10 August 2018

Dear Sir or Madam

ST. CUTHBERT’S ‘GARDEN VILLAGE’ CONCEPT PROPOSALS AND VISION 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. We welcome the opportunity to comment on this Concept Proposals and Vision stage consultation for the proposed Garden Village south of Carlisle.

We made comments in response to the earlier consultation on the St. Cuthbert’s proposals and this response builds on, and should be read in the context of, our earlier comments. For ease of reference, I attach a copy of our earlier comments.

We would like to be kept informed at every stage of the evolution of this ‘Garden Village’ concept and would welcome further opportunities to contribute to its evolution as well as being able to respond to public consultations.

Yours sincerely,

Lorayne Woodend Wall MRTPI
Planning Officer – Friends of the Lake District
Previous comments
This response builds on, and should be read in the context of, our previous comments, which are attached to this submission for ease of reference. In summary, our earlier comments raised concerns relating to:

- The fact that the proposals are presented as a village, when they represent a quantity of development far in excess of that of the definition of a village;
- How the proposals fit with statements in the Carlisle Local Plan;
- The percentage of affordable housing proposed in the scheme;
- The assumptions made about need, employment availability and housing delivery rates and the mismatch between housing and job provision;
- The need for an assessment of the impacts on the North Pennines AONB and the Lake District Northern Fells;
- The lack of assessment of alternative and potentially more modest approaches to achieving the same aims, including consideration of an approach that is not reliant on a link road, and instead, is underpinned by sustainable transport options.

These concerns remain relevant.

Comments on the Concept Proposals and Vision Consultation

General comments
The consultation document is built around the 9 proposed principles for development and supporting sections. Whilst the principles are broadly commendable, they are principles that should underpin all new development. It will be essential that these positive ambitions translate into what is actually delivered on the ground if a genuinely sustainable development with a clear sense of place is to be achieved.

Section 4 of the consultation document strongly suggests that what is now proposed is 4 village extensions. As indicated in our earlier comments, we can confirm that we prefer this approach, which offers more scope to limit landscape and cultural heritage impacts and will offer greater opportunities for enhancement/net environmental gain than a single, large extension to Carlisle. However, our preference for this option is subject to our outstanding concerns being addressed and the many positive intentions of the proposal being followed through in an appropriate and comprehensive way.

Although the document presents proposals for extensions to several existing villages, some of the terminology used in the consultation document does not make it clear whether St Cuthbert’s is to be one garden village or a number of villages and whether it is/they are part of Carlisle or separate from it. References such as ‘connected to Carlisle’ suggest that it is separate from Carlisle, yet reference to St. Cuthbert’s ‘enhancing Carlisle’s offer, making it a more attractive place to choose to live’ suggest it is to be part of the City. These points need to be clarified to enable people to properly understand exactly what is being proposed and also to inform the working up of detailed proposals as these factors underpin some of the fundamental aspects of the scheme. Somewhere that is a village in its own right might be expected to look and feel quite different to somewhere that is part of a city.

We would also ask that future implications of the St. Cuthbert’s proposal are considered; for instance, the route of the proposed Carlisle Southern Link Road (CSLR) means that it will form the southern edge to Durdar and the wider St Cuthbert’s site (as confirmed on page 27), save for one employment area, potentially setting a precedent for opening up the area the south of the CSLR to
development. Following our earlier comments, Carlisle Local Plan Carlisle South policy SP3 implies that if development of a substantial scale were to take place to the south of Carlisle, then it would be appropriate to consider designating a Green Belt to prevent further sprawl into the countryside. We would support this or a similar designation to prevent future sprawl but there is no information on this in the consultation document. Without such measures there would also be a risk of merging the expanded settlements despite a conscious decision now to keep them separate and distinct. We are concerned that the CLSR could end up becoming the southern boundary of an enlarged Carlisle with the land between the current city boundary and the link road being seen as an opportunity for infill development.

We also consider that the cumulative impacts of St. Cuthbert’s with other major proposals in Cumbria, such as Eden Masterplan, needs to be taken into account. Neither this document nor the Eden Masterplan document have looked into the cumulative impact of both proposals along with other infrastructure proposals such as Highways England’s proposals for upgrading the A66.

