



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 **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:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: Adamski/Hutchinson	Organisation/Company: North Associates
Address: Postcode:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
☒ 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:

HO1 (Housing Strategy and Delivery) - allocation R17 (Warwick Bridge/Little Corby North)

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.

The inclusion of housing allocation R17 - Warwick Bridge/Little Corby North is supported. However, please be advised that the site is deliverable within 1-5 years as opposed to the 6-10 stated in the allocation.

--

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:

N/A

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.

To discuss our associated submission in respect of the proposed incorporation of land to the immediate east and also to our objection to housing allocation R18.

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



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 **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:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: Adamski/Hutchinson	Organisation/Company: North Associates
Address: Postcode:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
☒ 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:

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.

Object to the failure of the Council to allocate land to the east/south east of allocation R17 (Warwick Bridge/Little Corby North) to form an enlarged allocation.

The merits of enlarging allocation R17 are set out in the accompanying planning statement.

--

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:

Allocate land to the east/south east of allocation R17 to form an enlarged allocation.

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.

To be able to discuss the merits of allocating additional land to R17, allied to the deletion of allocation R18 (Corby Hill/Head Nook Road).

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



CARLISLE DISTRICT LOCAL PLAN 2015-2030 PROPOSED SUBMISSION DRAFT

LAND AT WARWICK BRIDGE, CARLISLE, CA4 8QS

**PLANNING STATEMENT IN SUPPORT OF A PROPOSED ALLOCATION FOR HOUSING
DEVELOPMENT**

April 2015

Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire, BB7 4DH

T 01200 449707 M 07971 330063 E davem@north-associates.com
www.north-associates.com

1. INTRODUCTION

- 1.1 The land the subject of this statement (the promotion land) is identified below as that parcel coloured in red (draft housing allocation R17 – Warwick Bridge/Little Corby North) together with the parcel marked in the hatched notation to its immediate east. We have made a separate representation against the council's failure to allocate the hatched area on the basis that we are acting for both land owners whom are working together to seek to develop the two sites as a joint venture.



- 1.2 The promotion land will provide additional housing choice in this substantial settlement such that the combined allocation will be able to: significantly enhance the vitality and vibrancy of the settlement by delivering additional homes in a highly sustainable location; be of a proportionate scale; forming a natural, linear continuation of the settlement pattern; enhance and soften the character of the existing urban/settlement edge; provision of POS to the north/west of the A69; sustain local services; and to contribute towards affordable housing.
- 1.3 The Inspector is requested to assess this submission in the context of our separate objection to housing allocation R18.

2. THE SITE AND SURROUNDINGS

- 2.1 The site comprises an irregular parcel of agricultural land of circa 4.5ha (11 acres), which is generally open in character albeit with elements of tree and hedgerow planting. It is bound to the north by agricultural land; to the north east by mature woodland (Clayhurley Bank Woods); to the east by agricultural land; to the south east by

the line of the A69; and to the west by draft housing allocation R17 and significant residential development (Hurley Road et al).

- 2.2 The site lies immediately north/north east of Warwick Bridge and indeed has a contiguous boundary with the settlement boundary at this point.
- 2.3 Vehicular access to the site can be achieved from both Little Corby Road and the A69.
- 2.4 In its Housing Site Selection Proposed Submission Draft in respect of draft housing allocation R17, the Council summarises Warwick Bridge as:

“Being a sustainable location for development as it has a good range of local services and facilities including a primary school, shop, Warwick Mill business village and a doctor’s surgery.”

“This site is well related to the built form of the village in this location, and its development will have minimal impact on the landscape. The field pattern is such that the development would be bordered by existing mature hedges, which could be reinforced with additional planting to maintain biodiversity opportunities and give a softer, more rural boundary to the development.”

“Whilst it is recognised that most of the services and facilities in Warwick Bridge lie on the south side of the A69, there is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. The village also has good public transport connections with Carlisle and Brompton, there being two buses an hour in the daytime.”

3. STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) CONSULTATION DRAFT DECEMBER 2014

- 3.1 The Council produced an updated SHLAA in the winter of 2014. The majority of the site is identified as site WB09 with the north western corner being the subject of site WB02 (please see plan overleaf).



SHLAA extract: December 2014 update

- 3.2 The Council only includes settlements containing deliverable or developable sites (as defined by the footnotes to paragraph 47 of the NPPF).
- 3.3 The Council colour codes the various sites to identify which were considered to be either deliverable or developable. Deliverable sites, which includes the current promotion site, are those that can deliver new housing within years 1-5 (2015-2019) of the emerging Carlisle District Local Plan being adopted. Developable sites are those sites that are likely to deliver new housing in years 6-15 (2020 and beyond).
- 3.4 For the avoidance of doubt, the site is deliverable within a five-year window.

