



The Carlisle District Local Plan  
2015-2030

**Proposed Submission  
Draft Consultation  
Representation Form**



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 **20<sup>th</sup> 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](http://www.carlisle.gov.uk/localplan)

### How to respond –

**Via email:** [lpc@carlisle.gov.uk](mailto: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.

<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title: Mr	Title:
Surname: Preston	Surname:
Forename: Stephen Malcolm	Forename:
Organisation/Company:	Organisation/Company:
Address: Scotby Carlisle Postcode: CA4 8BH	Address:   Postcode:
Contact No:	Contact No:
Email:	Email:
Signature: S M PRESTON	
Date: 18/04/2015	
Please indicate if you wish to be updated on the progress of the Local Plan - YES	

## **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.

<b>Q1. To which part of the document does this representation relate?</b>			
Policy	Paragraph	Chapter	Figure
<b>Please specify which Policy, Paragraph, Chapter or Figure you are referring to:</b>			
Policy HO1 and R15			

<b>Q2. Do you consider that the Local Plan is:</b>		
<b>Legally Compliant?</b>	Yes	
<b>Sound?</b>	No	

<b>Q3. If you consider the Local Plan is <u>unsound</u>, is it because it is <u>not</u>:</b>
Justified

<b>Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.</b>
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.</b>
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 believe the Housing Policy HO1 and the inclusion of site R15 (Hill Head, Scotby) is unjustified, resulting in the draft Local Plan being considered unsound. My reasons are as follows.  The Carlisle District forecast of 565 houses being built per year is unrealistically high and exceeds by 54% the average of 367 houses per year built over the last twenty years. The inclusion of this site is not required to meet the housing needs of Carlisle.  The site abuts the northern edge of Scotby village and as such its development

would adversely affect the attractive landscape and setting of the village from the A69. The site extends into open countryside, resulting in any development being seen as an unwarranted and unnecessary intrusion into the landscape.

The greenfield site is high quality Grade 2 agricultural land which is actively farmed making a useful contribution to food security and the rural economy.

The site was rejected in the Local Plan consultation last Spring, resulting in most residents being currently unaware of this latest proposal.

The Carlisle Strategic Housing Local Assessment acknowledged that there would be “backlands” issues with this site and any mitigation would still leave this development having an adverse impact on the amenities of the properties along Hill Head and Scotby Road and on the residents' enjoyment of their homes and quality of life. The inclusion of land behind Holme Close was rejected on amenity grounds and for consistency, so should the Hill Head site.

In the SLHAA land to the North of this site bordering the A69 was rejected on access issues due to proximity of the dual carriageway. This site has only one point of access, at a 90° angle from Hill Head, which would be unsuitable for the safe use of delivery, utilities and emergency vehicles and should also be rejected on access grounds.

United Utilities and the Environment Agency acknowledge there is a potential drainage problem on this site, visible to all during periods of wet weather. There are also known flooding problems along Scotby Road due to the lack of capacity in the foul/surface water sewers.

Scotby has already accommodated around 40 new homes on one site alone in the last year. Even more would put a strain on services and infrastructure already at capacity.

Development of this site would undermine the Council's policy of trying to encourage urban regeneration in Carlisle, in particular in bringing forward underused and derelict sites and in encouraging re-investment in the older housing neighbourhoods.

**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:**

Reduce the upper housing target in line with past trends and delete R15 site allocation from the plan.

**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 did not fully take into account the likely impact of the proposed development of this site on the adjoining residents' amenities and on its landscape, its setting, and its agricultural value.

**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

**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.**