



**PERSIMMON HOMES AND CHARLES CHURCH LANCASHIRE
LAND AT ORTON ROAD,
CARLISLE,
CUMBRIA**

HERITAGE IMPACT ASSESSMENT

November 2019

DATE ISSUED: November 2019
JOB NUMBER: CL12337
OASIS REFERENCE: **wardella2-372738**
REPORT NUMBER: RPT-001
GRID REFERENCE: NY 37085 54644

PERSIMMON HOMES AND CHARLES CHURCH LANCASHIRE

LAND AT ORTON ROAD, CARLISLE

HERITAGE IMPACT ASSESSMENT

November 2019

PREPARED BY:

Ariane Buschmann Senior Archaeologist



REVIEWED BY:

Ed Johnson Principal Archaeologist



APPROVED BY:

Frank Giecco Technical Director



This report has been prepared by Wardell Armstrong LLP with all reasonable skill, care and diligence, within the terms of the Contract with the Client. The report is confidential to the Client and Wardell Armstrong LLP accepts no responsibility of whatever nature to third parties to whom this report may be made known.

No part of this document may be reproduced without the prior written approval of Wardell Armstrong LLP.



Wardell Armstrong is the trading name of Wardell Armstrong LLP, Registered in England No. OC307138.

Registered office: Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom

UK Offices: Stoke-on-Trent, Birmingham, Bolton, Cardiff, Carlisle, Edinburgh, Glasgow, Leeds, London, Manchester, Newcastle upon Tyne and Truro. International Offices: Almaty and Moscow.

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

CONTENTS

SUMMARY	1
ACKNOWLEDGEMENTS	2
1 INTRODUCTION	3
1.1 Circumstances of Project	3
1.2 The Purpose of the Heritage Impact Assessment	3
1.3 Planning Policy and Legislative Framework	3
1.4 Local Planning Policies	4
2 METHODOLOGY	5
2.1 Introduction	5
2.2 Documentary Sources	5
2.3 Site Visit	5
2.4 Impact Assessment Tables	5
2.5 Heritage Impact Assessment	6
2.6 Reporting	6
2.7 Glossary	7
3 DESCRIPTION	8
3.1 Location and Geology	8
3.2 Archaeological and Historical Background	8
3.3 Previous Archaeological Works	11
3.4 Site Visit	11
4 DISCUSSION	13
4.1 Summary of Heritage Asset Significance	13
4.2 Character of the Proposed Development	13
4.3 Magnitude of Impact of the Proposed Development	14
4.4 Heritage Statement	14
5 BIBLIOGRAPHY	16
5.1 Primary Sources	16
5.2 Secondary Sources	16
APPENDIX 1: HERITAGE IMPACT ASSESSMENT TABLES	18
APPENDIX 2: LIST OF HERITAGE ASSETS	22
APPENDIX 3: PLATES	26
APPENDIX 3: FIGURES	32

LIST OF ILLUSTRATIONS

FIGURES

- Figure 1: Site location
Figure 2: Detailed site location
Figure 3: Location of heritage assets within 800m study area
Figure 4: Plan of the Township of Cummersdale in the parish of Saint Mary 1841
Figure 5: First Edition Ordnance Survey Map 1897 (25 inch to 1 mile)
Figure 6: Third Edition Ordnance Survey Map 1972 (1:2500 scale)

PLATES

Plate 1: 1745 Plan of Carlisle and Surrounding Country	27
Plate 2: CCAC QRE/1/90 Enclosure Map and Award of Cummersdale 1770	27
Plate 3: Greenwoods map of 1823	28
Plate 4: 2018 Google Earth Imagery of site	28
Plate 5: Access to site from Orton Road	29
Plate 6: Orton Road towards Bunkershill	29
Plate 7: Orton Road towards St Edmunds Park	30
Plate 8: View across the site towards the south-east	30
Plate 9: Hedgerow bounding site towards St Edmunds Park, possibly kested	31

SUMMARY

Wardell Armstrong LLP (WA) was commissioned by Persimmon Homes and Charles Church Lancashire to prepare a Heritage Impact Assessment of land at Orton Road (centred on NGR NY 37085 54644), in advance of a planning application for the proposed redevelopment of the site for residential purposes. This work comprised the consultation of sources relating to the area's development and a site visit and aims to show the impact on the heritage significance of upstanding and below ground heritage assets within the 800m study area.

The site is located within the Sandsfield & Morton West Ward of the Carlisle District, at the western outskirts of the city of Carlisle. The site comprises two fields to the south-east of Orton Road, bound by modern development to the north-east, fields to the south-east and south-west, as well as Newhouse Farm to the south.

There are seven listed buildings within the site or the 800m study area (Assets 1-7). A further 10 heritage assets of local and negligible significance (Asset 8-16) were recorded in the Cumbria Historic Environment Record outside the site boundary, but within the 800m study area. A historic field boundary, which is a heritage asset of District or County (lesser) significance, as defined under the 1997 Hedgerow Regulations was noted through the assessment of cartographic evidence (Assets 17) within the site. Evidence shows that the proposed development site remained relatively unaltered throughout the post-medieval period, with no known structures ever existing within the site boundary. References to the area as common and moorland allow the assumption that no development of the site was undertaken in medieval times.

The current proposal would retain the greater part of the historic hedgerow (Asset 17) separating the agricultural fields, utilising it as garden boundary between two rows of buildings and cutting through it at the northern end for the road system. For the historic field boundary (Asset 17), this would create a substantial magnitude of impact, which would result in an overall limited impact (Appendix 1, Table 3), and may require some form of mitigation. The development may impact upon the setting of Newhouse Farm (Asset 11), to the immediate south-west of the site, which may require a low level of mitigation.

However, there is a potential for earlier activity which cannot be ruled out. There is therefore the potential for further, thus far unknown, below ground archaeology, to survive.

ACKNOWLEDGEMENTS

Wardell Armstrong LLP (WA) thanks Persimmon Homes and Charles Church Lancashire for commissioning the project and for all assistance throughout the work.

The site visit and documentary research were undertaken by Ariane Buschmann and Cat Peters.

The report was written by Ariane Buschmann and the figures were produced by Helen Phillips. Frank Giecco managed the project and Ed Johnson edited the report.

1 INTRODUCTION

1.1 Circumstances of Project

1.1.1 Wardell Armstrong LLP (WA) was commissioned by Persimmon Homes and Charles Church Lancashire to prepare a Heritage Impact Assessment of land off Orton Road, Carlisle (centred on NGR NY 37085 54644; Figure 1). This assessment was required as part of a planning application of a proposed redevelopment of the site for residential purposes.

1.2 The Purpose of the Heritage Impact Assessment

1.2.1 This Heritage Impact Assessment is designed to show the impact on the heritage significance of heritage assets within an 800m radius of the proposed development area, and hereafter referred to as the study area.

1.2.2 The Heritage Impact Assessment seeks to address in detail the issues of impacts on heritage significance of upstanding and below ground heritage assets and to do this it both seeks to understand the significance of the assets before evaluating the impact of the development proposals upon them.

1.3 Planning Policy and Legislative Framework

1.3.1 National planning policies on the conservation of the historic environment are set out in the *National Planning Policy Framework* (NPPF), which was updated by the Ministry of Housing, Communities and Local Government in June 2019 (MHCLG 2019). This is supported by *Planning Practice Guidance* (PPG) which was published in March 2014.

1.3.2 The NPPF draws a distinction between designated heritage assets and other remains considered to be of lesser significance. With regard to designated heritage assets, '*great weight should be given to the asset's conservation*'. The more important the asset, the greater the weight should be; substantial harm to or loss of a Grade II Listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including scheduled monuments, protected wreck sites, battlefields, Grade I and II* Listed Buildings and Grade I and II* Registered Parks and Gardens and World Heritage Sites, should be wholly exceptional (NPPF, para 194). Therefore, preservation in-situ is the preferred course in relation for such sites unless exceptional circumstances exist.

1.3.3 The NPPF advises that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets in order to enhance or better reveal their significance. Proposals that preserve those

elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (NPPF, para 202).

1.4 Local Planning Policies

1.4.1 The Carlisle District Local Plan 2015-2030 was adopted by the Carlisle City Council Council in November 2016. The relevant policy for cultural heritage and archaeology is SP 7: Valuing our Heritage and Cultural Identity.

1.4.2 The policy states that: *'The Council will, through planning decisions and in fulfilling its wider functions, proactively manage and work with partners to protect and enhance the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings. Opportunities will also be pursued, to aid the promotion, enjoyment, understanding and interpretation of both heritage and cultural assets, as a means of maximising wider public benefits and in reinforcing Carlisle's distinct identity.'*

1.4.3 *As well as fulfilling its statutory obligations, the Council will:*

a) seek to identify, protect and enhance locally identified heritage assets;

b) promote heritage-led regeneration including in relation to development opportunities in the City Centre;

c) produce conservation area appraisals and management plans;

d) develop a positive strategy to safeguard the future of any heritage assets that are considered to be 'at risk'; and

e) adopt a proactive approach to utilising development opportunities to increase the promotion and interpretation of the District's rich archaeological wealth.