4. PLANNING HISTORY

- 4.1 There is no recorded planning history that is considered to be relevant to the current proposal to develop the site for housing.

5. NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

Introduction

- 5.1 Planning policy guidance is provided at the national level by the National Planning Policy Framework (NPPF), which was published on the 27 March 2012. Updates and guidance is provided in the form of Planning Practice Guidance. The NPPF replaces the vast majority of the previous suite of planning policy statements and sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 5.2 The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. Planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements.
- The presumption in favour of sustainable development
- 5.3 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.4 The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.
- 5.5 The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 5.6 For decision-taking on planning applications, this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
 - Specific policies in the Framework indicate development should be restricted.
- 5.7 Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon, and reflect, the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.
- Housing
- 5.8 Paragraphs 47-55 of the Framework relate to housing delivery matters and the need to deliver a wide choice of high quality homes.
- 5.9 Paragraphs 47-48 address a requirement to significantly boost supply and that LPAs should objectively assess the need for market and affordable housing in their Local Plans. Deliverable sites should be identified on an annual basis sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Beyond this, a

supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15, should be identified.

- 5.10 The NPPF states that, for sites to be considered deliverable, they should be:
- Available now
 - Offer a suitable location for development now
 - Be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable
- 5.11 The site meets, without exception, all of the requisite tests and it should therefore be brought forward at the earliest opportunity.
- 5.12 Turning to developability, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Again, the site meets these requirements.
- 5.13 Paragraph 49 makes it clear that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 5.14 Paragraph 50 seeks to encourage the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should:
- Plan for a mix of housing based upon current and future demographic trends; market trends and the needs of different groups in the community.
 - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
 - Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating this need on site with mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- Housing summary
- 5.15 The proposed development of the subject site can deliver a range of new homes, both private and affordable, on a site that the central thrust of the NPPF supports as a means by which to contribute to the delivery of unit numbers and housing choice.
- 5.16 The site then meets the deliverable and developable criteria without exception.
- 5.17 The development of the site for new homes should therefore be considered in the context of the presumption in favour of sustainable development.

6. SUMMARY

- 6.1 Draft housing allocation R17 adjoins the promotion site to its western edge, therefore, as a matter of locational principle, the land undoubtedly displays the requisite physical and locational characteristics whereby the presumption in favour of sustainable development (the golden thread) advocated in the NPPF should be applied when considering the nature of the proposed development.
- 6.2 The site meets, without exception, all of the requisite NPPF tests and it is considered that it should therefore be brought forward at the earliest opportunity via a planning application on the basis that it is:
- Available now
 - Offers a suitable location for development now
 - Is achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.
- 6.3 The Council acknowledges that Warwick Bridge is a sustainable settlement. The land is available, relates well to existing urban form, and benefits from a range of local services and facilities, including: public transport, primary school, churches, open space, play areas and a good range of neighbourhood shops
- 6.4 The development of the site for housing would be consistent with, inter alia, saved policy DP1 to the 2008 Local Plan and then with allocation R17 to policy HO1 (western half of the site) and policy HO2 on windfall housing development (eastern half of the site) to the Proposed Submission Draft of the emerging Local Plan.
- 6.5 It is evident that, as a point of locational principle, the proposed housing site constitutes the linear rounding off of the settlement to its north eastern corner. The nature of the site's boundaries is also such that they are extremely well defined, robust and provide absolute containment with no prospects for sporadic and uncontrolled protrusion and sprawl into the countryside beyond.
- 6.6 This assimilation into the exiting urban form of the settlement is a stark contrast to the obvious and harmful impact of proposed allocation R18, which we have requested be deleted under a separate representation.
- 6.7 At the detailed development management level, it is recognised that the site needs to be approached having appropriate regard to, in particular, setting and landscape impact. On this basis, an indicative housing yield of circa 120no. units is proposed, made up of 45no. units on draft housing allocation R17 and the balance of 75no. units on the promotion land. This total number should be seen in the context of the deletion of allocation R18, which has an indicative yield of 30no. units. This approach would avoid the profligate use of the promotion land whilst striking an appropriate balance between delivering new homes and landscape integrity.

