

Fiona Kenmare

From: Sam Greig <sam.planners@taylorandhardy.co.uk>
Sent: 20 April 2015 13:05
To: LPC
Subject: Rep No 0231 0232 Osgood Land at Junction 42 and assoc docs Agent T and H 20 Apr 15
Attachments: Location Plan Illustrating Land Within Clients Ownership.pdf; Proposed allocation.pdf; Investment and Policy1.docx; Investment and Policy Stage 2 Consultation Form.docx; 2015 Representation Form.pdf

Good morning

Please find attached a copy of the "Submission Draft Consultation Representation Form" that I have completed on behalf of my client, Messrs Osgood of Johnson Farms, in respect of land located to the east of Junction 42, Carlisle.

For ease of reference I have also attached the previous representations that were submitted, which have been referred to in respect of our response to the Proposed Submission Draft.

If you have any queries regarding the content of the response please do not hesitate to contact me. I would be grateful if you could acknowledge receipt of this e-mail.

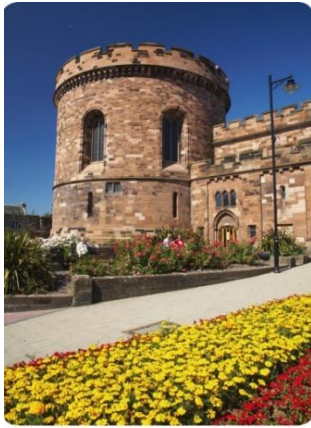
Many thanks,

Sam

Sam Greig, Dip.T.P., M.R.T.P.I
Principal Planner

Taylor and Hardy
North House
Kingstown
Carlisle
Cumbria
CA6 4BY

Tel: 01228 538886
Mob: 07533400061
Email: sam.planners@taylorandhardy.co.uk
Web: www.taylorandhardy.co.uk



The Carlisle District Local Plan 2015-2030

Proposed Submission Draft Consultation Representation Form



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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: Messrs	Title: Mr
Surname:Osgood	Surname:Greig
Forename:	Forename:Sam
Organisation/Company:Johnsons Farm	Organisation/Company:Taylor and Hardy Ltd
Address:c/o Taylor and Hardy Ltd Postcode:	Address:North House Kingstown Carlisle Postcode:CA6 4BY
Contact No:	Contact No:01228 538886
Email:	Email:sam.planners@taylorandhardy.co.uk
Signature: Sam Greig	
Date:20/04/15	
<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 type="checkbox"/> Chapter	<input type="checkbox"/> Figure
Please specify which Policy, Paragraph, Chapter or Figure you are referring to:			
Policy SP2 - Strategic Growth and Distribution Policy EC1 - Employment Land Allocations			

Q2. Do you consider that the Local Plan is:			
Legally Compliant?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
Sound?			
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No	

Q3. If you consider the Local Plan is <u>unsound</u>, is it because it is <u>not</u>:	
<input checked="" type="checkbox"/>	Positively Prepared?
<input checked="" type="checkbox"/>	Justified?
<input checked="" type="checkbox"/>	Effective?
<input checked="" type="checkbox"/>	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.
On behalf of my client, Johnson Farms, I object to the Proposed Submission Document, with particular reference to Policy SP2 (Strategic Growth and Distribution) and Policy EC1, (Employment Land Allocations). My client objects to the exclusion of their land as a proposed employment allocation. Their land is located to the east of Junction 42 and is identified on the attached plan, which illustrates the land that they own to the east of the A6.

My previous representation identified all of the land that my client owns in this area, which extends to 105 hectares. Whilst all of their land is available for development it is not suggested that all of their land is allocated for employment use.

It is proposed that a 15 hectare parcel of land to the east of the Junction 42 services and truck stop is allocated for employment use. The site is identified in red on the attached plan titled 'Proposed Allocation'. The proposed allocation could, however, be extended to accommodate a major inward investor.

I have attached copies of the previous representations that were lodged in respect of the Stage 1 and 2 versions of the emerging Carlisle District Local Plan (ECDLP). The comments made in these representations are still relevant.