1.4.4 *A more detailed suite of policies as a key mechanism through which to help safeguard the above assets and wider archaeological interest is set out in the historic environment chapter of the Plan (Carlisle City Council 2016, 50).*

2 METHODOLOGY

2.1 Introduction

2.1.1 The preparation of this Heritage Impact Assessment has been undertaken in accordance with guidance recommended by Historic England and prepared by Bassetlaw District Council (2011). Note is also taken of Historic England guidance on understanding place (2017) and on the setting of heritage assets (2015).

2.1.2 The data underlying the Heritage Statement was gathered through desk-based study of documentary sources and via a site visit. The impact of the development on the non-designated heritage assets within an 800m search radius was assessed using a series of standard tables (*confer* Appendix 1).

2.2 Documentary Sources

2.2.1 Primary and secondary sources were used to provide the background to the historical character of the study area. Much of the information in this Heritage Statement was derived from the results of previous archaeological investigations in the area, and from internet sources.

2.2.2 Historic England's guidance on historic area assessments, conservation areas and heritage asset setting was used to establish the compliance of the development scheme proposals with best practice planning guidance.

2.3 Site Visit

2.3.1 The site and its environs were visited on Monday 21st October 2019.

2.3.2 The site visit aimed to:

- identify any as yet unknown features within the proposed development site;
- identify whether any known features identified during the research are still present within the proposed development site boundaries;
- consider the impact of the proposed development on the heritage significance of the heritage assets within an 800m radius.

2.4 Impact Assessment Tables

2.4.1 The assessment of the impact of development proposals is undertaken using a series of heritage impact tables (Appendix 1). These tables use standard assessment methods as used by Government agencies, as for example those used in the Highway Agency's *Design Manual for Roads and Bridges* (2007). These tables first establish the

significance of the heritage asset against set criteria, secondly they estimate the magnitude of impact and, taking the results of these two together, allow a calculation of impact on overall heritage significance.

2.5 Heritage Impact Assessment

2.5.1 For the purposes of this report, the term '*site*' is used to refer to the area within the proposed development site boundaries (Figure 2) and the term '*study area*' is used for the wider 800m radial contextual area surrounding the site (Figure 3).

2.5.2 Several sources of information were consulted, in accordance with professional guidelines (ClfA 2014). A search of online resources was undertaken in order to identify any designated sites such as scheduled monuments, listed buildings and conservation areas, around the proposed development area. This was done in order to help assess the possible impact of the proposed development on archaeologically sensitive areas. The principal sources of information were historical maps and secondary sources.

2.5.3 **National Heritage List:** the online database of all designated assets (scheduled monuments, listed buildings, registered parks and gardens, battlefields etc.), maintained by Historic England (NHL 2019), was searched for the 800m study area, and the results detailed in Appendix 2 and illustrated in Figure 3.

2.5.4 **Cumbria Council Archive Carlisle:** the archive was visited on the 16th October, with primary and secondary sources being consulted for information relevant to the site's assessment.

2.5.5 **PastScape:** the online database of all non-designated assets, maintained by Historic England (Pastscape 2019), was searched for the 800m study area, and the results have been included in Appendix 2 and illustrated in Figure 3.

2.5.6 **Wardell Armstrong LLP:** various publications and unpublished reports on excavations and other work in the region are held within the Wardell Armstrong library and these were examined and are referenced as appropriate.

2.5.7 **Websites:** various websites were checked for information relevant to the site's assessment, including Google Earth™, the British Geological Survey, and the Archaeological Data Service. These are listed, as appropriate, in the bibliography.

2.6 Reporting

2.6.1 A digital copy of the report will be deposited with the Carlisle Archive, where viewing

will be made available on request.

2.6.2 Wardell Armstrong support the **Online Access** to the **Index** of archaeological investigations (**OASIS**) project. This project aims to provide an online index and access to the extensive and expanding body of grey literature created as a result of developer-funded archaeological work. As a result, details of the results of this study will be made available by Wardell Armstrong, as a part of this national scheme, under the code: **wardella2-372738**.

2.7 Glossary

2.7.1 The following standard terms are used throughout the report:

- Designation – the process that acknowledges the significance of a heritage asset and thus advances its level of consideration/protection within the planning process. Designated assets can either be statutory, like listed buildings, or non-statutory such as registered parks and gardens or conservation areas.
- Heritage Asset – a building, monument, site, place, area or defined landscape positively identified as having a degree of heritage significance that merits consideration in planning decisions.
- Mitigation – action taken to reduce potential adverse impacts on the heritage significance of a place.
- Setting – the surroundings in which a heritage asset is experienced. The extent is not fixed and will vary according to the historic character of the asset and the evolution of its surroundings.
- Significance – the value of a heritage asset to present and future generations attributable of its heritage interest. That interest may be archaeological, architectural, artistic or historic (including historical associations).

3 DESCRIPTION

3.1 Location and Geology

3.1.1 The site is located within the Sandsfield & Morton West Ward of the Carlisle District, to the west of the city of Carlisle (Figure 1). The site comprises two fields to the south-east of Orton Road. They are bound by modern development to the north-east, fields to the south-east and south-west, as well as Newhouse Farm to the south (Figure 2).

3.1.2 The sedimentary bedrock in the vicinity consists of predominantly mudstone of the Clitheroe Limestone Formation and Hodder Mudstone Formation, a sedimentary bedrock formed approximately 337 to 347 million years ago in the Carboniferous Period (BGS 2019). The superficial deposit comprises diamicton from the Devensian Till, a deposit formed up to 2 million years ago in the Quaternary Period (BGS 2019).

3.1.3 The Cumbria Historic Landscape Characterisation was defined by Cumbria County Council in 2009. The site falls between Area 10: Carlisle and Area 41: Solway Plain (Cumbria County Council 2009). Area 10 is defined by the city of Carlisle, with its extensive urban development. The less urbanised parts of the character area are still influenced by Carlisle and have many suburban features. The settlement pattern is highly nucleated, and whilst many have a medieval origin, 74% of the discrete settlements and small nucleations developed after 1770 (Cumbria County Council 2009, 51).

3.1.4 Area 41, however, is dominated by former common arable fields, with widespread areas of 19th century planned enclosures. There are small areas of anciently enclosed land, mostly belonging to individual farms. This mix of older and 19th century planned enclosures is reflected in the road system, with numerous meandering lanes amongst the former common arable fields, and fewer, straighter roads across areas of planned fields. The settlement pattern is varied, with large and small nucleated settlements intermixed with many discrete farms scattered across the landscape. Two thirds of the discrete farms post-date 1770, and many are related to the improvement and enclosure of the wastes. In contrast, most of the nucleated settlements are of medieval origin. The character area retains a considerable discernible legacy from the medieval period in both its settlement pattern and field systems (Cumbria County Council 2009, 95).

3.2 Archaeological and Historical Background

3.2.1 This historical and archaeological background is compiled from secondary sources and

primary records consulted in October 2019. It is intended only as a summary of historical developments around the site. The locations of known heritage assets within the 800m study area are shown in Figure 2 and summarised in Appendix 2.

- 3.2.2 There are seven grade II listed buildings within the 800m study area, but not within the site. They comprise five farms or dwellings dating between the 18th and 19th century (Assets 1, 3, 5-7), as well as a dovecote (Asset 2) and a milestone (Asset 4). Seven heritage assets of local significance (Assets 9, 11-16) were recorded in the Cumbria Historic Environment Record and PastScape outside the site boundary, but within the 800m study area. An additional historic boundary (Asset 17) was identified through the cartographic evidence.
- 3.2.3 **Prehistoric to Roman:** There very little evidence of prehistoric or Romano-British activity within the study area. A rather degenerate type of the Cumbrian club type polished stone axe (Asset 8) was found to the north-east of the site. It has been suggested that the presence of trimming scars so deep that they couldn't be polished out, indicates degenerate practice possibly caused by economic pressure in the Later Neolithic. The Thursby Roman Road (Asset 9) is part of the road between Carlisle and Papcastle. Church Street and Wigton Road in Carlisle mark the course, although the road is largely covered by the A595 (Roman Roads 2019). A possible D-shaped enclosure was noted as cropmark to the south of Broomhills (Asset 13).
- 3.2.4 **Medieval:** The site is historically set within the township of Cummersdale in the Parish of Saint Mary in Cumberland. There is little known about the early medieval development of Cummersdale, but a sparse population is suspected due to the insecure situation of the lands. The name Cummersdale is derived from the Old English *cumber* and the Old Norse *dalr*, which has been translated to 'valley of the Cumbrian Britons' (Mills 2003, 144). St Mary's was part of the manor of John de Chapple, which also contained the manors of Caldcoats, Newbiggin and New Laites. It is assumed that John de Chapple granted his manor to the priory until the Reformation, when it was given to the dean and chapter of the cathedral (Whellan 1860, 144). The areas outside the walled city of Carlisle suffered at the hands of the Scots, and later, the border rieviers (Cummersdale History 2019). Areas of medieval ridge and furrow (Asset 15) and a possibly medieval enclosure (Asset 12) have been identified within the study area, indicating to agricultural activity within the area.
- 3.2.5 **Post-medieval:** Prior to the Enclosure Act of 1769, the area of Cummersdale was mainly open moorland and used for grazing by the few local farms or holdings. St