- 6.8 Turning to highway matters, detailed input has been provided by White Young Green Transport, which is one of the UK's leading traffic and transportation planning consultancies. They have looked at, in particular, the following issues:
- Visibility and location of site access/egress points
 - Capacity and impact upon the network
 - Physical characteristics of Little Corby Road and the A69
- 6.9 The site is situated in a sustainable location and hence it would be very accessible on foot, by cycle and public transport. Accordingly, the proposals comply with the NPPF and current local transport policy.
- 6.10 It is proposed that the site be serviced via two junctions, one onto Little Corby Road and the second onto the A69. Detailed discussions are ongoing with the Highways Agency in so far as the precise location of a connection to the A69 is concerned on the basis that this road is part of the strategic road network.
- 6.11 Whilst the A69 through Warwick Bridge is clearly not a motorway or near motorway standard road, *DfT Circular 02/2013 – The strategic road network and the delivery of sustainable development* nonetheless requires the Highways Agency (HA) to be engaged and satisfied that any new junction does not have an adverse impact upon the free-flow of traffic. The promoter of any new junction will be expected to secure all necessary consents, and to fund all related design and construction works.
- 6.12 Thus far, automatic traffic counts (ATCs) have been undertaken and these show that a new junction can, in principle, be accommodated. It now falls for a detailed position and location to be agreed with the HA, which is currently in hand.
- 6.13 Whilst further discussion is required with both the HA and with Cumbria County Council as local highway authority to inform both the detail of the junction design and the preparation of the wider matters to be addressed in the Transport Assessment (TA), suffice to say the impact of the development will be acceptable in highway terms and that the local highway network can accommodate the proposed development traffic.
- 6.14 In view of the above positive findings, development of the site is therefore consistent with section 4 of the NPPF and the residual impact of the development will certainly not be severe, which paragraph 32 seeks to avoid. As such, the development proposals are reasonable and appropriate for the location and the development complies with policy objectives such that there are no highways related issues that would prevent the proposals being approved.

- 6.15 The Inspector is respectfully requested to consider favourably the allocation of this site as a means by which to deliver new market and affordable homes in Warwick Bridge.

David Miller BA (Hons) BPL MRTPI
Planning Director



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 **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:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: Adamski/Hutchinson	Organisation/Company: North Associates
Address: Postcode:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
☒ 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:

HO1 (Housing Strategy and Delivery) - allocation R18 (South of Corby Hill/Head Nook Road)

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.

Object to the inclusion of housing allocation R18 (South of Corby Hill/Head Nook Road).

The Council's own assessment of this draft allocation in its Local Plan Preferred Options Stage Two Consultation (spring 2014) is such that:

"This is a long narrow site which protrudes eastwards out of the village, and has open countryside on two sides. The site is not particularly well related to the rest of the village in this location. The site extends out into the open countryside, where

both the physical and visible perception is that of being outside the village. The frontage of the site extends over 300m out of the village. The rest of the village (Warwick Bridge, Corby Hill and Little Corby) has developed in a nucleated pattern. This site would be out of scale and form with the rest of the village."

We would concur fully with the Council's own assessment albeit the settlement is perhaps more akin to being linear, formed between Little Corby Road and the A69, as opposed to nuclear.

Given the above physical considerations, there is simply very little merit in seeking to allocate a site that will give rise to demonstrable harm to open countryside that lies beyond the linear form of the settlement. The fact that the site has been reduced in area so as to lessen the harm caused to its protrusion eastwards is no form of justification whatsoever to retaining it as housing allocation R18.

The Council's justification for R18 in its Housing Site Selection Proposed Submission Draft is premised as follows:

"The north western part of the site is better related to the built form of the village in this location. Feedback from public consultation indicated some support for a site on this side of the A69, which was seen as more accessible to the majority of the local services within the village, including the surgery, shop and primary school and business park."

There remains admission in the opening sentence that "the site is (only) better related to the built form of the village in this location" as opposed to the Council going so far as to state that the allocation is positive and to therefore endorse it. Rather, the Council fails to endorse the allocation but rather state that it is less intrusive than it was previously. This cannot be a sound basis upon which to allocate land for development.

Referring again to the Council's Housing Site Selection Proposed Submission Draft in respect of draft housing allocation R17 for Warwick Bridge, it states as follows:

"Whilst it is recognised that most of the services and facilities in Warwick Bridge lie on the south side of the A69, there is a signalled crossing at the light controlled junction at the northern end of the village, and three further pedestrian crossings with refuges in the middle of the A69. The village also has good public transport connections with Carlisle and Brampton, there being two buses an hour in the daytime."

The Council's justification for supporting draft allocation R18, then, (proximity to services on the south side of the A69), is totally compromised in that this is not seen as a prerequisite given its views on draft allocation R17.

What we therefore have is the situation of draft housing allocation R18 being supported on the basis that it has an undesirable impact upon the linear pattern of Warwick Bridge and the open countryside to the south east.

The common sense approach is to therefore delete draft housing allocation R18 and incorporate additional housing growth in the form of an extension to draft housing allocation R17 in accordance with the separate representations we have made on this matter.

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:

Delete draft housing allocation R18 and instead extend draft housing allocation R17 in accordance with our separate representations.

--

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.

To be able to discuss the merits of deleting allocation R18 allied to the extension of allocation R17.

--

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