For the following reasons, I consider that the Proposed Submission Draft (PSD) cannot be considered to be a 'sound' Local Plan for the purposes of interpreting Paragraph 182 of the NPPF:

1. Policy SP2 (Strategic Growth and Distribution) fails to identify land along the M6 corridor for employment purposes.

The Council's evidence base, in the form of the Carlisle Employment Sites Study (2010) and the Economic Review of Carlisle (2013), identifies that one of the key economic issues "has been the lack of quality and choice of employment locations for companies to invest" (Paragraph 3.17 of the explanatory text to Policy SP2).

Paragraph 3.17 states that the Local Plan "seeks to address these shortcomings through encouraging and facilitating investment in existing sites, and complementing this offer through the provision of new sites, particularly within the strategically important M6 Corridor which is a recognised Cumbria LEP priority".

Principle 2 of Policy SP2 states that "Sufficient land will be identified to create the right conditions for growth". Sub paragraph a) identifies that the focus for development will be the urban area and locations which can maximise the benefits of the M6 corridor.

Notwithstanding the Council's strategic policy objective to encourage growth, Policy SP2 fails to identify any new sites along the M6 corridor that would give a major inward investor of regional significance the confidence to invest in Carlisle.

The Council has allocated employment land at Brunthill, which already has had Outline planning consent since September 2010. The employment land at Brunthill and its contribution strategic vision is discussed in section 2 below.

2. Both Policy SP2 and Policy EC1 make reference to the provision of an additional 45 hectares of employment land. The sites in question comprise 37 ha of land at Brunthill, Kingmoor Park, and 8 ha of land to the south west of Morton. These parcels of land were granted Outline planning consent in September 2010 and November 2010 respectively (LPA References 09/0170 and 09/0413).

Of these two sites only the employment land at Brunthill can be said to be well related to the Motorway corridor. The allocation of this land is supported, however, the explanatory text to Policy EC2 states “the Carlisle Economic Partnership Economic Review of Carlisle (January 2013) identifies enhancing and developing key employment sites at Carlisle motorway junctions as a key action, which aligns with wider and well established aspirations to realise the economic potential of the M6 corridor.”

The Plan and its evidence base is clear that the promotion of the motorway corridor to maximise its economic potential is a key strategic objective. It is also clear that further employment development, in addition to the allocation at Brunthill, should be supported.

Policy EC1 identifies that the provision of additional employment land will be considered as part of ‘Carlisle South’, which identifies a broad location for a mixed use urban extension.

My client does not object to the principle of the Carlisle South Masterplan; however, emerging Policy SP3 (Broad Location for Growth: Carlisle South) is clear that “the urban extension is phased to be delivered from 2025 onwards”.

The reliance of Carlisle South to promote the use of the M6 corridor raises two key issues. These issues are:

- a) the timescale in which the employment land will be delivered; and
- b) the location of that employment land and whether it will genuinely promote the development of the M6 corridor.

In respect of the latter point, the diagram on page 30 of the Proposed Submission Draft identifies that the potential locations for Carlisle South spans from the eastern extent of the Carlisle Northern Relief Road to Junction 42. There is no certainty as to where the employment land proposed as part of the extension will be situated. Furthermore, the explanatory text to Policy SP3 states that “The delivery of Carlisle South as a strategic growth option may also help to deliver in the long term a southern link road from the A689 (western bypass) to Junction 42 of the M6” (Paragraph 3.33). The explanatory text is clear that the delivery of the southern relief road is not a certainty. Given the emphasis that the Plan places on maximising the use of the M6 corridor to rely on Carlisle South alone, the details of which are as yet unknown, would not accord with the NPPF’s ‘plan-led’ approach.

In the event that the location of the employment land associated with Carlisle South does encourage the use of the M6 corridor, the Council’s timescale to deliver the southern extension is such that the provision of any new employment land will not be achieved until the very end of the Plan period.

To delay the delivery of new employment land to the south of the City will prejudice the Local Plan’s objective to:

1. Redress the imbalance of employment land located to the north of the City;

2. Attract investment and encourage job creation in a location which utilises the M6; and
3. Provide choice of employment locations for companies to invest.

The allocation of land at the motorway junctions will give certainty for developers looking to utilise the M6 corridor. Without such certainty the Council risks losing potential significant inward investment to other locations along the M6 outside of the District. This potential risk is increased by the fact that any employment land planned as part of the southern extension will not occur until 2025 at the earliest.

To wait until the end of the Plan period to address this strategic objective is an opportunity lost and it will directly impact upon the ability of the Plan to deliver its objectives.

