside). We would concur with this – but have not seen any mention of Green Belt in the consultation documents to date.

Point 5 of the Strategic Connectivity Policy – SP5 – commits to “develop a southern relief road linking junction 42 of the M6 with the southern end of the A689 as part of developing the broad location of Carlisle South”. Neither Policy SP3 nor Policy SP5 provide any clue as to where the southern ‘relief road’ would lie in relation to the southern boundary of ‘Carlisle South’.

The Housing Strategy and Policy SP2 on Strategic Growth and Distribution are presented in such a manner that it is not easy to understand the sheer scale of the Carlisle South aspiration. For instance, the policy and paragraph 3.8 identify a requirement for 9,606 net new homes between 2013 and 2030 but then 1(b) of the policy says: “Carlisle South has been identified as a broad location to accommodate additional housing growth in accordance with SP3”. (Our highlighting).

Also, misleadingly, paragraph 3.13 says: “Excluding Carlisle South the spatial strategy seeks to focus the majority (70%) of new housing growth within it on the edge of the City of Carlisle which aside from reflecting that this is where the majority of housing needs arise within the District also reflects a desire to enhance the City’s role as a sub-regional centre ... The remainder of housing growth (30%) will occur within the District’s rural settlements including Brampton and Longton”. (Page 30). Obviously, this phraseology is designed to give reassurance that the majority of new development would be taking place in the urban areas. However, it is apparent now that, once built out, Carlisle South (now rural) would have as many or more houses than the rest of the District put together.

We note that the ‘Carlisle South is identified as ‘Zone A’ in Policy HO4 on Affordable Housing. The policy says: “Within Zone A, all sites of six units and over will be required to provide 30% of the units as affordable housing”. This is welcome, although in view of the dire shortage of affordable housing in Cumbria as a whole and the scale of the St. Cuthbert’s proposal, we believe there is a strong case for making this percentage a lot higher. We also welcome the government’s determination, as expressed in the National Planning Policy Framework refresh, to stop developers arguing down the percentage of affordable houses they finally deliver through viability assessments.

CARLISLE SOUTH PROSPECTUS & IDENTIFICATION OF FUTURE GROWTH OPPORTUNITIES

The Carlisle South Prospectus and the ‘Identification of Future Growth Opportunities in Carlisle’ were produced by Regeneris in 2017. They describe the Carlisle South proposal as “amongst the most ambitious and exciting planned developments within the north of England”. Interestingly, their reports reveal that the project was submitted for the ‘Healthy New Town’ initiative in 2015, (our highlighting) which is significantly different to the fact that St Cuthbert’s is now being put forward as a Garden Village.
Pages 6 and 7 of the Regeneris ‘Future Growth Opportunities’ report depicts on a map and on an aerial view an indicative boundary for Carlisle South, clearly demonstrating that, particularly when already allocated housing sites are taken into consideration, the St. Cuthbert’s area would be attached to already built areas of the city.

The document states that the current population of the entire Carlisle City District is 108,000 and it calculates that the new population of St. Cuthbert’s (23,000 to 25,000) would require 13,200 extra jobs (1.3 for every one of the 10,000 new dwellings built). It estimates there would be roughly 3,200 jobs created within St. Cuthbert’s itself, leaving 10,000 ‘free workers’ as it calls them. (This assumes that all the 3,200 jobs on site would be taken by people living in St. Cuthbert’s). (Paragraph xii). Regeneris also calculates that the employment land supply required within St. Cuthbert’s would be 82 ha. of B1, B2 and B8 space (although it then goes on to say that there is no evidence to bring this forward in the near future), plus over 15,000 sq.m of further employment/ retail/leisure space.

The report recognises that it will be necessary to “grow the number of developers active within Carlisle”, noting that last year some 502 homes were delivered and that was an all-time record. The assumption is that the first houses would be built in Carlisle South in 2025/6 (seven to eight years’ time) and it assumes that 1,450 dwellings would be completed in the new settlement by the end of the Local Plan period (2030). (This is a similar figure to the rest of the District, which is estimated at 1,470). However, it says that the build-out of Carlisle South/ St. Cuthbert’s could last almost 30 years, with full completion not being achieved until 2055. (Source of figures: Local Plan 2015 – 2030, housing trajectory).

It is apparent that for Carlisle South/ St. Cuthbert’s to take off, there would need to be step changes in the delivery of housing and jobs in Carlisle and that there would need to be a very delicate balance between what was delivered in the rest of the District and what was delivered in Carlisle South. On the jobs front, it is not good news to note that one of the major companies/ employers highlighted as occupying part of a major employment site on the other side of the city is Capita (which has recently issued a profits warning). Other challenges identified include the problems of land assembly, viability, the provision of adequate infrastructure and the assembling of adequate capacity and funding as well as major issues to be resolved with Network Rail because the St. Cuthbert’s site crosses two major rail lines.