Mary's was noted to contain a considerable amount of moor land, used as common land (Hutchinson 1794, 678). It wasn't until the enclosure of the commons in 1770 that the moorlands were divided. The proposed development site is at the western outskirts of an irregular-shaped area of older enclosures, referred to as grounds, which were bound by Keld Houses, New House (Asset 11) and Suttle House (Asset 3). 'Gound', in this case, most likely refers to a large area of grassland, and an area subject to earlier piecemeal enclosure. A parcel of land at the approximate location of the present site, abutting the 'Ground', was owned by a John Young (Plate 2). The site is associated with Keld Houses, which were also referred to as Kell Houses, a farmstead to the north-east of the site. The Kell Houses have been present since at least the very early 18th century, as an indenture mentions *John Young of Kell Houses*, who married Hannah Norman (CCAC CA/5/2/93). It later in 1747 references John Young the Younger. There appear to be two houses or farmsteads associated with the name on the 1745 Plan of Carlisle as well as on the late 1770 enclosure plan (Plates 1 and 2). The earliest reference to Newhouse Farm (Asset 11), to the immediate south-west of the site, is an indenture dated 1750 and it is shown on the 1770 enclosure map. Neither Newhouse nor Suttle House are shown on the 1745 map of Carlisle (Plate 1).

3.2.6 In 1786, the land passes to John Hind of Kirkandrews and in 1790 land went over in ownership from John Young to Monkhouse Davidson Esq. An early to mid-19th century estate plan of a Mr Wilson's Estate at Kell House shows the northern-eastern property and land, while indicating that Thomas Hudson owned the neighbouring property (CCAC DX 2369/6). It is therefore quite likely that the two properties, although both under the name of Kell Houses, were separate estates. The farmer William Ancell was noted as the occupier of the south-western farmstead in 1841 (Figure 4) and in the 1847 Cumberland Directory. It comprises two ranges of L-shaped buildings framing a central courtyard. Thomas Hudson was listed as the owner of these properties. The fields of the proposed development site were referred to as *Far Hill*, *Wood Close* and *Kield House Plantation*.

3.2.7 By 1840, Thomas Sowerby owned most of the land around Low Cummersdale, and lands at Brow Nelson, comprising overall 296 acres. William Maud also had considerable lands at Cummersdale, and at this date John Dalton, had acquired several fields and also leased some of Maud's lands in the parish (Cummersdale History 2019). The main employment within the parish were the printworks, established by the Ferguson and McAlpin families respectively (Mannix and Whellan 1847). By 1850 John Dalton had purchased all of William Mauds lands at Cummersdale. In 1897 the late Col

Sowerby's Dalston Hall Estate was for sale, which apart from the Hall and its grounds also included several farms and land in Cummersdale (Cummersdale History 2019). Carlisle expanded consistently in the 18th and 19th century, and various buildings in the surrounding area originate from that time period. These include Bunkershill and an associated dovecote (Assets 1 and 2), Newby West farmhouse (Asset 5), Maxwell Cottage (Asset 6) and Morton Cottage (Asset 7).

3.2.8 **Modern:** Henry Graham was noted to be the resident at the Kell House in 1897 (Kelly's Directory) and by 1901, the farmer Wallace Millican was recorded at Keld House (Bulmer's Directory 1901). Albeit the city of Carlisle was consistently expanding in the late 19th and first half of the 20th century, no development encroached upon the closer environs of the site. Only by 1972 (Figure 6) were noticeable changes to the surrounding area, with new houses built around the Keld Houses to the north-east of the site, and Morton School to the south. Following extensive residential development in the late 20th and early 21st century, buildings now enclose the site, directly abutting it to the north-west and in close proximity to the south.

3.3 Previous Archaeological Works

3.3.1 There are 15 recorded archaeological events within the search area. There were five archaeological interventions in close proximity of the site, include a geophysical survey (HER 1/16/3563) on land bordering the study area at Newhouse Farm, and a Desk-based Assessment from 2000 (HER 1/00/479) of land to the immediate east of the site. Two evaluations were undertaken by North Pennines Archaeology in 2003 (HER 1/08/1842) and North Pennines Heritage Trust in 2005 (HER 1/04/1200) at land to the south-east of the site. They predominantly found traces of post-medieval activity, including drainage possibly relating to the enclosure of the moorland, and a large post-medieval pond, which had been filled in. An evaluation was undertaken by Cotswold Archaeology in 2016 to the south-west of Newby West, where medieval ridge and furrow and pits were noted, to the south-west of the site (Pearson 2016). The area was also covered by the Eden Patteril Caldew Transect Air Photo and Lidar Mapping Project, which identified areas of post-medieval ridge and furrow within the study area.

3.4 Site Visit

3.4.1 The site was visited on Monday 21st October 2019. The site comprised two fields bound by high, possibly kested hedgerows (Plates 3 and 8). The hedgerows consist of mixed shrub and trees (Plates 5 - 8). The main access to the site was via a locked gate

off Orton Road at the north-western boundary of the site (Plate 4). The fields slope downhill to the south-east towards Dow Beck. The surrounding area is dominated by the modern development of St Edmunds Park to the north-east, and arable land to the north and south-west.

- 3.4.2 The high hedgerows along Orton Road create a visual curtain towards the two grade II listed buildings at Bunkershill (Assets 1 and 2), which are therefore not intervisible with the site (Plate 5).

4 DISCUSSION

4.1 Summary of Heritage Asset Significance

- 4.1.1 The surrounding area of the study area has been greatly impacted upon by the predominantly residential developments from the second half of the 20th century, although the site retained its, at least, post-medieval dated field system.
- 4.1.2 There are 17 heritage assets within the study area, one of which was noted through the assessment of cartographic evidence within the site (Asset 17). This is a potentially historic hedgerow, which can therefore be considered to be of District or County (lesser) significance (Appendix 1, Table 1).
- 4.1.3 Of the 16 heritage assets outside the site boundary, but within the study area, seven are grade II listed buildings (Assets 1-7), which can be considered to be of District or County (Higher) significance (Appendix 1, Table 1). They comprise predominantly 18th to early 19th century farm buildings and houses, such as Bunkershill House (Asset 1), Suttle House (Asset 3), Newby West Farmhouse (Asset 5) and two cottages (Asset 6 and 7). There is also one dovecot associated with Bunkershill (Asset 2) and a milestone at Suttle House (Asset 4).
- 4.1.4 Of the remaining nine heritage assets, seven can be considered to be of local significance (Appendix 1, Table 1). They comprise the site of the Thursby Roman Road (Asset 9), Newhouse farm (Asset 11), two enclosures (Assets 12 and 13), areas of ridge and furrow (Assets 15 and 16) and the earthwork of a former field boundary (Asset 14).
- 4.1.5 Two heritage assets within the study area are findspots, comprising a prehistoric stone axe find (Asset 8) and a medieval coin find (Asset 10). They are both of negligible significance (Appendix 1, Table 1).

4.2 Character of the Proposed Development

- 4.2.1 The proposed development site is currently in use as two agricultural fields. Historically, it was part of the Cummersdale commons and moors, and has been enclosed since at least the post-medieval period.
- 4.2.2 It is proposed to redevelop the site for residential purpose. The proposal comprises the erection of 199 residential dwellings, of which 60 are affordable housing. Dwellings are built as detached, semi-detached and terraces. There are two areas of public open space. Two areas of access are proposed, one from Orton Road to the north-west, and one from St Edmunds Park to the north-east. The current proposal

would retain the greater part of the historic hedgerow (Asset 17) separating the agricultural fields, utilising it as garden boundary between two rows of buildings and cutting through it at the northern end for the road system.

4.3 **Magnitude of Impact of the Proposed Development**

4.3.1 For 15 of the 16 known heritage assets outside the proposed development site boundaries, the magnitude of impact resulting from the development would be no change (Assets 1-10, 12-16), Although extensive already existing modern development has been undertaken surrounding the site, the proposed development may cause less than substantial impact upon the setting of Newhouse Farm (Asset 11; Appendix 1, Table 2).

4.3.2 The current known outline of the proposed development indicates that the entire site will be fully redeveloped. It is, however, proposed to mostly retain the hedgerow currently separating the proposed development site into two fields (Asset 17), although sections are to be removed. This hedgerow can be classed as a historic hedgerow protected under the 1997 Hedgerow Regulation. The magnitude of impact upon this heritage asset would therefore be defined as substantial, as the development would change some of the '*key archaeological materials*' and '*considerably change the setting*' (Appendix 1, Table 2).