The allocation of some of my client's land for employment purposes will help achieve the objectives of the Local Plan. As a minimum the Council should update its Proposals Map should to provide a clear steer to investors that new employment development around the City's motorway junctions will be supported in principle, subject to compliance with the other relevant Local Plan policies.

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:

That my client's land is allocated for employment development.

--

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?

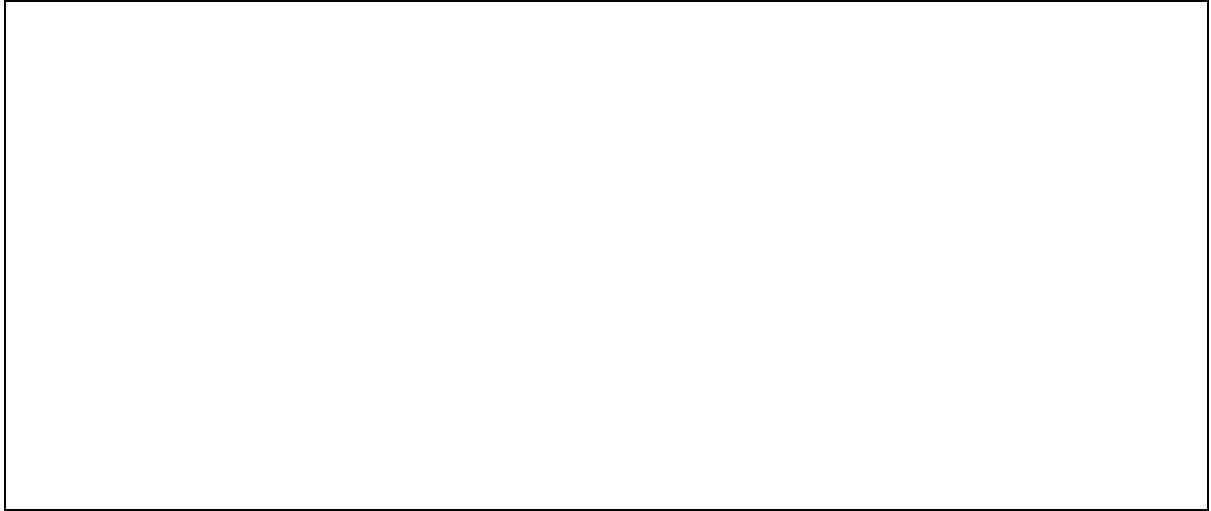
☐ No, I do not wish to participate at the hearing sessions of the examination

☒ 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:

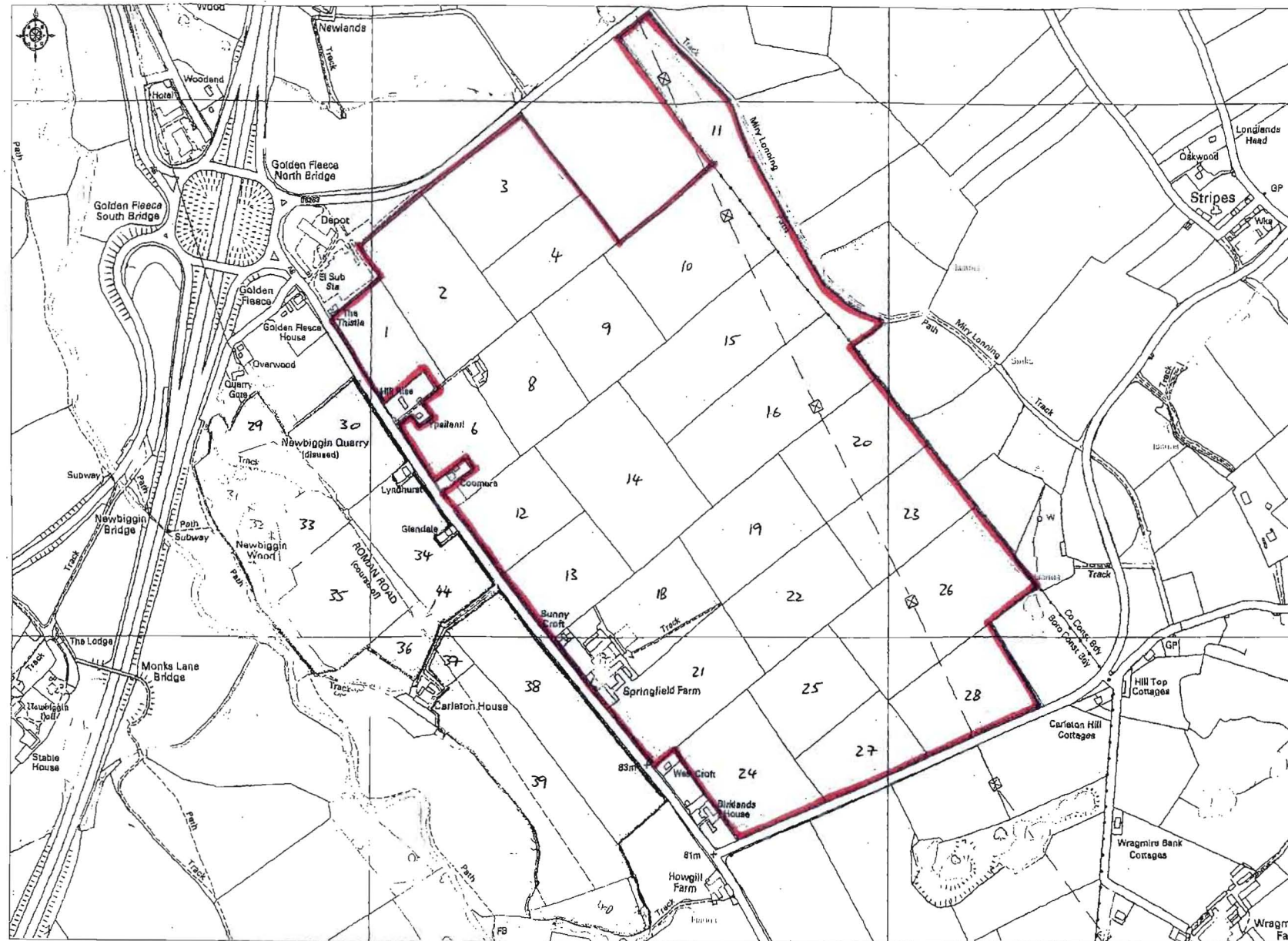
Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.

To explain why the allocation of my client's land would be appropriate.



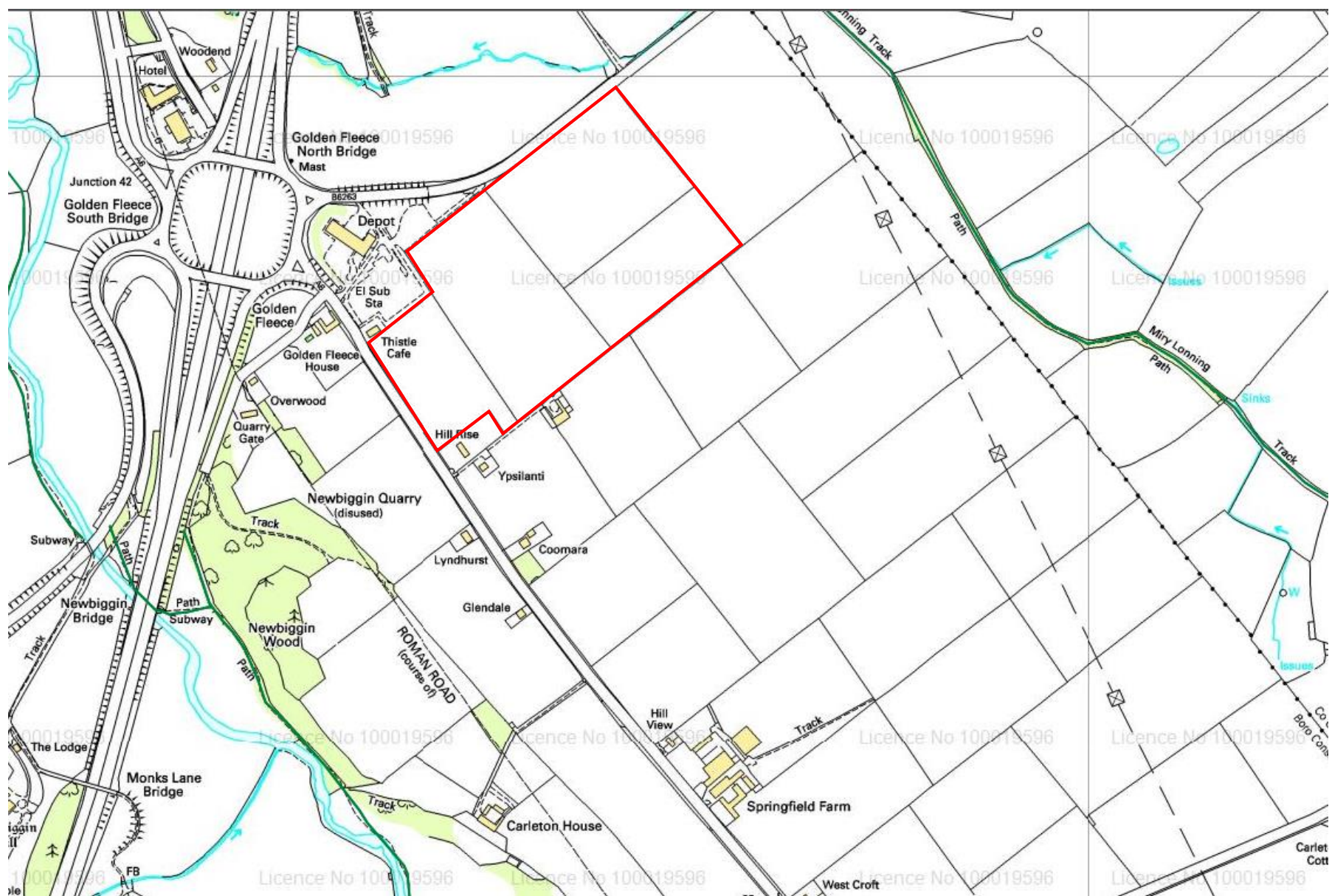
**Thank you for your time to complete and return this Representation form.
Please keep a copy for future reference.**

