

Proposed Main Modifications (March 2016)

Consultation Representation Form



Images courtesy of Andrew Paterson, D&H Photographers and Jason Friend

INSTRUCTIONS

The Carlisle District Local Plan Schedule of Main Modifications, arising from the recent Examination in Public, includes a series of changes to the published Carlisle District Local Plan 2015-2030. These suggested changes are being consulted on for a period of six weeks. **For advice on how to respond to the consultation, and how to fill in this form, please see the accompanying guidance note on the Council's website at <http://www.carlisle.gov.uk/planning-policy>**

Please note all representations must be received by no later than **17:00 on Monday 25th April 2016**. There are no guarantees that any representations received after this deadline can be accepted.

For all representations parts one and two of this form should be completed. Please use a separate form for each Proposed Main Modification that you wish to comment on. It is important that your responses relate only to the Proposed Main Modifications or any associated Sustainability Appraisal or Habitat Regulation Assessment matters. Representations relating to other parts of the Plan will not be considered.

A copy of the Schedule of Main Modifications and all supporting documentation, including the Sustainability Appraisal and Habitat Regulation Assessment Addendums , are available to view at <http://www.carlisle.gov.uk/planning-policy>

How to respond –

Via email: lpc@carlisle.gov.uk

In writing:

Investment and Policy
Carlisle City Council
Civic Centre
Carlisle
Cumbria
CA3 8QG

To find out more Call: 01228 817569

PART ONE- YOUR DETAILS

It is important that you fill in your contact details below; **we cannot register your representation without your details**. Please note that we will not be able to keep your representation or personal details confidential. We may also wish to contact you to clarify your representation.

In circumstances where there are individuals / groups / organisations who share a similar view on the Proposed Main Modifications, it would be helpful if these could make a single representation. It would also be useful if, in such circumstances, you

state how many people/groups the submission is representing and how the representation was authorised.

Your Details	Your Agent's Details (If applicable)
Title: Mr & Mrs	Title:
Surname: Ingham	Surname:
Forename: David & Judith	Forename:
Organisation/Company:	Organisation/Company:
Address: 124 Scotby Rd Scotby Carlisle Postcode: CA4 8BJ	Address: Postcode:
	Contact No:
	Email:
Signature:	
Date: 23/04/2016	
Please tick if you are not already on our mailing list but would like to be kept updated on the progress of the Local Plan	

PART TWO - YOUR REPRESENTATION

Please use a separate form for each Proposed Main Modification that you wish to comment on. It is important that your responses only relate to the main modifications and not to other parts of the Plan.

Q1. Please give the Proposed Main Modification reference your comment relates to
Main Modification reference – MM 39 and MM01,04

Q2. Do you consider that the Proposed Main Modification to the Local Plan addresses the following in relation to the policy(s) concerned;
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Legally Compliant?		
Yes		
Sound?		
		No

Q3. If you consider the Local Plan remains or is unsound in light of the Proposed Main Modification, is it because it is not:

Positively Prepared - yes

Justified -yes

Consistent with National Policy -yes

Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound in light of the Proposed Main Modification. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your reasoning.

Please note that your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation. After this stage, further submissions will be only at the request of the Inspector.

We believe that the Proposed Main Modifications fail to address our original objections and consequently the Local Plan remains unsound on the grounds that it is not justified against the evidence available,nor does it result in sustainable development in accordance with the NPPF .

We stand by all our previous legitimate planning objections to the scale of housing development proposed for Carlisle and, in particular, to the inclusion of site R15.

We are dismayed that, with the exception of minor amendments to policy details, the impact of the devastating floods in December 2015 on the City appear to have been ignored. Whilst national politicians talked of " lessons must be learnt" the proposed modifications ignore potentially damaging consequences .The cumulative impact of the scale of development proposed in the Main Modifications will only increase the vulnerability of the City to further future flooding since the existing and proposed infrastructure is incapable of accommodating the future scale of development.

Taken together MM01 and MM04 recommend an increase in the supply of new homes in order not to constrain economic growth and that "job growth is expected to be stronger past 2020 . " There is absolutely no evidence to suggest the assertion that the housing supply is constraining economic growth ,nor that job growth is expected to be stronger post 2020. This is pure conjecture and is not even supported by any valid assumptions. Indeed based on what little evidence is available, the number of people in employment is expected to drop by about 830 between 2013 and 2030, based on the 2013 SNPP (Strategic HM Assessment update Sept 2014). The modelled increase in employment rates is mainly explained by an expected rise in pensionable age, not population growth . Equally the projected increase in households identified in the SHMA is contradicted by both the ONS and CLG statistics.

We would draw your attention to the valid planning reasons already stated into why we believe an inclusion of R15 is not justified. We do not intend to reiterate the arguments but firmly believe that the process by which this site has been included, then rejected, then included again ,and then extended during the Local Plan procedure has been erroneous. It would appear to be a legitimate case for the Local Government Ombudsman to adjudicate on. Whilst the relevant regulations may or may not have been properly followed, in no way has the local community been kept aware of the numerous proposed changes to this site .