4.4 **Heritage Statement**

4.4.1 For the historic field boundary (Asset 17), which is a heritage asset of District or County (lesser) significance, a substantial magnitude of impact will result in a limited impact (Appendix 1, Table 3). This may require some form of mitigation, dependent on advice from the Local Planning Authority archaeologist.

4.4.2 For Newhouse Farm, a heritage asset of local significance, a less than substantial impact upon its setting would result in a very limited impact, which may require only a very low level of mitigation (Appendix 1, Table 3).

4.4.3 Cartographic evidence shows that the proposed development site remained relatively unaltered throughout the post-medieval period, with no known structures ever existing within the site boundary. References to the area as common and moorland allow the assumption that no development of the site was undertaken in medieval times. However, there is a potential for earlier activity which cannot be ruled out. Below ground archaeological intervention in close proximity to the site predominantly found traces of post-medieval activity, with sparse medieval archaeological remains.

There is therefore the potential for further, thus far unknown, below ground archaeology, to survive.

5 BIBLIOGRAPHY

5.1 Primary Sources

CCAC DRC/8/57 Plan of the Township of Cummersdale in the parish of Saint Mary 1841

CCAC QRE/1/90 Enclosure Map and Award of Cummersdale 1770

CCAC CA/5/2/93 Deeds of Kell House 1774-1821

CCAC DX 2369/6 Plan of Mr Wilson Estate Kell House

Greenwood C 1823 Map of Cumberland

First Edition Ordnance Survey Map 1897 25 inch to 1 mile

Third Edition Ordnance Survey Map 1972 1:2500

Mannix and Whellan Directory of Cumberland 1847

Kelly's Directory 1897

Bulmer's Directory 1901

5.2 Secondary Sources

Bassetlaw District Council 2011, *A Guide to Heritage Impact Assessments*

Carlisle City Council 2016, *Carlisle District Local Plan*, Carlisle City Council: Carlisle

CifA 2014, *Standard and guidance for historic environment desk-based assessment*, CifA: Reading

Cumbria County Council 2009, *Cumbria Historic Landscape Characterisation*

DCLG 2014, *Technical Guidance to the National Planning Policy Framework*, Department of Communities and Local Government: London

DEFRA 1997, *The Hedgerow Regulations 1997: A Guide to the Law and Good Practice*, Department of the Environment, Transport and the Regions: London

Highway Agency 2007, *Design Manual for Roads and Bridges*

Historic England 2015, *The Setting of Heritage Assets*, English Heritage: London

Historic England 2017, *Understanding Place: Historic Area Assessments in a Planning and Development Context*, English Heritage: Swindon

Hutchinson W 1794, *The History of the County of Cumberland, 2*, Carlisle

Mills A D 2003, *Oxford Dictionary of British Place Names*, Oxford

MHCLG 2019, *National Planning Policy Framework*, Ministry of Housing, Communities and Local Government: London

Pearson E 2016, *Land at Newby West, Carlisle, Cumbria: Programme of archaeological investigation*. Cirencester: Cotswold Archaeology

Whellan W 1860, *History and Topography of Cumberland and Westmoreland*

Internet Sources

BGS 2019, <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>, accessed 6th October 2019

NHL 2019, <https://historicengland.org.uk/listing/the-list/map-search?clearresults=true>, accessed 6th October 2019

PastScape 2019, <https://pastscape.org.uk>, accessed 7th October 2019

Roman Roads 2019, <http://www.romanroads.org/gazetteer/cumbria/M75.htm>, accessed 7th October 2019

Cummersdale History 2019, <http://www.cummersdalehistory.co.uk/the-history.html>, accessed 7th October 2019

APPENDIX 1: HERITAGE IMPACT ASSESSMENT TABLES

Table 1 Measuring Significance

Significance	Designation	Asset types and justification	Preferred response to negative impact
International	Non-statutorily designated heritage assets	World Heritage Site (NPPF s194)	Avoid negative impact where asset contributes to the WHS's defined outstanding universal values (NPPF s201)
National	Statutorily designated heritage assets	Scheduled monuments, grade I and II* listed buildings (NPPF s194). Grade A Listed Buildings in Scotland	Avoid negative impact
National	Non-statutorily designated heritage assets	Registered battlefields, grade I and II* Registered Parks and Gardens (NPPF s194)	Avoid negative impact
National	Non-designated heritage assets of demonstrable equivalence to a scheduled monument (NPPF s138)	Assets where assessment for designation is pending, assets that have been assessed as being capable of designation but have not been designated at the SoS discretion, assets worthy of designation but which are outside the scope of the 1979 Act (NPPF s194)	Avoid negative impact
District or County (Higher)	Statutorily designated heritage assets	Grade II listed buildings (NPPF s194). Grade B Listed Buildings in Scotland	Limit negative impact (avoid substantial harm) and mitigate
District or County (Higher)	Non-statutorily designated heritage assets	Conservation area (NPPF s186), grade II registered park and garden (NPPF s194)	Limit negative impact (avoid substantial harm) and mitigate
District or County (Lesser)	Non-designated heritage assets within a national park or AONB	Any extant heritage assets (NPPF s172)	Limit negative impact and mitigate
District or County (Lesser)	Non-designated heritage assets	Heritage assets placed on a local planning authority list (NPPG). Grade C Listed Buildings in Scotland	Limit negative impact and mitigate
District or County (Lesser)	Non-designated heritage assets	Any area of potential listed in a local plan (NPPG)	Limit negative impact and mitigate
District or County (Lesser)	Non-designated heritage assets	Historic Hedgerow as defined under the Hedgerow Regulations 1997	Limit negative impact and mitigate
Local	Non-designated heritage assets	Any extant heritage assets outside of a national park or AONB.	Mitigate
Negligible	Non-designated heritage assets	Heritage assets recorded in the HER that are no longer extant, individual findspots or structures of no heritage value	No action

Table 2: Establishing the Magnitude of Impact

Magnitude of Impact	Heritage Asset		
	Archaeological Remains (Archaeological Interest)	Historic Buildings (Architectural/Artistic Interest and/or Historic Interest)	Historic Landscapes (Historic Interest)
Loss	<ul style="list-style-type: none"> Change to most or all key archaeological materials, such that the resource is totally altered Comprehensive changes to setting 	<ul style="list-style-type: none"> Change to key historic building elements, such that the resource is totally altered Comprehensive changes to setting 	Major change to historic landscape character resulting from: <ul style="list-style-type: none"> Changes to most key historic landscape elements, parcels or components Extreme visual effects Major change to noise or change to sound quality Major changes to use or access
Substantial	<ul style="list-style-type: none"> Changes to many key archaeological materials, such that the resource is clearly modified Considerable changes to setting that affect the character of the asset 	<ul style="list-style-type: none"> Changes to many key historic building elements, such that the resource is significantly modified Changes to setting of an historic building such that it is significantly modified 	Moderate change to historic landscape character resulting from: <ul style="list-style-type: none"> Changes to many key historic landscape elements, parcels or components Visual change to many key aspects of the historic landscape Noticeable differences in noise or sound quality Considerable changes to use or access
Less than substantial	<ul style="list-style-type: none"> Changes to key archaeological materials, such that the asset is slightly altered Slight changes to setting 	<ul style="list-style-type: none"> Change to key historic building elements, such that the asset is slightly different Changes to setting of an historic building such that it is noticeably changed 	Limited change to historic landscape character resulting from: <ul style="list-style-type: none"> Changes to few key historic landscape elements, parcels or components Slight visual changes to few key aspects of the historic landscape Limited changes to noise levels or sound quality Slight changes to use or access
Minor	<ul style="list-style-type: none"> Very minor changes to archaeological materials 	<ul style="list-style-type: none"> Slight changes to historic buildings elements or setting that hardly affect it 	Very small change to historic landscape character resulting from: <ul style="list-style-type: none"> Very minor changes to key historic landscape elements, parcels or components Virtually unchanged visual effects Very slight changes to noise levels or sound quality Very slight changes to use or access
No change	No change		

Table 3 Impact on Heritage Significance

Assessment Matrix to define the degree of impact on heritage asset significance		Magnitude of impact				
		No change	Minor alteration with no reduction in significance	Less than substantial	Substantial	Loss
Significance of Heritage Asset	National	Blue	Yellow	Dark Green	Red	Red
	District/County (Higher)	Blue	Yellow	Light Green	Dark Green	Red
	District/County (Lesser)	Blue	Yellow	Light Green	Light Green	Dark Green
	Local	Blue	Blue	Yellow	Light Green	Light Green
	Negligible	Blue	Blue	Blue	Blue	Blue

Blue (no appreciable impact) = no mitigation necessary
 Yellow (very limited impact) = low level mitigation eg photographic record/watching brief etc
 Light green (limited impact) = may need evaluation to establish appropriate mitigation which may include site survey/excavation etc
 Dark green (major impact) = may not be agreed and then only with significant justification, may require evaluation and will require significant mitigation such as excavation, detailed building survey, visual restoration, some in-situ preservation and on-site interpretation
 Red (very major impact) = unlikely to be agreed except in exceptional circumstances and only with a high level of mitigation

APPENDIX 2: LIST OF HERITAGE ASSETS

The table below summarises known heritage assets within the 800m search radius (study area), including assets from the Cumbria Historic Environment Record (HER), PastScape (PS) and National Heritage List (NHL) web resources.