SPRINGFIELD FARM AND LAND SURROUNDING CARLETON HOUSE



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This map was created with ProniMap



Our Ref : SG/J/C13/110

5th September, 2013

Investment and Policy,
Carlisle City Council,
Civic Centre,
CARLISLE.
CA3 8QG

Dear Sir,

PLANNING CARLISLE'S FUTURE
DRAFT LOCAL PLAN 2015-2030
PREFERRED OPTIONS CONSULTATION

- **Policy 1 – Employment and Commercial Growth Land Allocations;**
 - **Land to the east of Junction 42, Carlisle**
-

I am writing on behalf of my Clients, Messrs Osgood, to object to the document referred to above, with particular reference to Policy 1, Employment and Commercial Growth Land Allocations.

My Clients own land to the east of Junction 42, Carlisle, which is identified on the enclosed plan (105 hectares). They object to the exclusion of their land from the list of sites allocated, under Policy 1, for employment development.

My Clients confirm that the land is available to be developed and would like to see this land brought forward for employment development. It is my Clients view that the development of the land for employment purposes:

- complies with the thrust of the policy objectives contained within the National Planning Policy Framework;
- could help redress the imbalance associated with the disproportionately high level of employment land located to the north of the City when compared with the significantly lower level of employment land located to the south. This issue was identified within the Carlisle Employment Sites Study, dated June 2010, undertaken by DTZ on behalf of Carlisle City Council;

- has a realistic prospect of being delivered and could satisfy Carlisle City Council's aspirations for a Science Park, an objective which was identified in the Director of Economic Development's report, dated 17th June 2013, to the Council's Executive titled "*Local Plan – Land Allocations*" (Report No. ED/14/13);
- provides an opportunity to maximise the economic potential of the M6 corridor;
- does not raise any significant highway related issues;
- is of sufficient size to enable the provision of a significant landscape buffer, including opportunities for wildlife habitat enhancement;
- could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties; and
- provides an opportunity to expand the site in the future as the land is owned by members of the same family.

Taking into account the above points the allocation of the land for employment development in the Local Plan 2015-2030 would be wholly appropriate.

I trust that the above will be given close consideration as matters progress. If you would like to discuss opportunities for developing the site please do not hesitate to contact me.

I would be grateful if you would acknowledge receipt of this objection.