There are very limited references to the Lake District National Park, Hadrian’s Wall World Heritage Site, the Solway Coast AONB and North Pennines AONB despite the inclusion of several references to the Lake District World Heritage Site. This should be corrected to give a comprehensive picture of the content of St. Cuthbert’s in relation to these important designations. There is no reference in the document to the River Eden SAC, of which the River Caldew is part and the reference to the River Caldew SSSI should in fact refer to the River Eden and Tributaries SSSI and River Eden SAC (the SAC having the higher level of designation and more implications for compilation of the Environmental Impact Assessment). The presence of these should be made clear in the document, including in the text and on the various diagrams. The presence of the SAC and the proximity of the proposals to other Natura 2000 sites mean that a Habitats Regulations Assessment will need to be scoped into the environmental impact assessment process.

St. Cuthbert’s is a project on a scale that has not been seen in Cumbria for many years, if at all. A development of this magnitude is an opportunity to support Cumbria in becoming a leader for genuinely sustainable, environment-led development, including through exemplary design, green infrastructure and travel approaches, reflecting its unique landscape, geography, character and history. This opportunity to deliver a genuinely innovative scheme should not be undervalued or lost.

Our specific comments follow and are structured in line with the 9 principles and supporting sections. There is much overlap between the 9 principles and our comments may have relevance to other principles even where they are provided under only one heading.

**Principle 1 – Start with the Park**

The title of this principle is confusing; it begs the question ‘what park?’ – An existing park? A new park? The National Park? The quote in the document from Wayne Hemingway might provide a more logical starting point – in the garden city, start with the garden – the garden representing the wider environment. The explanation of this principle states that the masterplan will be landscape-led. Whilst we welcome the proposal for landscape to be a key consideration, landscape and parks are not synonymous and parks are just one aspect of Green Infrastructure (GI) and the environment and the landscape or townscape. The approach would more accurately and beneficially be framed as ‘environment-led’ or ‘green infrastructure-led’. The environment is about more than the landscape, but equally, the landscape encompasses much more than just the view and in fact is a culmination of many aspects of the environment.
The proposals should identify how they reflect the Government’s 25 year environment plan, the NPPF requirements for enhancement and net gains for the natural environment and natural capital and ecosystems services approaches. Masterplanning should start with a GI Strategy and framework, identifying all the existing elements of GI, their quality and functionality and then estimating where the qualitative and quantitative gaps are and where additional GI functionality is needed. Only then can it be determined what enhancements to existing GI are needed and where and what new GI is required to deliver the functionality and connectivity required e.g. landscape character enhancement, flood risk management, habitat, active travel, health and well-being, network creation and how it can be best delivered (including through what type of GI). This approach would deliver on many of the ambitions set out in the document.

The approach set out appears to attempt to demonstrate an intention for a green infrastructure framework to underpin the masterplan but could articulate this more clearly and comprehensively. Whilst we commend the intentions of this principle, including the creation of new accessible and multi-functional green infrastructure, close working with relevant bodies, actual delivery and appropriate ongoing management are crucial for the success of this approach and the sustainability of the development as a whole. Special care must be taken to ensure that ancient woodland, other priority habitats and designated sites including the River Eden and tributaries SSSI and SAC are not only protected, but are appropriately enhanced and that net gains for biodiversity and the wider natural environment are secured across the St. Cuthbert’s site.

Principle 1: 4 refers to ‘exemplary landscape destinations’. It is unclear what is meant by this term, particularly as the image used to illustrate this appears to show a climbing wall. It is also unclear how this proposal relates to existing ‘destinations’ that might be considered to fit this description, such as the Lake District National Park or the Areas of Outstanding Natural Beauty in northern Cumbria. To ensure complementarity of location, type and appropriate uses between destinations, the relationship between new and existing ‘destinations’ of any description must be carefully considered.

Principle 1: 5 refers to ‘Innovative green Infrastructure provision’. However, the image used to illustrate this appears to show a vast planted nursery of leylandii-type trees, which gives a rather worrying impression of what might be considered ‘innovative green infrastructure’. We would recommend that GI specialists are engaged in the process from an early stage to ensure the most appropriate GI assessment and framework informs the development. Carlisle’s own excellent Green Infrastructure Strategy produced by Rebanks Consulting would be a reasonable starting point.

