



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:	Title: Mr
Surname:	Surname:Taylor
Forename:	Forename:Robert
Organisation/Company:Alexandra Sawmills Ltd	Organisation/Company:Taylor & Hardy Ltd
Address:	Address:North House Kingstown, CARLISLE
Postcode:	Postcode:CA6 4BY
Contact No:	Contact No:01228 538886
Email:	Email:bob.planners@taylorandhardy.co.uk
Signature: Bob Taylor	
Date:20 April 2015	
<input checked="" type="checkbox"/> 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?

<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input checked="" type="checkbox"/> Chapter	<input type="checkbox"/> Figure
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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Policy EC2, Chapter 4

Q2. Do you consider that the Local Plan is:

Legally Compliant?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Sound?

<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No
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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 Council's evidence base identifies a considerable amount of employment land representing some 35 to 80 years supply far in excess of the Local Plan period. The Local Plan adds to this: 45 Ha under policy EC1; further land release unquantified at Carlisle South; and a recognition of surplus employment land potential at the former MoD site at Longtown 243 Ha (para 3.19). The Local Plan fails to reflect National Policy advice aimed at encouraging economic activity. Previous versions of the Local Plan adopted a more pro-active approach with the identification of Mixed Use Areas. That approach with a more balanced rationale regarding the qualities of employment land ie that which should be retained in such use would provide certainty and clarity.

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 owns the land at Willowholme the boundaries of which are identified, in red, the plan provided at the preferred consultations stage (Ref 109).

My Client objects to the identification of their land as a Primary Employment Area on the Local Plan Preferred Options Policy Map. The Local Plan should revert to the approach set out in the Preferred Options Stage 2 of Spring 2014 in identifying Mixed Use Areas.

It is considered that such an approach and the designation of the land as a Mixed Area is appropriate for the following reasons:

- the National Planning Policy Framework (NPPF) places significant weight on the “need to support economic growth through the planning system” and to “encourage and not act as an impediment to sustainable growth” (Paragraph 19).
- The designation of the land as a Mixed Area could help promote opportunities to redevelop the site which may be a realistic issue within the Local Plan’s lifetime;
- a core principle of the NPPF is to “promote mixed use developments, and encourage multiple benefits from the use of land”, recognising that mixed use developments can “bring together those who live, work and play in the vicinity” (Paragraphs 17 and 69 respectively);
- the NPPF advises that Planning Authorities should “manage patterns of growth to make the fullest possible use of public transport, walking and cycling” (Paragraph 17). The site is sustainably located in close proximity to the City Centre with good transport links, including access to Carlisle Railway Station; and
- paragraph 70 of the NPPF emphasises that planning policies should “ensure

an integrated approach to considering the location of housing, economic uses and community facilities". The promotion of the site as a Mixed Area, would be compliant with this objective.

Nearby sites were covered by this designation in the preferred options consultation. Further mixed areas were identified which were covered by the previous employment land designation. Changing the designation of this site will assist in bringing forward an appropriate scale and type of development in the road corridor at this important entrance gateway to the City Centre.

In the event that the Inspector believes that a Mixed Use policy is not justified the land should become "White Land"

The need to retain sites in employment land designation is over stated and conflicts with advice in the NPPF (para 22) to avoid long term protection of sites where there is no reasonable prospect of the site being used for that purpose. The site ceased operations in December 2012. It has been marketed since then. No proposals have come forward. Bearing in mind the cornucopia of good quality sites close to the M6 that is hardly surprising.

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.

The Council's approach is unsound. A much more pro-active approach is required. I have an extensive knowledge of the planning policy approach locally, having worked in the area since 1972.

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