



The Carlisle District Local Plan 2015-2030

Proposed Submission Draft Consultation Representation Form



CARLISLE
CITY COUNCIL



www.carlisle.gov.uk



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

INSTRUCTIONS

Before you start, you are advised to read the Guidance Note published separately alongside this form.

Please note all representations must be received by no later than Monday **20th April 2015**. 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. Should you wish to make more than one representation, please fill in and submit a separate form for each.

A copy of the Proposed Submission Draft Local Plan and all supporting documentation is available to view at www.carlisle.gov.uk/localplan

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 plan, it would be helpful if individuals/ groups/ organisations make a single representation. It would also be useful if the group/organisation state how many people the submission is representing and how the representation was authorised.

Your Details	Your Agent's Details (If applicable)
Title: Mr	Title: Mr
Surname:McKnight.	Surname:Greig
Forename:Wayne	Forename:Sam
Organisation/Company:McKnight and Son Builders	Organisation/Company:Taylor and Hardy Ltd
Address:McKnight House, Junction Street, Carlisle. Postcode:CA2 5WH	Address:North House, Kingstown, Carlisle. Postcode:CA6 4BY
Contact No:c/o Taylor and Hardy	Contact No:01228 538886
Email:c/o Taylor and Hardy	Email:sam.planners@taylorandhardy.co.uk
Signature: Sam Greig	
Date:08/04/15	
☒ Please indicate if you wish to be updated on the progress of the Local Plan	

PART TWO - YOUR REPRESENTATION

Please use a separate form for each part of the Proposed Submission Draft Local Plan that you wish to comment on.

Q1. To which part of the document does this representation relate?

☒ Policy	☐ Paragraph	☐ Chapter	☐ Figure
--	------------------------------------	----------------------------------	---------------------------------

Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Policy HO1 - Housing Strategy and Delivery.

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☐ Yes ☐ No

Sound?

☐ Yes ☐ Yes, with minor changes ☒ No

Q3. If you consider the Local Plan is unsound, is it because it is not:

- ☐ Positively Prepared?
- ☒ Justified?
- ☐ Effective?
- ☐ Consistent with National Policy?

Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. 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 representation.

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, based on the matters and issues he/she identifies for examination.

I object to the exclusion of my client's site as an extension to the Housing Allocation U2 under Policy HO1 – Housing Strategy and Delivery. A plan identifying my client's land accompanies this response form.

In dismissing my client's site as a prospective extension to allocation U2, I consider that the Council has overstated the significance of the Roman road that borders the western boundary of the site and the Council has an inaccurate perception that the former Roman road forms a landscape feature that cannot be crossed.

The Council has applied a contradictory approach in respect of proposed allocation to the east of Windsor Way (Site U10), which crosses the same former Roman road, thereby weakening the Council's argument against the allocation of my client's land.

I consider that the Council has not properly assessed the positive elements of including my client's land against the perceived landscape impact, the latter of which would, in my view, be negligible.

The positive aspects of including my client's land as an extension of proposed allocation U2 are detailed in my previous correspondence. Copies of the previous representations are attached for ease of reference. The principal benefits include, but are not limited to, the following:

1. The allocation of my client's land would help redress the imbalance associated with the disproportionately lower level of residential land located to the north of the City when compared with the significantly higher level of employment land. This issue was highlighted within the Carlisle Employment Sites Study, dated June 2010, undertaken by DTZ on behalf of Carlisle City Council. This issue was also identified in a report, dated 17th June 2013, from the Director of Economic Development to the Council's Executive titled "Local Plan – Land Allocations" (Report No. ED/14/13);
2. The site is a brownfield site and its inclusion as an allocation would help the emerging Local Plan satisfy the 'core planning principle' in the NPPF to "encourage the effective use of land by reusing land that has been previously developed"; and
3. The emerging Local Plan recognises that to facilitate the delivery of proposed allocations U1/U2 major junction improvements are required onto the A7. In respect of recent planning applications relating to development on California Road (notably 2013/0104), the Highway Authority has identified safety issues regarding the junction of California Road and Kingstown Road, which, in the Highway Authority's view, "lies in the midst of an important signalised traffic junction". The increase in traffic flows along Kingstown Road, which will result as a consequence of allocations U1 and U2 being developed, will exacerbate the existing problems for residents of California Road wanting to access Kingstown Road. Part of my client's land could be used to provide a safe, alternate, means for the residents of California Road to exit California Road, via prospective allocations U1/U2 and the new junction to be formed to serve those developments.

On the basis of the above, it is considered that the Council's decision to discount my client's land as an extension to proposed housing allocation U2 is not justified and that there are significant planning merits in including our client's land as part of allocations U1 and U2.

--

Q5. Please set out what 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 your suggested revised wording of any policy or text. Please be as precise as possible:

My client's land should be included as an extension to proposed allocation U2.

Q6. Do you wish to make any comments on the supporting documents, such as the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan or evidence base?

No

--

Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?

- ☒ **No, I do not wish to participate at the hearing sessions of the examination**
☐ **Yes, I wish to participate at the hearing sessions of the examination**

Q8. If you wish to participate, please outline why you consider this to be necessary:

Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.

--

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