The ‘landscape vision diagram’ might also be usefully re-framed as a GI vision. The diagram shows only one Strategic Green Corridor running east to west. East-west and north-south connectivity along green corridors should be maximised and there is scope for a further Strategic Green Corridor to the north of the one shown, along the route of the proposed greenway between Print Fields and the proposed Petteril River Park. Is there scope for these to also be connected on a North-south axis?

The route of the proposed Strategic Green Corridor appears to have been informed solely by the route of an existing gas pipeline and easement, which could not be built upon anyway, rather than by any assessment of whether this is a likely desire line or whether situating it there can provide the most benefits in terms of meeting wider GI functionality needs. Does this route connect destinations that significant numbers of people currently and/or will need to travel between or is it proposed for ease and convenience?
**Principle 2 – Locally Distinctive**

Whilst we commend the intentions of this principle, it is crucial that these are followed through on the ground if the project is to create somewhere that is ‘uniquely Carlisle’ and ‘different to anywhere else’.

With regard to the ‘St Cuthbert’s beads’ concept, we suggest that some sensitive and imaginatively designed interpretation is incorporated into the scheme to convey and explain this link and other aspects of the area’s cultural heritage and character.

**Principle 3 – Quality Homes and Lifetime Neighbourhoods & Principle 4 – Community Focused**

We recognise and welcome the intention to provide a mix of dwelling types, sizes and tenures, including custom and self-build, lifetime, affordable and starter homes, inter-generational living and co-housing. The proportions of particular dwelling types, sizes and tenures and of affordable homes should be based on meeting identified, genuine local needs rather than ‘wants’ /demand and should include use of Local Occupancy and/or Principal Residence clauses to ensure that new housing provision is not lost to the second home market. If the development fails to meet needs then either needs will remain or further land-take will be required in order to meet them and any resultant environmental, social or economic losses will lack any justification. There should be a clear commitment to providing high levels of affordable housing.

Support for setting up Community Land Trusts, self-build groups, co-housing and similar community-led delivery and management mechanisms should form part of the wider proposals, including those for ‘exemplary delivery and stewardship’ under Principle 9.

We also welcome the intention for new ‘supporting services’ provision and ongoing community engagement as St Cuthbert’s develops, but it is crucial that more detail is provided on how these proposals will be delivered and maintained/sustained.

As well as being informed by local character, the design of new housing, other buildings and wider layouts should be sustainability-led, including through the incorporation of features to reduce and manage water and energy usage, maximise energy and water efficiency and to ensure that energy needs are met through decentralised and renewable/low carbon energy sources. Design features such as green roofs and walls should be treated as elements of the green infrastructure framework and sustainable design.

**Principle 5 – Innovative Employment Opportunities**

Supply chain opportunities should not be limited to those connected with energy developments in West Cumbria. There are a number of supply chain opportunities arising from or connected to the principles themselves and the St. Cuthbert’s proposals as a whole. Similarly, other supply chain opportunities should be explored. If a sustainable and largely self-sufficient community is to be built (as suggested on p.30 of the Proposals & Vision document) then these should be an important part of the mix of employment and a focus for skills development.

We welcome the intention for people to be able to work from home or locally. Live-work units and shared office spaces accessible to the community would be particularly welcome, as is support for local businesses. Following our earlier comments however, it remains unclear what percentage of those living in the new homes will also be able to work in St. Cuthbert’s and how it will be ensured that jobs will be matched to local skills.
Principle 6 – Healthy Environments
P6: 1 states that the masterplan will ensure that walking and cycling are the key modes of getting from A to B. We challenge this assertion given the clear focus remains on the CSLR, which continues to be described as ‘critical’ to the delivery of the whole St. Cuthbert’s project.

We also welcome the intention for promoting active lifestyles, residents being ‘at one’ with nature and the provision of facilities for residents to grow their own food and buy from farm shops, but again would welcome more detail on how these will be delivered and maintained/sustained.
P6: 6 refers to Town and Country Planning Association (TCPA) research and evidence pointing to the benefits of considering health and well-being at the earliest stage of masterplanning. There is also TCPA research and evidence that recommends and provides guidance on how multi-functional green infrastructure underpins good planning to meet a wide range of objectives including health and wellbeing. This could also usefully inform the proposals.