Yours faithfully,

SAM GREIG

cc by email only to: Messrs Osgood
Mr. Mark Walker & Mr. Andy Ross

Planning Carlisle's Future

Carlisle District Local Plan 2015-2030 Preferred Options Consultation – Stage Two Questionnaire

Please Return your comments between
Monday 10 March and **Friday 4 April 2014**
to: lpc@carlisle.gov.uk or in writing to:

Investment and Policy, Carlisle City Council,
Civic Centre, Carlisle, CA3 8QG.



Carlisle District Local Plan Preferred Options Consultation – Stage Two Questionnaire: March – April 2014

The Carlisle District Local Plan 2015- 2030 will replace the Carlisle District Local Plan 2001-2016. We consulted on the Key Issues between January and March 2010 and on the Issues and Options from September-November 2010. We had a fantastic response to both of these consultations which, along with suggestions from our statutory consultees. These helped us to identify the issues that are important to you and are important to address for Carlisle's future and were used to create the Draft Carlisle District Local Plan 2015-2030 Preferred Options Stage One, which was consulted on from July – September 2013. We had over 1,100 comments which have helped us update that plan for this Stage Two consultation. Each of these comments along with an officer's response is available to be viewed on our web site. Your responses to this consultation will help us in the preparation of the next stage of the Local Plan, being 'Publication'.

Your views are important to us so please use this questionnaire to let us know your thoughts on the Draft Carlisle District Local Plan 2015-2030 Preferred Options Stage Two Consultation. We are interested in the views of all people who live in, work in, visit or travel through the District.

You will need to refer to the Carlisle District Local Plan 2015-2030 Preferred Options Consultation - Stage Two document whilst you are completing the questionnaire. This will show the range of policies and site allocations that are proposed to be taken forward. These are identifiable through differing key themes, for example employment and housing. It is optional as to how many Policies or Sites you comment on. The response form is available in an interactive format online at www.carlisle.gov.uk/localplan or can be downloaded as a PDF or Word document and emailed to the Investment and Planning Policy Team to lpc@carlisle.gov.uk. Hard copies are available at all local libraries, in the Customer Contact Centre within the Civic Centre, and by request to the Investment and Policy Team (please see contact details below).

The Council wishes to encourage as many people to respond as possible - please inform your neighbours, colleagues or other contacts about this consultation and get them to respond too.



Return completed questionnaires by Friday 4 April 2014



Investment and Policy, Economic Development, Carlisle City Council, Civic Centre, Carlisle, CA3 8QG



Complete online at www.carlisle.gov.uk/localplan or by email to LPC@carlisle.gov.uk

Part A: Your contact details

Data Protection

The information will be processed in accordance with the Data Protection Act 1998. Information from the forms will be stored on a computer database used solely in connection with the Local Plan consultation.

As all representations received must be made available for public inspection, they cannot be treated as confidential. They will be posted in full on the Council's website and will be available, on request, for public inspection: only signatures will be redacted.

Copies can be made of the response forms if you require more space, or you can simply continue on other sheets of paper, making clear which policy or site you are referring to.

	Personal Details	Agent's details (if applicable)
Title	Messrs	Mr.
First name		Sam
Last name	Osgood	Greig
Job title (if applicable)		Principal Planner
Organisation (if applicable)		Taylor and Hardy
Address	c/o Taylor and Hardy	9 Finkle Street, Carlisle
Postcode		CA3 8UU
Tel Number		01228 538886
Email address		sam.planners@taylorandhardy.co.uk

Part B: Your Comments

1) Local authorities have to update their Local Plan's to ensure that the communities aspirations for future development are achievable, based on up-to-date evidence about the economic, social and environmental prospects of the area. A large amount of evidence has been produced (available at www.carlisle.gov.uk/localplan) to help inform the plan, covering; Employment; Housing; Retail and Climate Change for example.

Based on the above, do you think the evidence that has been used for the Draft Local Plan is robust and credible? (Please tick)

Yes ☐ No ☐

Comment:

N/A

2) Local Plans are required to be in line with the National Planning Policy Framework (NPPF hyperlink). Do you think the Local Plan is consistent with National Planning Policy Framework? (Please tick)

Yes ☐ No ☐

Comment:

N/A

3) In order to prepare a Local Plan it is important that the Council carries out a Sustainability Appraisal and Habitats Regulations Appraisal in order to meet European Directive requirements by considering all of the likely significant effects that the plan may have on the environment, economic and social factors.