Asset No.	Reference	Site Name	Description	Grid Reference	Significance
1	NHL 1372269	Bunkershill Centre House, East End, West End	Grade II listed House and stables, now 3 dwellings. Probably 1797 for John Milbourn.	336774,554673	District or County (Higher)
2	NHL 1335631	Dovecote north of Bunkershill	Grade II listed Former Dovecote. Late C18 or early C19. Mixed river cobbles and red sandstone rubble, graduated Welsh slate roof and glover. 2 storeys, circular plan. Plank doors on ground floor and loft to rear. Roof re-slatted in early 1970s, glover with louvred wooden slats. Interior retains its original brick boulins for approximately 500 nests.	336716,554733	District or County (Higher)
3	NHL 1218967 HER 41716	Suttle House	Grade II listed House. Late C18 with later alterations and additions. Flemish bond handmade brickwork. Graduated greenslate roof, hipped on extension; end brick chimney stacks. 2 storeys, 3 bays, with left facing-gable single-bay extension. Ruinous state, proposed for demolition.	337637,554285	District or County (Higher)
4	NHL 1197153	Milestone outside Suttle House	Grade II listed Milestone. Early C19 for the Carlisle to Cockermouth turnpike. Red sandstone with rounded top and curved face (formerly whitewashed), rectangular metal plate attached to front inscribed on 6 lines: CARLISLE 2 MILES/ WIGTON 9 MILES/ COCKERMOUTH 24 1/2 MILES.	337710,554244	District or County (Higher)

Asset No.	Reference	Site Name	Description	Grid Reference	Significance
5	NHL 1335492	Newby West Farmhouse and Barn	Grade II listed Farmhouse and barn. Early C19. Flemish bond brick walls, slate roof and gables, brick chimney stacks. 2 storeys, 3 bays.	336792,553861	District or County (Higher)
6	NHL 1087741	Maxwell Cottage	Grade II listed Early C19. Mixed red and yellow sandstone, slate roof, brick chimney stacks. Two storeys, three bays. C20 porch of pebble-dashed brick with wooden upper structure.	336804,553911	District or County (Higher)
7	NHL 1297280, HER 44525	Morton Cottage	Grade II listed House, at one time a farmhouse and adjoining barn. Mid C18 with late C18 and early C19 alterations. This is marked as Morton Cottage on Hodskinson & Donalds' Map of Cumberland, surveyed 1770-1.	337902,554610	District or County (Higher)
8	HER 469	Stone Axe Find	A rather degenerate type of the Cumbrian club type. Faceted lateral edges, butt edge completely broken off but was probably square ended.	337700,555100	Negligible
9	HER 10087	Thursby Roman Road	Site of a length of Roman road. Cobbling interpreted as belonging to the road was found on land at Morton during an evaluation excavation in 2011-12.	334110,551090	Local
10	HER 19236	Coin Find Belle Vue	An AR penny of Edward I (1272-1307) dated c.1307 and was minted in London. The coin was found in a garden at Belle Vue South c.1970.	337000,555000	Negligible
11	HER 41380	Newhouse Farm	Mid C18th farmhouse, at least partly constructed in brick, with stone flagged roof on western elevation and slate on eastern elevation and three brick chimneys. A barn to south east corner of farm courtyard is partially constructed of clay with a full cruck surviving internally and with tin roof, which may have originally been thatched. Northern range of buildings C19 brick stables, byres and hay barns.	337060,554440	Local

Asset No.	Reference	Site Name	Description	Grid Reference	Significance
12	HER 44365	Enclosure North of Broomhills	A rectilinear enclosure of medieval or post medieval date and an adjacent post medieval field defined by ditched field boundaries are visible as earthworks on historical air photos. The enclosure is defined by a broad ditch and resembles a moated site. Some faint traces of the field boundaries are visible on lidar imagery but most features appear to have been levelled.	336230,554590	Local
13	HER 44366	D-shaped enclosure south of Broomhills	A D-shaped cropmark that may indicate the buried ditches of an enclosure is visible on air photos. An enclosure of this shape might be of Iron Age or Roman date but it is far from certain that these marks are of archaeological origin.	336360,554250	Local
14	PS 1592941	Field boundary earthwork	Post medieval and/or a field boundary are visible as earthworks on historical air photos. The lidar imagery indicates that most of these remains have now been levelled.	337532,554764	Local
15	PS 1592955	Ridge and furrow	A small patch of possible medieval ridge and furrow and a block of medieval or post medieval ridge and furrow are visible as earthwork on historical air photos. These remains have now been built over.	337526,554971	Local
16	PS 1592953	Ridge and furrow	Two blocks of post medieval narrow ridge and furrow are visible as earthworks on historical air photos. The lidar imagery indicates that some but not all of these features survive as earthworks.	337445,554578	Local
17	Tithe Map	Field Boundary	Potentially historic hedgerow under 1997 Hedgerow Regulation, north-east to south-west aligned.		District or County (Lesser)