Principle 7 – Smart and Sustainable Living
We welcome the forward-thinking proposals in this section and recognise that there is significant overlap between this and other principles. However, more detailed commitments should be made regarding sustainable design and transport and clearer information is required on delivery and how these innovations will be sustained throughout the lifetime of the development.

Principle 8 – Integrated Sustainable Transport
The points detailed under this principle are broadly welcomed. However, our earlier concerns remain in terms of the focus on new road capacity, particularly the proposed CSLR.
P8: 1 Refers to rail and bus provision as well as cycling, walking and car and bike-share. For rail in particular, this proposal is not supported by any further detail. Indeed, the Movement Framework on pages 27-28 makes no mention of rail. A scheme of this size should include consideration new rail stations and/or light rail (perhaps similar to that being developed in Dudley/Coventry) or tram services and the introduction of regular, high quality bus services. Lessons should be learned from comparisons of bike and car-share schemes already in operation.
P8: 5 More clarity is needed as to what is meant by ‘the opportunities presented by the CSLR’. Opportunities to drive investment through connecting people and places should be based upon improving provision of and access to sustainable modes of transport and not on fuelling a greater reliance on motorised transport/road travel. P8 refers to making walking and cycling the preferred choices but P8: 5 suggests that a main walking and cycling route will run alongside the CSLR. To make walking and cycling as attractive as possible, the impact of noise, fumes, safety issues and the desire to walk/cycle in a pleasant environment must be taken into account in route selection for walking/cycle paths.
P8: 6 Whilst having benefits for point-of-use emissions reductions and air quality, electric cars should not be relied upon too heavily as a means of delivering on sustainable transport objectives. They do not reduce car usage, congestion, demand for parking spaces or other impacts resulting from the presence of large numbers of vehicles in the natural or urban environment. They do not encourage the use of more sustainable and more active modes of travel, which have additional benefits, such as for health and well-being. In addition, there are environmental costs in their manufacture and issues with battery disposal.
**Principle 9 – Exemplary Delivery and Stewardship**

Regarding 9: 3, it will be crucial to avoid the expanded settlements becoming little more than dormitory villages by-passed by the CSLR. There will be a fine balance between new residents having access to Carlisle City Centre and having enough of the right facilities in the expanded settlements and the critical mass to sustain them. The greenway connections between the settlements should be a condition of the development going ahead and should not be referred to as ‘potential’ connections as on page 25. See also comment relevant to Principle 9 in comments on Principles 3 & 4.

**Issues and Opportunities**

3.1 – There is limited discussion of the constraints and what these might mean for the layout and design of the proposals. The diagram identifies areas currently affected by flood risk but this magnitude of development will result in a greater area of impermeable surfaces within the Eden catchment resulting in increased run-off rates. The impact on Eden’s flood hydrograph therefore needs to be considered, particularly considering the existing sensitivity of Carlisle to flood risk.

The diagram also suggests that development will be avoided in the area crossed by electricity transmission infrastructure. Is this the best option in order to achieve the most sustainable layout? Have the potential North West Coast Connections project, which could see the line moved or could offer an opportunity for it to be moved/undergrounded been taken into account? See also comment under Principle 1 regarding the route of the proposed Strategic Green Corridor/existing gas pipeline and easement.

The diagram key needs more explanation in terms of what is meant by ‘surface water area’ and ‘important buildings’. The River Eden SAC, of which the River Caldew is part, should be included on the diagram and the areas of Common Land that fall within the St. Cuthbert’s site boundaries should be identified as such, rather than as ‘greenspace sites’.

3.2 – The CSLR continues to be referred to as ‘critical’ to the delivery of St. Cuthbert’s. There is reference to the need to increase capacity to support growth and attract people to the area. Friends of the Lake District are unable to support a strategy based on car-driven growth or on an assumption that increased capacity for motorised transport is what people are or should be aspiring to. A modal shift can only be supported through new development if schemes of this scale lead the way and make sustainability their true driver by prioritising genuinely attractive and accessible sustainable transport options rather than treating them as a novel sub-strategy. The CSLR will not ‘directly support ambitions for enhanced public transport and a safe network of attractive foot and cycle routes’ as claimed. Also worrying is the statement that as the route for CSLR has now been decided, will work begin on understanding the role of existing arterial routes. This assessment, including an assessment of other options, including sustainable transport measures and reducing reliance on the car, should have informed (and therefore should have been done before the route was decided) the need and rationale for the CSLR.