Having looked at the Sustainability Appraisal (SA) and Habitats Regulations Appraisal (available at www.carlisle.gov.uk/localplan) do you agree with:

the SA of the Local Plan so far?

Yes ☐ No ☐

Comment:

N/A

the Habitat Regulations Appraisal so far?

Yes ☐ No ☐

Comment:

N/A

Please complete Q4-Q6 for each policy or site you wish to make a representation/comment on. We have provided 10 additional comment sheets but please submit more information if you need to.

4) Which Policy/Site Allocation are you making representations/commenting on and do you wish to support/object/comment on the above? (please tick)

Policy Number/Site Allocation	Policy 16 (Housing Strategy and Delivery)	Support	
		Object	✓
		Comment	

5) Please state fully and clearly your comments and/or the reasons you are supporting/objecting to this part of the plan. Please complete a separate sheet for each policy/site allocation.

My client objects to the exclusion of their land, which is located to the east of Junction 42, as a proposed employment allocation (L.P.A. Reference No. 046).

My previous representation identified all of the land that my clients own, which covers 105 hectares. Whilst all of their land is available for development it is not suggested that all of their land is allocated for employment use.

I have attached a copy of the previous representation, which is still relevant.

My Client would also like to make the following comments in respect of the Stage 2 Preferred Options Consultation.

The Council's assessment of my Client's land concluded that:

"The Carlisle South Masterplan will identify employment land to the south of Carlisle which relates well to J42, the land in question will be given further consideration at that time. Policy 1 will be amended to recognise this fact."

Emerging Policy 2 (Spatial Strategy) identifies that it is the Local Plan's aspiration to ***"Develop a high value employment area to attract high value jobs in a location which utilises the M6 corridor including the area around J42..."***

The Council's response to our previous representation is clear that this issue will be considered as part of the Carlisle South Masterplan.

My Client does not object to the principle of the Carlisle South Masterplan; however, emerging Policy S3 (Broad Location for Growth: Carlisle South) is clear that ***"the urban extension is phased to be delivered from 2025 onwards"***.

The supporting text to emerging Policy S2 highlights that the "Carlisle Employments Sites Study" and

work on the “Local Economic Assessment and Economic Potential” identifies that ***“One of the key issues has been the quality and choice of employment locations for companies to invest.”*** (Paragraph 3.12).

Paragraph 4.5 of emerging Policy 1 (Employment Land Allocations) explains that the Carlisle Economic Partnership Economic Review of Carlisle (January 2013) ***“identifies infrastructure as one of its key priorities within which enhancing and developing key employment sites at Carlisle motorway junctions is highlighted as a key action*** (my emphasis).”

The Council’s timescale to deliver the southern extension is such the provision of any new employment land to the south of Carlisle will not be achieved until the very end of the Plan period.

To delay the delivery of new employment land to the south of the City will prejudice the Local Plan’s objective to:

1. Redress the imbalance of employment land located to the north of the City (Paragraph 4.5);
2. Attract high value jobs in a location which utilises the M6 corridor (Policies 1 and S2); and
3. Provide choice of employment locations for companies to invest (Paragraph 3.2).

The only other new employment allocations include land at Kingmoor Park and land to the south of Morton.

Whilst the allocation at Kingmoor Park already has Outline consent it will not address the issues identified in the emerging Local Plan (Points 1-3 above).

In respect of the land to the south of Morton, it has had Outline permission since 23rd November 2010. A Reserved Matters application that relates to the employment land has yet to be submitted and there is concern that land ownership issues will further delay the delivery of this site. The employment site at Morton occupies a prominent location at the western entrance to the City and is in close proximity to residential dwellings, both existing and proposed. These factors will limit the type of industrial activities that can take place.

The allocation of some of my Client’s land for employment purposes will give certainty for developers looking to utilise the M6 corridor. Without such certainty the Council risks losing investment to other locations, particularly as any employment land planned as part of the southern extension will not occur until 2025 at the earliest.

To wait until the end of the end of the Plan period to address the current issues identified by the Local Plan is an opportunity lost and raises questions regarding the ability of the Plan to deliver its objectives.

The allocation of some of my Client’s land for employment purposes may also help support the Council’s aspirations for an extension to the south of the City.

6) If objecting to a policy or site allocation, please indicate what change you are seeking to the plan which could resolve your objection.