If the Consultation Statement is genuine that a "meaningful engagement and collaboration with neighbourhoods is essential" then the Plan needs to revisit how these two sites have been dealt with. Despite the range of communication methods identified in the Consultation Statement, we are not aware of any community involvement or engagement regarding the specific inclusion of the R15 extension site . We would be surprised if any of the residents adjoining the northern extension of Site R15 are aware of the proposals.

The proposed modification MM39 to include land to the north of site R15 fails to explain how the Highway Authority's "significant concerns about the spacing between the proposed site access to the junction with the A69 " has been overcome. There has been no change in circumstances to a year ago when the objections were deemed a "showstopper".

As a Main Modification identified as "having a potentially significant effect," the almost doubling of this proposed development site needs to be properly advertised to the local community and the treatment of this whole area reconsidered. In previous assessments R15 was excluded from the Plan as not being required as the land to the North of this site was deemed more sustainable than R15. Now both sites are proposed for development. Transparency is needed here as the process does not look good.

Q5. Please set out what alternative/additional change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward suggested revised wording. Please be as precise as possible:

Remove R15 and the various site options around it, which will also help reduce the housing target to a more justifiable evidence based total .

Q6. Do you have any comments on the supporting documents, such as the Sustainability Appraisal Addendum or the Habitats Regulations Assessment Addendum?

We strongly object to the findings of the Sustainability Appraisal Addendum. The Addendum reads like a retro-fit document to justify the inclusion of Option 3 ,rather than a key process to inform decision making. Its findings are both inaccurate and illogical . The assertion that almost doubling the size of a greenfield site on the edge of open countryside will result in a more sustainable development cannot be accepted as a logical conclusion. Equally the assertion that it will "provide the opportunity for a more creative design of the development to reduce and negative impacts on neighbouring properties" is an unconvincing argument . Not only will more residential properties be negatively affected but a creative design should be entirely achievable within the existing 2.4 hectare site.

We cannot accept that an objectively based Sustainability Appraisal can conclude that Option 3 performs largely neutral against the SA criteria. The assessment against each objective simply does not stack up.

- Options 2 and 3 score neutral against Objective 4 ,yet the Environment Agency states "there are drainage issues on the site". How can this be?

- The Options are deemed neutral against " encouraging urban regeneration" when it is clear that facilitating greenfield development will reduce the attractiveness of existing brownfield sites to developers and make investment in these more difficult sites unlikely .Furthermore increasing the housing supply will reduce investment in the more marginal inner city housing stock which is in need of regeneration.

- R15 will not result in an " increase in the availability and use of sustainable transport" but will generate more traffic along the already congested City approach . Air pollution, mainly from traffic fumes, is responsible for cutting short around 40,000 lives nationally each year. The Carlisle Transport Improvement Study Feb 2015 states there are no strategic highway route

improvements planned for the eastern outskirts of Carlisle. There is no cycleway provision into Carlisle from Scotby along the dangerous trunk road and there are no County Council plans for improvement. The bus service has deteriorated considerably in the last year, despite significant new housing developments in Scotby over the same period.

- Similarly the positive scores for Objective 11 and 12 in terms of encouraging healthy lifestyles through sustainable means of transport and sustainable lifestyles, don't bear objective scrutiny.

- Again a neutral score for Objective 15 " aimed at protecting and enhancing bio diversity" is illogical given it is a greenfield site with trees ,hedgerows, wildlife and ecosystems which would be concreted over .

- A neutral score for Objective 16 "preserving and enhancing the quality and distinctiveness of landscapes" seems perverse and is simply wrong. This would be a major extension of the village into open countryside and would result in the loss of, relatively scarce in Cumbria, grade 2 agricultural land . It questions the validity and objectivity of the whole sustainability exercise.

- Neutral scores for Objectives 18 and 19 are equally questionable and a positive score for Option 3, on Objective 3, in reducing environmental nuisance is illogical. The assertion that "housing is unlikely to exert an adverse impact on any adjoining land use " is simply not true. Ninety or so houses would adversely affect the residential amenities of the adjoining neighbours by reason of visual intrusion, noise,light ,traffic disturbance and emissions.

We believe there is a major question mark over the veracity and objectivity of the Sustainability Appraisal for this site and contend that there are far more sustainable sites which should be considered for development first ,before this agricultural land on the edge of open countryside.

Q7. Any issues raised on the Main Modifications will be considered as written representations by the Inspector. Further hearing sessions will only be scheduled exceptionally. However please indicate whether you wish to appear at an examination hearing session if necessary?

Yes		
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**Thank you for your time to complete and return this Representation form.
Please keep a copy for future reference.**