The impression gleaned is that the entire Carlisle South/ St. Cuthbert’s project is as much one of hope and aspiration as one of a realistic, achievable proposal. Where it actually falls between those two extremes is a moot point. However Friends of the Lake District notes that the National Planning Policy Framework refresh proposes all Local Plans should be renewed within five years. If this is instigated, the Carlisle Local Plan examination in public would present the ideal opportunity to debate the Carlisle South/ St. Cuthbert’s proposal before an independent inspector in more detail than when the present plan went through examination.

We would also like to see an economic analysis which addresses how much agricultural business and output would be lost if the St. Cuthbert’s project were delivered in full (including the number of lost jobs).

LANDSCAPE & TOWNSCAPE APPRAISAL
The Landscape and Townscape Appraisal prepared by LUC in May 2017 covers the villages of Carleton, Brisco, Durdar, Blackwell and Cummersdale and includes an evaluation of “the visual importance of the Rivers Caldew and Petteril” (para. 1.1) but does not illustrate or dwell on their flood plains. (That said, it is proposed in the Sustainability Assessment Scoping Report that they be assessed). The Landscape Appraisal also states: “proposals for a new link were not part of their consideration as they were “at an early stage” (para. 1.8). However, the landscape and townscape work is very useful because of the way it breaks down the whole Carlisle South potential development area into seven character areas.
Character Area 1 (Lowland, ridge and valley) in the NW:
Adjacent to the village of Cummersdale, the area is almost entirely under arable cultivation. We note that this area has “high archaeological potential” (para. 4.2 and fig. 4.1) and that “away from the B5299, this is an undeveloped rural landscape” (para. 4.6).

Character Area 2
This comprises the River Caldew and its shallow valley which runs from north to south. The text explains that the Caldew forms part of the River Eden SSSI and a Special Area of Conservation (SAC) (Para. 5.12). It describes “a sense of tranquillity that is emphasised by the enclosed woodland landscape” (para. 5.19). It points out that it would be necessary for a new link road to cross over the Caldew and advises selecting an alignment which minimises impacts. The area has moderate archaeological potential (para. 5.3).

Character Area 3
Farmland to the east of the Caldew valley. Includes villages of Blackwell and Durdar and Carlisle racecourse. Archaeological potential assessed as ‘moderate-high’. Large semi regular arable fields with hedges, hedgerow trees and some distinctive lines of mature trees.

Character Area 4
Open farmland west of the River Petteril, large number of mature trees. Includes Brisco village. Archaeological potential ‘moderate-high’. “Small incised valley of Cammock Beck runs through north of the parcel” (para. 7.10) and also: “Brisco Common is an important if modest feature” (para. 7.16).

Character Area 5
“Composed largely of the floodplain of the River Petteril” (para. 8.2). Semi-natural grassland in the north. “Continuous green corridor that connects the urban area of Carlisle with Wreay Woods to the south, proving links for wildlife and people … veteran oak trees” (para. 8.11) and “the open nature of the landscape will be sensitive to development” (para. 8.13). Archaeological potential has been classed as ‘moderate’.

Character Area 6
Includes the M6 junction 42 in the far south and the hamlet of Carleton. “An undulating landscape of slightly elevated rolling farmland” and “skyline of mature trees” and “intensively farmed area” (para. 9.8). Archaeological potential – ‘high’.

All the above describe interesting field patterns which instill a strong sense of generations of agricultural working. There are also many important pockets of mature and veteran trees and woodland.

ST. CUTHBERT’S GARDEN VILLAGE MASTER PLAN: SUSTAINABILITY APPRAISAL SCOPING REPORT
In the introduction to their Environmental Appraisal scoping report, which was published in January this year, AECOM refer to the “vast area to the south of the Carlisle urban area” which they were required to survey.

They list the broad environmental themes they have scoped: air quality, biodiversity, climatic factors (flood risk and climate change), historic environment, landscape, land and soil, water quality, population and housing, health and wellbeing, travel and transport, economy and minerals and waste.

We largely agree with the SEA Framework.

We are pleased to note many important facets have already been identified including the existence of the flood plains of the Rivers Caldew and Petteril and some ancient woodlands. We also commend the
objectives of reducing the need to travel, having a low carbon economy, protecting water courses and conserving landscapes and the historic environment. However, specific consideration is required to ascertain potential increases in carbon emissions and there also needs to be an assessment of how views into and out of the North Pennines AONB and the Lake District Northern Fells would be affected if the settlement were built.