APPENDIX 3: PLATES

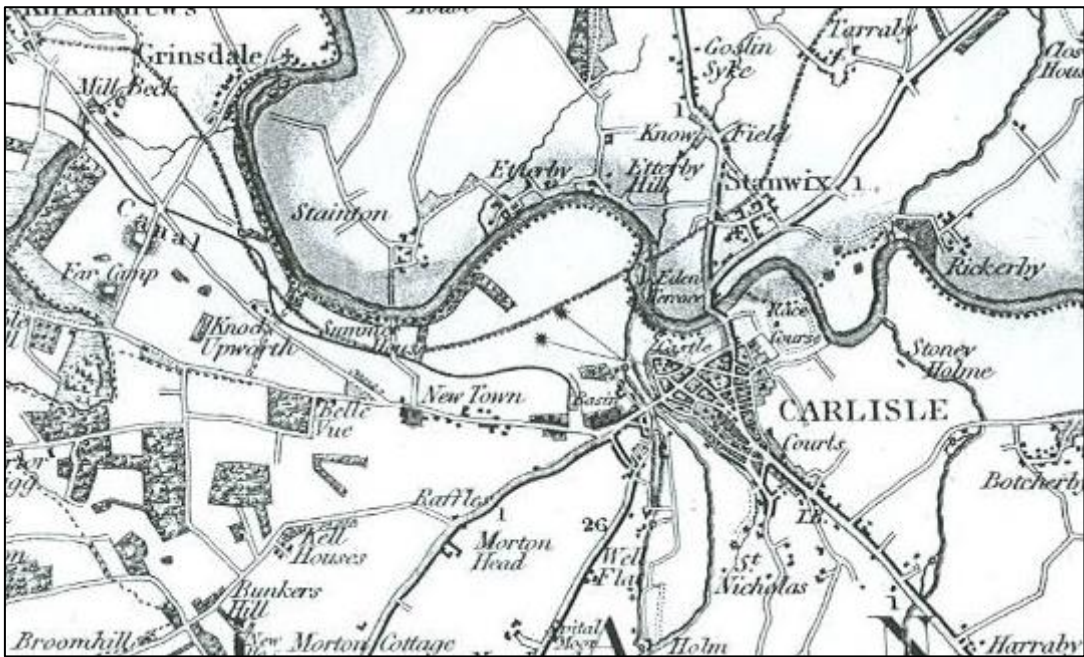


Plate 3: Greenwoods map of 1823



Plate 4: 2018 Google Earth Imagery of site



Plate 5: Access to site from Orton Road



Plate 6: Orton Road towards Bunkershill



Plate 7: Orton Road towards St Edmunds Park

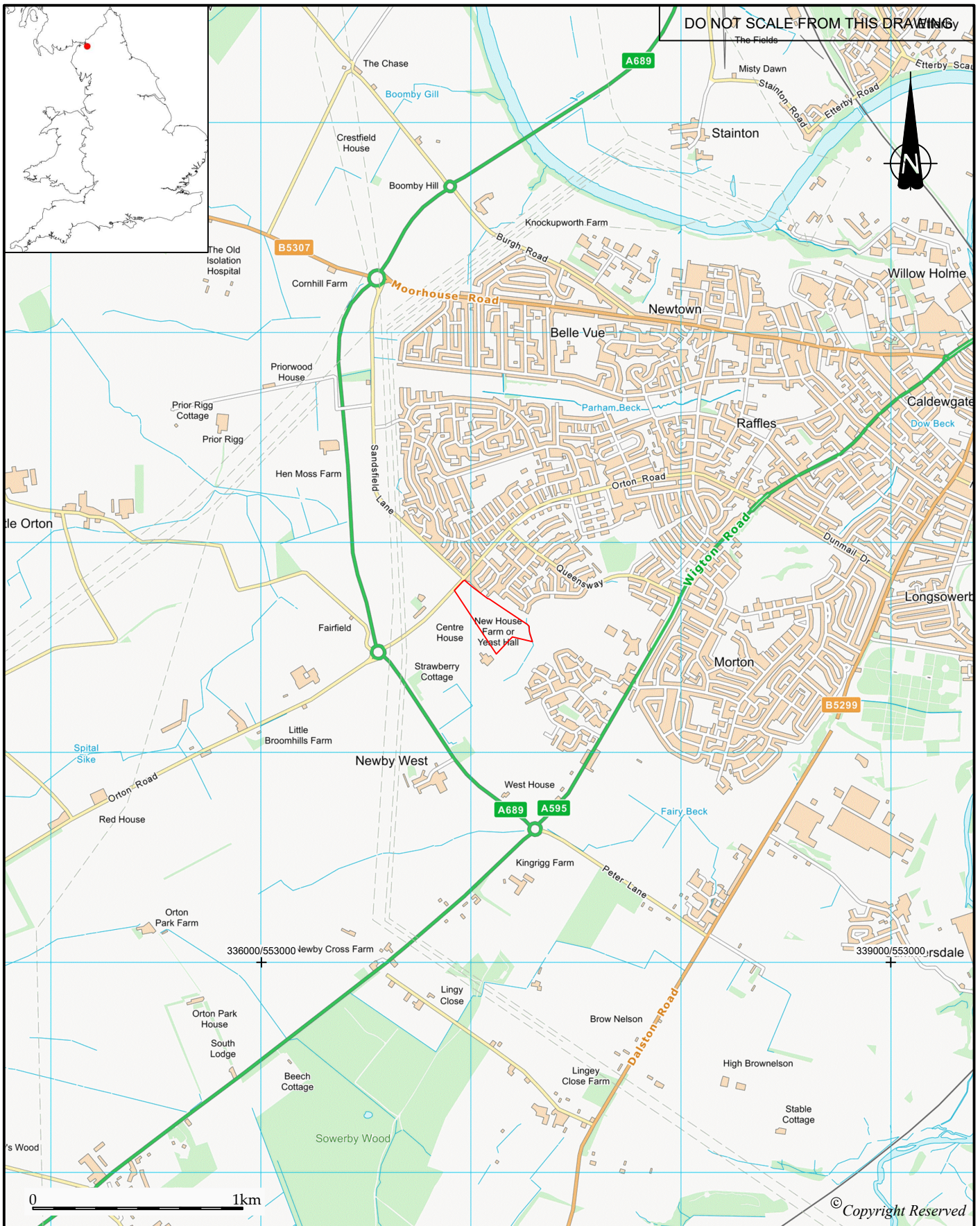


Plate 8: View across the site towards the south-east



Plate 9: Hedgerow bounding site towards St Edmunds Park, possibly kested

APPENDIX 3: FIGURES



DO NOT SCALE FROM THIS DRAWING

CLIENT	Persimmon Homes and Charles Church Lancashire
--------	---

DRG No.	CL12337-001	REV	A
---------	-------------	-----	---

DATE	November 2019
------	---------------

PROJECT	Land at Orton Road, Carlisle, Cumbria
---------	---------------------------------------