More clarification and evidence is needed as to why heritage and landscape studies have been commissioned only for the area around Brisco and why sensitive development including ‘landscape treatment’ is only considered necessary around Brisco (para. 3.3 and 3.7). Para. 4 describes the landscape of the St. Cuthbert’s area as ‘exceptional’. The studies and measures proposed for Brisco should be apply to the whole of the St. Cuthbert’s area to ensure that evidence on these topics can be used to inform layout and design of the scheme and to ensure that development is appropriate to the local landscape character. The proposals, including the GI framework and overall scheme design and layout should also be informed by the Cumbria Landscape Character Guidance and...
Toolkit. The St. Cuthbert’s area falls within landscape character type 5: Lowland and sub-types 5b: Low farmland and 5d: Urban Fringe and there are clear guidelines in the document to help ensure that new developments respect and reinforce the character of these landscape types, including specific guidelines on new GI provision and village expansion. Following our earlier comments, there remains a need for impacts on the Northern Fells of the Lake District National Park and on the North Pennines AONB to be given proper consideration.

Para. 3.4 states that ‘housing led development appears to be viable’ and that ‘new build house prices are healthy’. It is critical that benchmark land values and landowner aspirations do not compromise the delivery of any of the many positive intentions set out, which would in turn compromise the quality and sustainability of the scheme meaning that it would fail to meet its vision, aims and objectives and that it could conflict with National Policy.

Para. 3.6 vaguely indicates that the expected land take ‘could be in the region of over’ 1300ha. and that up to 10,000 homes will be built at an average density of 30 per hectare, covering around 333ha with other uses covering the remainder. Specific areas are indicated for each of these other uses, but no area is given for employment uses (despite this being in the list of land uses) or green infrastructure. Following our earlier comments, clarity is needed on these matters. In relation to density, it would be helpful to provide two sets of figures, one for the overall St. Cuthbert’s area and another for the average expected of each settlement expansion. Whilst recognising that calculating development density overall will result a lower figure due to non-built uses, it is important that the areas of built development are highly efficient in their use of land and that the quality and functionality of undeveloped areas is maximised through appropriate GI enhancements. This will ensure minimal quantitative losses and provides the best potential for net increases and enhancements for the natural environment. Shared and communal accommodation options and facilities such as community gardens/allotments, offices, car share schemes etc can all potentially reduce land take as well as ensuring that development meets genuine needs and reflects local character and vernacular in terms of size, scale and settlement layout and form.

**Concept Proposals**
Section 4 refers to development at Brisco to be ‘unlikely to be of a scale that would support a local centre or shops’. This would beg the question of whether it can be considered a settlement suitable for expansion.

The Concept Proposals Diagram needs to be clearer as to what is indicated by the plain grey blobs and the ‘Key View Points’ need explanation – to what views to these relate, what is their significance and what measures will be taken in the development design to respond appropriately to them? Some of the proposals, including for employment areas south of the proposed CSLR route and at J42 of the M6, appear to be in open countryside and at least partly outside the red line of the identified St. Cuthbert’s area. It is not clear why this is the case or what the future implications of this might be (see also comment under General Comments regarding future implications). New employment should be delivered as part of mixed development within communities, not separate from them in locations that require use of the car.

**Key Benefits**
This section makes several assumptions about the benefits of the scheme, such as that new schools and services will be used by existing as well as new residents and that this will ease pressure on existing provision. It is not clear what evidence there is for this or what rationale lies behind it.
Reference is made to ‘providing sustainable transport for all users’ but as previously mentioned, the document fails to demonstrate that sustainable transport is to be given priority over individual motorised transport and increasing road capacity and there is a distinct lack of any proper consideration of rail-based options or bus services. Furthermore, there is an assumption that the CSLR will ease air quality issues and congestion in Carlisle City Centre. Evidence should be provided to demonstrate this, including evidence that explains why prioritising sustainable transport options and reducing the scale of development would not be more appropriate means of achieving this and other benefits.

We would welcome clarity as to what is meant by ‘opportunity to pilot smaller ways of service delivery and information’.