In addition, we strongly recommend that, because the scale of the proposal is so ambitious, there should be a ‘Plan B’ and possibly even a ‘Plan C” – representing more modest proposals – and they should be analysed. **It should not simply be a question of delivering this one enormous settlement – or not.** Nor should the delivery be dependent on creating an entirely new ‘Link Road’ and nor should there only be one concept for designing the project which is explored. The Garden City format makes very extravagant use of land. It does not treat it as a finite resource. The style of settlement does not exist anywhere in Cumbria and we do not consider that the extensive style is suited to Cumbria’s landscape.

CPRE and Friends of the Lake District do not have an issue with the right development in the right places. We support ‘smart growth’ and we support the concept of self-contained sustainable villages – of an appropriate scale – built to high design standards that reduce the need to travel. Designing a settlement which can only be facilitated by the development of a major road will not achieve modal shift and reduce the need to travel.

**CARLISLE SOUTHERN LINK ROAD**

Carlisle City Council is placing great store by an expressed ‘need’ for a southern link road. The fact of the matter is that no business case has been prepared for one and no proof of need has been forthcoming. **Sweeping statements about presumed economic and other benefits do not represent evidence.** There is nothing in the public domain to suggest that any formal transport appraisal process has been undertaken and impacts on other roads, the environment and communities are an unknown quantity.

CPRE and Friends of the Lake District believe that new road capacity should only ever be considered as a last option after all other alternatives have been explored and after public transport and public realm improvements which facilitate walking and cycling have been introduced. **New and widened roads only have a short term benefit as demonstrated by the CPRE report 'The end of the road – challenging the road building consensus' which was published in 2017** (http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus). This benefit is soon eroded by increased traffic using the new road capacity.

The Spatial Portrait in the Carlisle Local Plan admits: **“Travel to work is heavily dependent on private car usage with 40.8% of people working Carlisle District choosing to drive to work (source: Office of National Statistics Census 2011) despite the fact that 50% of people travel less than five km to their place of work. This level of car usage is partly due to accessibility to public transport across the District which varies considerably outside the urban area, with a number of areas having only limited services”** (page 18).

Without very persuasive evidence – and it is difficult to see what that might be – it is unlikely that Friends of the Lake District could support a new link road. It will most certainly not be indicating a preference for any alignment at this stage. Instead we would make a plea for the city to explore what might be possible with existing and redundant rail corridors for development and implementation of light rail/tram services and with the introduction of regular, high quality bus services.

We would also urge the City to explore the possibility of providing a network of on-road ‘Quiet Lanes’ and off road ‘Greenways’ for cyclists and walkers and better cycle parking provision throughout the District.
FINAL POINTS AND CONCLUSIONS

Friends of the Lake District could support the concept of one or more modest size new villages of the right design in the most sustainable locations. South Carlisle outside the flood plains and designated wildlife areas is a likely location. However, we have concerns about the sheer scale of the St. Cuthbert’s proposal which is not, by the government’s own standards, a ‘Village’ and about the fact that a southern link road is being seen as a *sine qua non* for it.

It says in the spatial vision of the Carlisle Local Plan: “People are attracted to visit, live, work, invest and importantly remain in the District of Carlisle, a key driver of which is the setting of the historic city” (our highlighting). (Page 10). The setting would in fact be seriously impacted by a sprawling developed area which was virtually equivalent again to the size of the urban part of the city.

The spatial portrait also emphasises the need “to protect and enhance the very assets that make Carlisle unique, including its important natural landscapes, wildlife species, habitats and geodiversity and its cultural and heritage relics” (our highlighting). Laying out a new settlement in a garden city style is not a ‘natural’ look. It would not be appropriate in Cumbria.

The idea of one (or more) new villages of a modest scale near Carlisle is an exciting one. The idea of a sprawling extension to the city which is out of keeping with either it or the surrounding rural settlements is a deeply worrying prospect. We urge caution and we urge the Council to have a ‘Plan B’ and a ‘Plan C’, both of which are more modest in proportions and both of which are not predicated on the delivery of a major new road.

Apart from anything else, as indicated in some of the literature accompanying the consultation, there are issues around job creation and the capacity to build. Added to which, following the publication of the government’s formula for calculating housing need, (in the Right Homes for the Right Places consultation), Carlisle’s indicative assessment has fallen dramatically. The current assessment in the Carlisle Local Plan (not counting the Carlisle South proposal) is for between 480 and 565 dwelling p.a. Applying the government’s new formula, the indicative assessment for 2016-2026 is 211 dwellings p.a. (between 37% and 44% less). It would appear that Carlisle’s aspirations are out of all proportion with what is needed and what can be achieved.