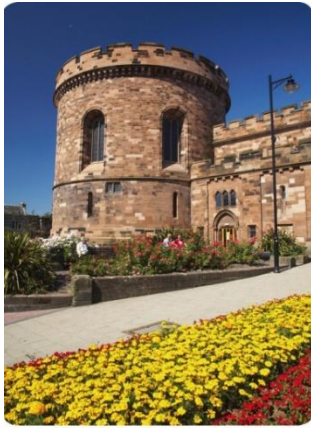




The Carlisle District Local Plan 2015-2030

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: Mrs	Title:
Surname: Templeton	Surname:
Forename: Julie	Forename:
Organisation/Company: Committee Member of Save our Streets	Organisation/Company:
Address: 8 Corporation Road Carlisle Cumbria	Address:
Postcode: CA3 8XB	Postcode:
Contact No:	Contact No:
Email: [REDACTED]	Email:
Signature: [REDACTED]	
Date: 19 th April 2015	
☒ 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
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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Policy SP4, SP2 and Policy SP1

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.

Policy SP4 & SP2

I question the soundness of not putting forward any alternative sites to Rickergate for the expansion of the Primary Shopping Area. I also question why no alternative option was put forward for the retention of the houses in Warwick Street, only two options A and B were shown in the City Centre Draft Development Framework and they both recommended demolition of the houses and business. I do not believe that an adequate explanation has been given for this in the various consultations. This was decided despite the fact that GVA made no attempt to include us in the very early stages of development plans for our area, even though the Rickergate community had been given earlier assurances that their views would be listened to.

The following is an extract from the

Carlisle City Centre Development Framework

13. Area North of Lowther Street including Rickergate

Opportunities/Constraints and Key Issues

13.4 The area is subject to an element of flood risk which will need to be taken into account in assessing future development opportunities. It should be noted however that flood defences are currently in place and these provide a degree of protection to roads and premises in the area.

I do not agree with the above statement (13.4) that seems to downgrade the risk. The Rickergate area is classified as in a high risk flood plain

I note that any new development will undergo sequential tests as to the viability, but question why the Rickergate area was put forward as the principle focus for large scale comparison retail when GVA and the Council would be aware of the flood risk and the possible breach of the flood defences in the long term.

Extract from the National Policy Framework Planning Guidance

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere”.

“Local plans should take account of climate change over the longer term, including factors as flood risk.”

I do not think that the Local Plans adequately address the above NPFP guidance in relation to the preferred option of retail development as an extension of the Primary Shopping area in Rickergate.

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:

Do not concentrate major development in one area, particularly with a risk of flooding, scale the development plans down to make it more sustainable.

Many of the responses from the public to the consultations put forward the case for the development to be spread more evenly throughout the city. Carlisle city centre is not a large city, it can be walked through from one end of the city to the bottom of Botchergate in 15/20 minutes. I do not believe that in such a compact city centre there is a need to concentrate large scale development in just one area. The Rickergate community welcomed the re-use of the old fire station into an Arts Centre and have never been against development, but believe that it should be on a scale suitable to the Conservation area and reflect the fact that it is in a high risk flood area.

I believe that the scale of development plans for Rickergate puts it in clear conflict to the sustainability of other sites such as Botchergate, the Citadel and the area around Carlisle Station.

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?

The Sustainability Appraisal report does not clearly show how the Sustainability Appraisal has informed the choice of the Rickergate area for large scale development.

Extract

Carlisle District Local Plan 2015-2030

Policy SP1 Sustainable Development

3.4 The Carlisle District Local Plan is the first reference point for those involved in determination of planning applications. The NPPF makes it clear that the local planning documents should reflect the presumption in favour of sustainable development and Policy SP 1 responds to this requirement.

3.5 It is important to note that in accordance with other policies in the NPPF that the presumption does not apply to development affecting sites protected under the Birds and Habitats Directives and/or land designated, amongst others, as a Site of Special Scientific Interest (SSSI), an Area of Outstanding Natural Beauty (AONB), Local Green Space, designated heritage assets or locations at risk of flooding or coastal erosion.

I do not believe that the statement above (3.5) that the presumption of sustainable development does not apply to locations at risk of flooding is reflected in the plans for Rickergate in the Carlisle District Local Plan.

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.

The residents and business owners of Rickergate have been through this once before. Following the floods of 2005 most of us did not return to our homes until almost a year later, after having our homes and businesses refurbished we then faced the threat of having our homes compulsory purchased with a view to demolition. I am just an ordinary member of the public with no real knowledge of the planning system, but I would like the opportunity to put my concerns forward.

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