SIZE	A4	SCALE	1:25,000
DRAWN BY	HP	CHECKED BY	EJ

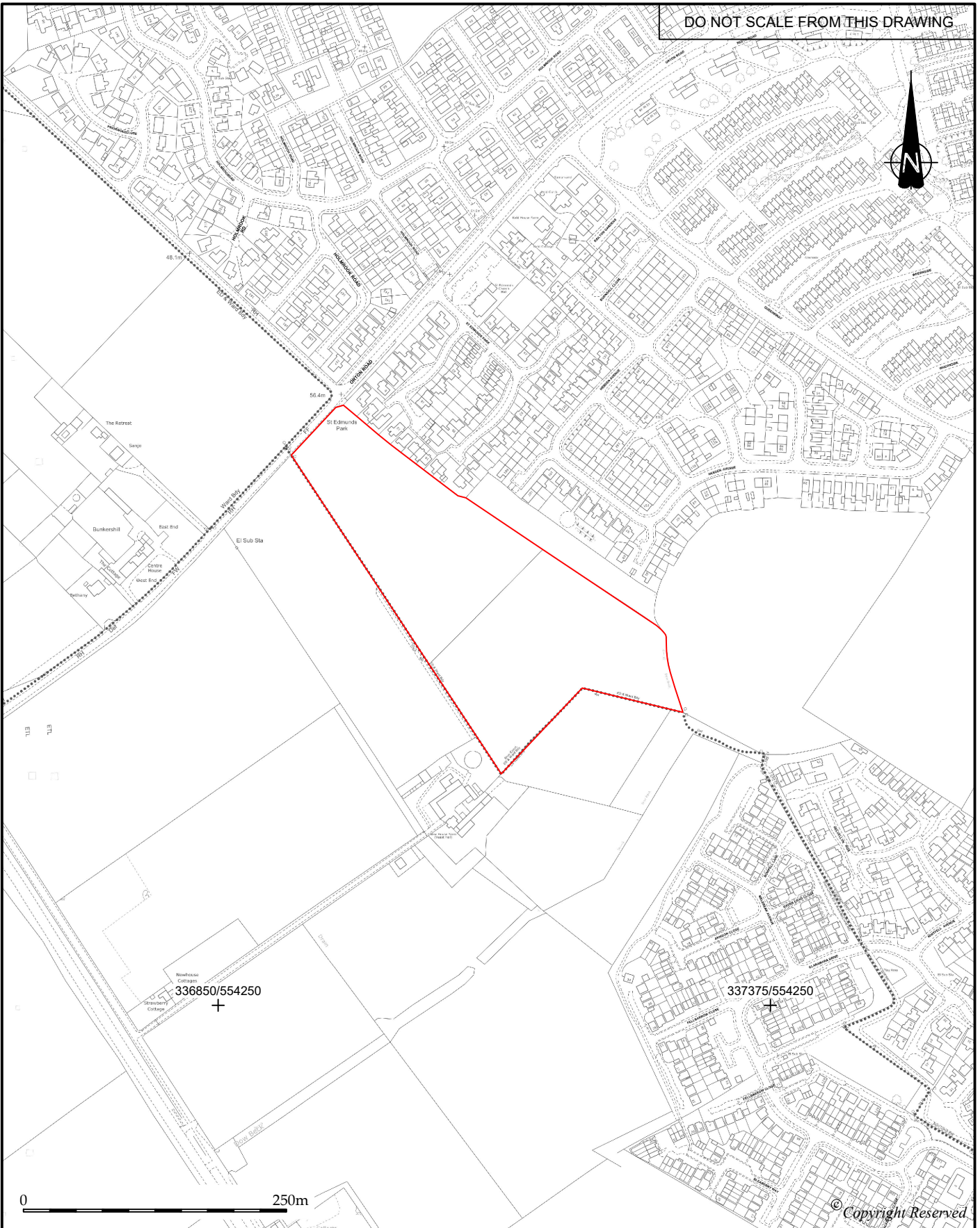
APPROVED BY	FG
-------------	----

DRAWING TITLE
Figure 1: Site location



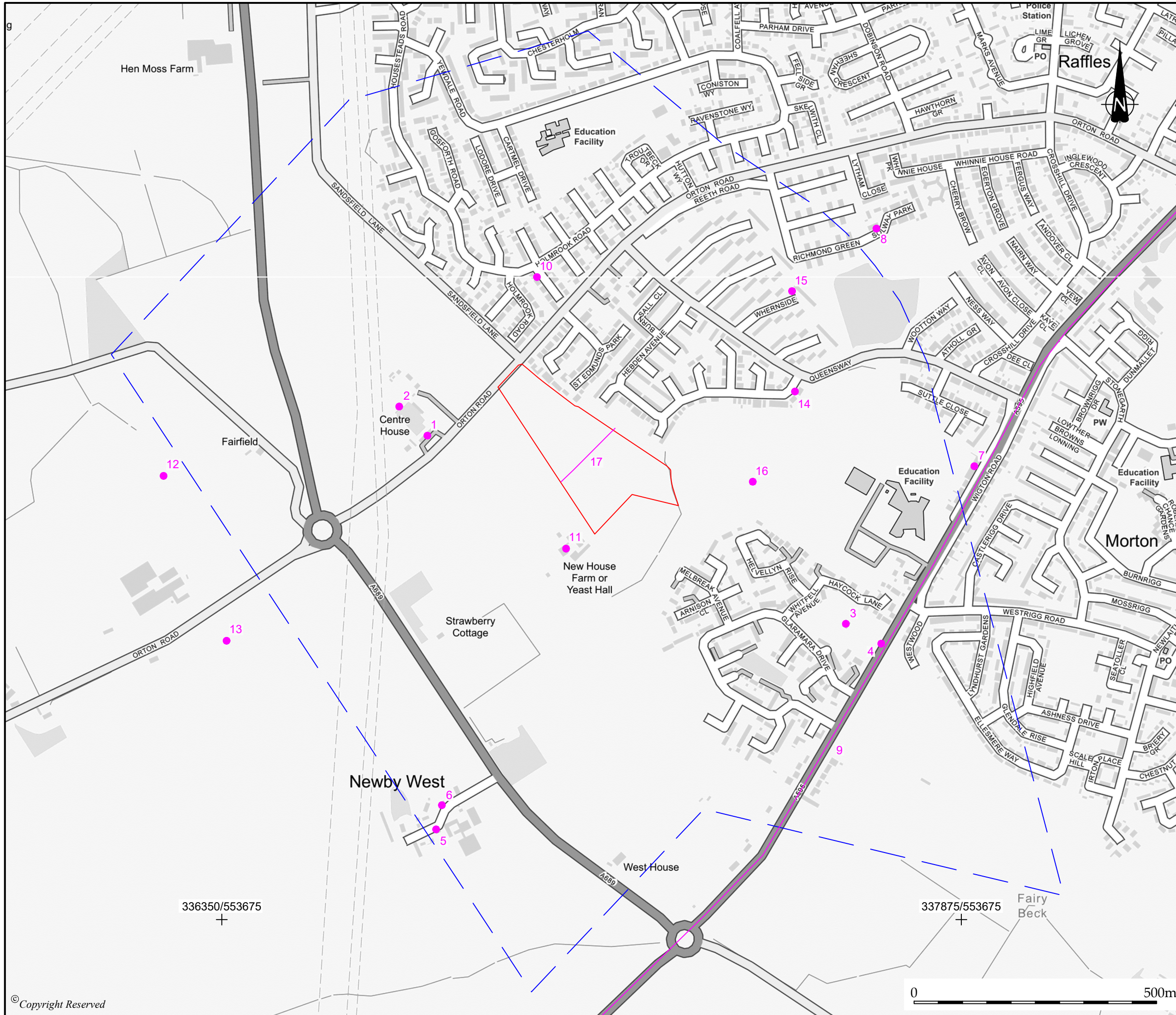
CARLISLE | TEL 01228 550 575
 WWW.WARDELL-ARMSTRONG.COM
 BIRMINGHAM LEEDS
 BOLTON LONDON
 CARDIFF MANCHESTER
 EDINBURGH NEWCASTLE UPON TYNE
 GLASGOW STOKE ON TRENT

DO NOT SCALE FROM THIS DRAWING




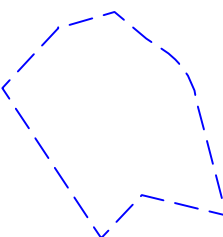

© Copyright Reserved

CLIENT Persimmon Homes and Charles Church Lancashire	DRG No. CL12337-002		REV A
	SIZE A4	SCALE 1:5,000	DATE November 2019
PROJECT Land at Orton Road, Carlisle, Cumbria	DRAWN BY HP	CHECKED BY EJ	APPROVED BY FG
	DRAWING TITLE Figure 2: Detailed site location		
		■ CARLISLE TEL 01228 550 575 WWW.WARDELL-ARMSTRONG.COM	
		<input type="checkbox"/> BIRMINGHAM <input type="checkbox"/> LEEDS <input type="checkbox"/> BOLTON <input type="checkbox"/> LONDON <input type="checkbox"/> CARDIFF <input type="checkbox"/> MANCHESTER <input type="checkbox"/> EDINBURGH <input type="checkbox"/> NEWCASTLE UPON TYNE <input type="checkbox"/> GLASGOW <input type="checkbox"/> STOKE ON TRENT	



DO NOT SCALE FROM THIS DRAWING

KEY:

-  Site boundary
-  800m study area
-  Heritage assets

REVISION	DETAILS	DATE	DRN	CHKD	APPD
----------	---------	------	-----	------	------

CLIENT
Persimmon Homes and Charles Church Lancashire

PROJECT
Land at Orton Road, Carlisle, Cumbria

DRAWING TITLE
**Figure 3:
 Location of heritage assets
 within 800m study area**

DRG No.	CL12337-003	REV	A
DRG SIZE	A3	SCALE	1:7,500
DATE	Nov 2019	DRAWN BY	HP
CHECKED BY	EJ	APPROVED BY	FG

wardell armstrong

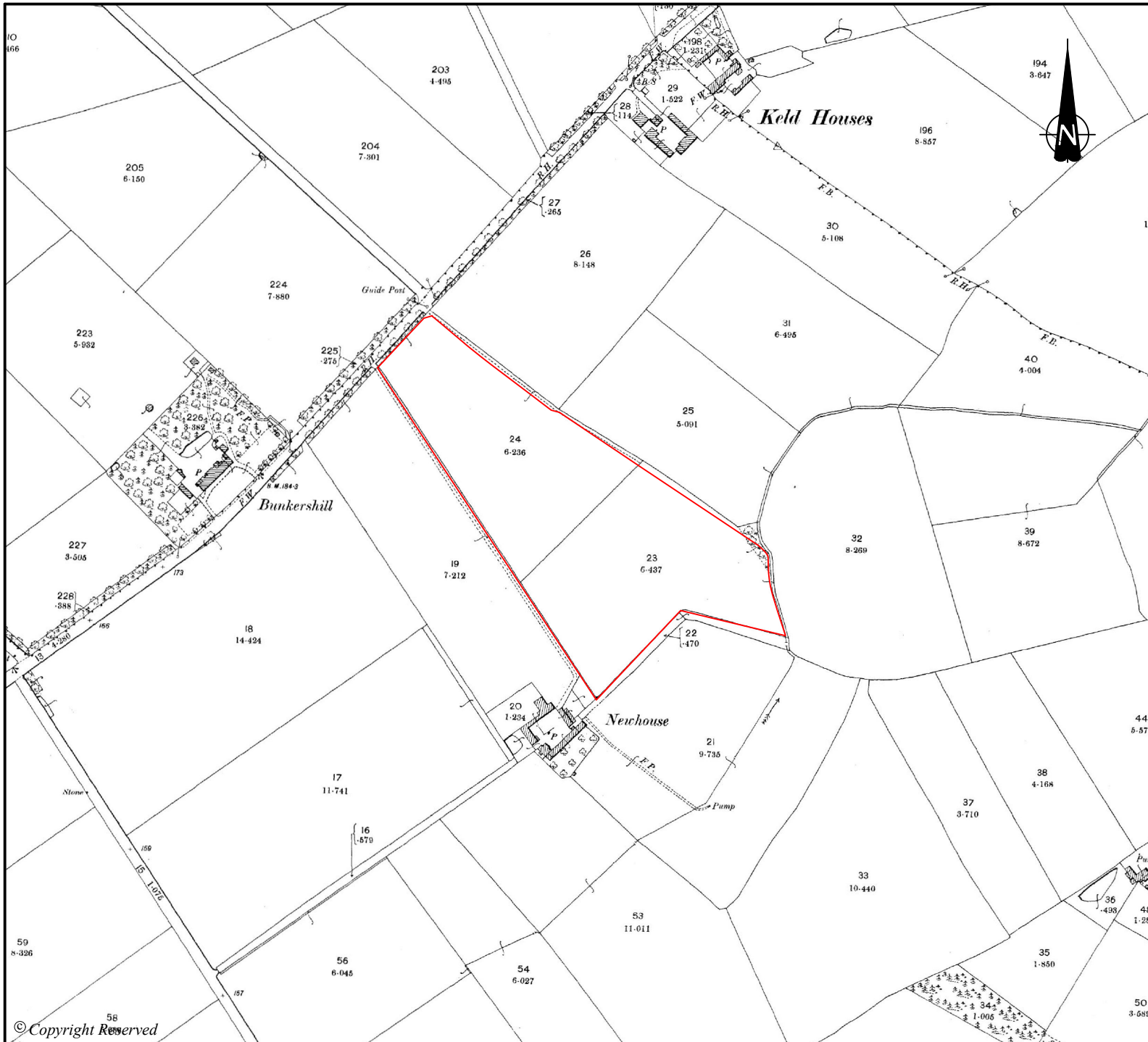
■ CARLISLE | TEL 01228 550 575
 WWW.WARDELL-ARMSTRONG.COM

- BIRMINGHAM
- LEEDS
- BOLTON
- LONDON
- CARDIFF
- MANCHESTER
- EDINBURGH
- N-J-T
- GLASGOW
- STOKE ON TRENT



© Copyright Reserved

CLIENT Persimmon Homes and Charles Church Lancashire	DRG No. CL12337-004		REV A
	SIZE A4	SCALE 1:5,000	DATE November 2019
PROJECT Land at Orton Road, Carlisle, Cumbria	DRAWN BY HP	CHECKED BY EJ	APPROVED BY FG
	DRAWING TITLE Figure 4: Plan of the Township of Cummersdale in the parish of Saint Mary, 1841		
		■ CARLISLE TEL 01228 550 575 WWW.WARDELL-ARMSTRONG.COM <input type="checkbox"/> BIRMINGHAM <input type="checkbox"/> LEEDS <input type="checkbox"/> BOLTON <input type="checkbox"/> LONDON <input type="checkbox"/> CARDIFF <input type="checkbox"/> MANCHESTER <input type="checkbox"/> EDINBURGH <input type="checkbox"/> NEWCASTLE UPON TYNE <input type="checkbox"/> GLASGOW <input type="checkbox"/> STOKE ON TRENT	



DO NOT SCALE FROM THIS DRAWING

KEY:

Site boundary

REVISION	DETAILS	DATE	DRAWN	CHKD	APPD

CLIENT
 Persimmon Homes
 and Charles Church Lancashire

PROJECT
 Land at Orton Road,
 Carlisle, Cumbria

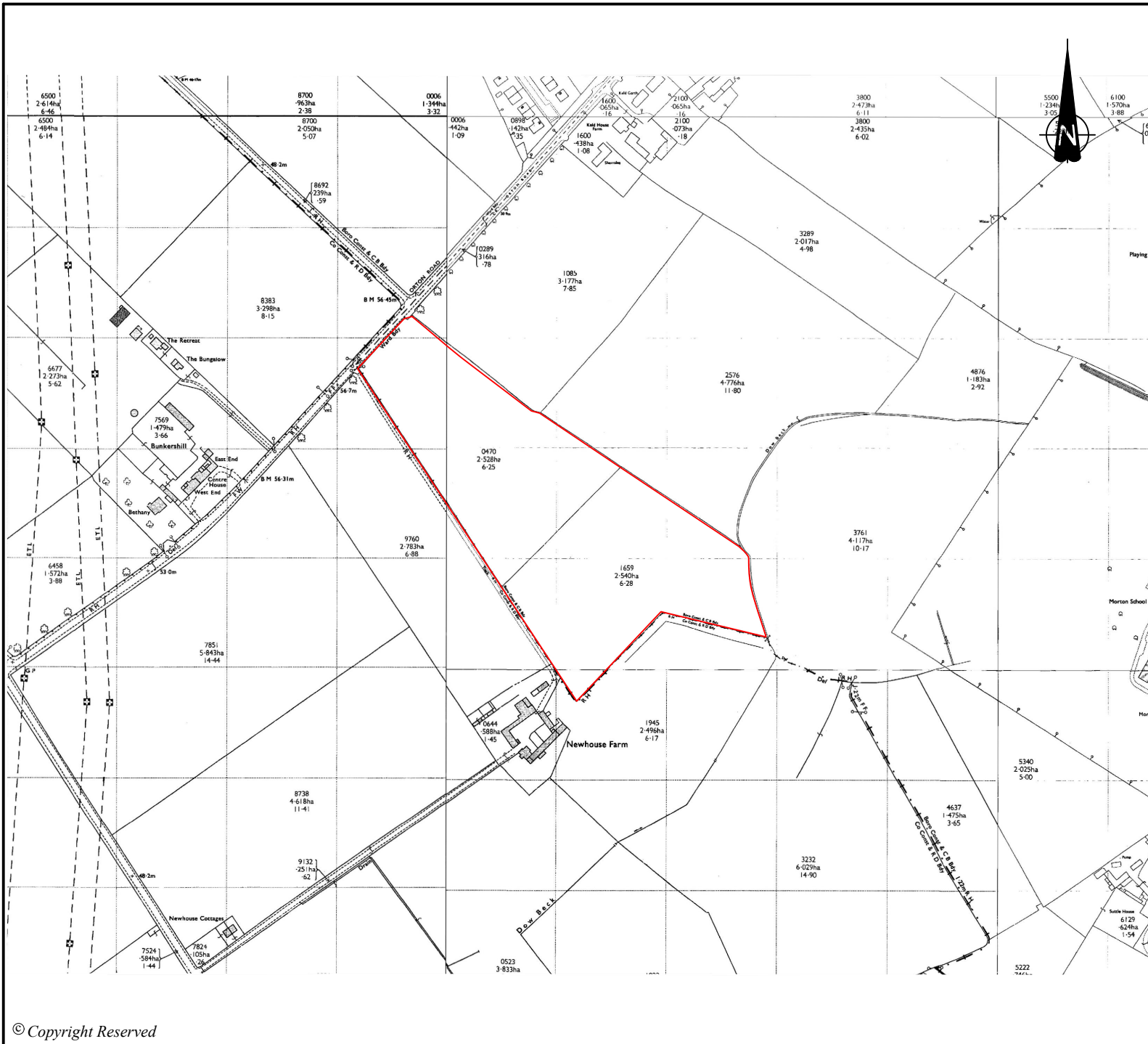
DRAWING TITLE
 Figure 5:
 First Edition Ordnance Survey Map,
 1897 (25 inch to 1 mile scale)

DRG No	CL12337-005	REV	A
SIZE	A4	SCALE	1:5,000
DRAWN BY	HP	CHECKED BY	EJ
		APPROVED BY	FG

■ CARLISLE | TEL 01228 550 575
 WWW.WARDELL-ARMSTRONG.COM

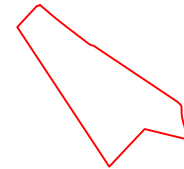
<input type="checkbox"/> BIRMINGHAM	<input type="checkbox"/> LEEDS
<input type="checkbox"/> BOLTON	<input type="checkbox"/> LONDON
<input type="checkbox"/> CARDIFF	<input type="checkbox"/> MANCHESTER
<input type="checkbox"/> EDINBURGH	<input type="checkbox"/> N-U-T
<input type="checkbox"/> GLASGOW	<input type="checkbox"/> STOKE ON TRENT

© Copyright Reserved



DO NOT SCALE FROM THIS DRAWING

KEY:



Site boundary

REVISION	DETAILS	DATE	DRAWN	CHKD	APPD

CLIENT
**Persimmon Homes
 and Charles Church Lancashire**

PROJECT
**Land at Orton Road,
 Carlisle, Cumbria**

DRAWING TITLE
**Figure 6:
 Third Edition Ordnance Survey Map,
 1972 (1:2500 scale)**

DRG No	CL12337-006	REV	A
SIZE	A4	SCALE	1:5,000
DRAWN BY	HP	CHECKED BY	EJ
		APPROVED BY	FG


 ■ CARLISLE | TEL 01228 550 575
 WWW.WARDELL-ARMSTRONG.COM

<input type="checkbox"/> BIRMINGHAM	<input type="checkbox"/> LEEDS
<input type="checkbox"/> BOLTON	<input type="checkbox"/> LONDON
<input type="checkbox"/> CARDIFF	<input type="checkbox"/> MANCHESTER
<input type="checkbox"/> EDINBURGH	<input type="checkbox"/> N-U-T
<input type="checkbox"/> GLASGOW	<input type="checkbox"/> STOKE ON TRENT

© Copyright Reserved

STOKE-ON-TRENT

Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)1782 276 700

BIRMINGHAM

Two Devon Way
Longbridge Technology Park
Longbridge
Birmingham
B31 2TS
Tel: +44 (0)121 580 0909

BOLTON

41-50 Futura Park
Aspinall Way
Middlebrook
Bolton
BL6 6SU
Tel: +44 (0)1204 227 227

CARDIFF

Tudor House
16 Cathedral Road
Cardiff
CF11 9LJ
Tel: +44 (0)292 072 9191

CARLISLE

Marconi Road
Burgh Road Industrial Estate
Carlisle
Cumbria
CA2 7NA
Tel: +44 (0)1228 550 575

EDINBURGH

Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GLASGOW

2 West Regent Street
Glasgow
G2 1RW
Tel: +44 (0)141 433 7210

LEEDS

36 Park Row
Leeds
LS1 5JL
Tel: +44 (0)113 831 5533

LONDON

Third Floor
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)207 242 3243

MANCHESTER

76 King Street
Manchester
M2 4NH
Tel: +44 (0)161 817 5038

NEWCASTLE UPON TYNE

City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0)191 232 0943

TRURO

Baldhu House
Wheal Jane Earth Science Park
Baldhu
Truro
TR3 6EH
Tel: +44 (0)187 256 0738

International offices:

ALMATY

29/6 Satpaev Avenue
Regency Hotel
Office Tower
Almaty
Kazakhstan
050040
Tel: +7(727) 334 1310

MOSCOW

21/5 Kuznetskiy Most St.
Moscow
Russia
Tel: +7(495) 626 07 67