The allocation of some of my Client's land adjacent to Junction 42 as an employment allocation. Until such time that the South Carlisle Masterplan is progressed it is suggested that land parcels 1-4, which are identified on the attached plan, could be allocated for employment use.

Fiona Kenmare

From: Sam Greig <sam.planners@taylorandhardy.co.uk>
Sent: 20 April 2015 13:53
To: LPC
Subject: Rep NO 0233 Osgood site R21 agent T and H 20 Apr 15
Attachments: 2015 Representation form - objection to allocation R21.pdf; Investment and Policy1.docx; Investment and Policy Stage 2 Consultation Form - objection to WREA1.docx

Good afternoon

Please find attached a copy of the "Submission Draft Consultation Representation Form" that I have completed on behalf of my clients, Messrs Osgood, in respect of proposed allocation R21 located within the village of Wreay.

For ease of reference I have also attached the previous representations that were submitted, which have been referred to in respect of our response to the Proposed Submission Draft.

If you have any queries regarding the content of the response please do not hesitate to contact me. I would be grateful if you could acknowledge receipt of this e-mail.

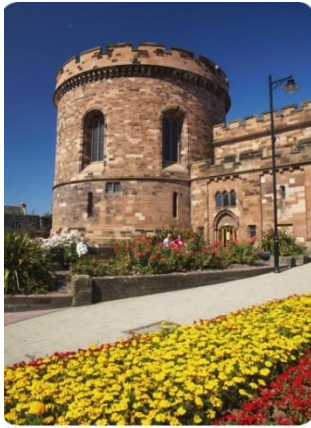
Many thanks,

Sam

Sam Greig, Dip.T.P., M.R.T.P.I
Principal Planner

Taylor and Hardy
North House
Kingstown
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CA6 4BY

Tel: 01228 538886
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The Carlisle District Local Plan 2015-2030

Proposed Submission Draft Consultation Representation Form



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CITY COUNCIL



www.carlisle.gov.uk



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

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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

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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: Messrs	Title: Mr
Surname:Osgood	Surname:Greig
Forename:	Forename:Sam
Organisation/Company:	Organisation/Company:Taylor and Hardy Ltd
Address:c/o Taylor and Hardy Ltd	Address:North House Kingstown Carlisle
Postcode:	Postcode:CA6 4BY
Contact No:	Contact No:01228 538886
Email:	Email:sam.planners@taylorandhardy.co.uk
Signature: Sam Greig	
Date:17/04/15	
<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 type="checkbox"/> Chapter	<input type="checkbox"/> 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?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Sound?		
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No

Q3. If you consider the Local Plan is <u>unsound</u>, is it because it is <u>not</u>:	
<input checked="" type="checkbox"/> Positively Prepared?	
<input checked="" type="checkbox"/> Justified?	
<input type="checkbox"/> Effective?	
<input checked="" type="checkbox"/> 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.
On behalf of my client I object to proposed allocation R21 - Land west of Wreay School. The previous representations that Taylor and Hardy has submitted in respect of this allocation identify our fundamental objections to the development of this site. These objections still stand. Since the Stage 2 consultation of the Preferred Options Document was published the application has considered application 14/0875, which is a Full application that

proposes the erection of 7 dwellings on the site of proposed allocation R21. The Council has advised that the application will be approved under the Council's delegated powers procedure once the applicant has completed a s106 agreement to secure the provision of an affordable housing contribution.

The submission of application 14/0875 provides a clear indication of the landowners intentions for that site.

It would be unsound of the Council to retain allocation R21 as it is clear that the prospect is securing 10 dwellings on the site are limited and, therefore, undermines the delivery of the housing figures identified within Policy HO1.

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 proposed housing allocation R21 and replace it with the designation of part of our client's land, which is centrally located within the village and offers significantly greater community benefits than the proposed allocation. Separate representations have been submitted to the Proposed Submission Draft which support the allocation of our client's land.

--

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 R21.

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

Planning Carlisle's Future

Carlisle District Local Plan 2015-2030 Preferred Options Consultation – Stage Two Questionnaire

Please Return your comments between
Monday 10 March and **Friday 4 April 2014**
to: lpc@carlisle.gov.uk or in writing to:

Investment and Policy, Carlisle City Council,
Civic Centre, Carlisle, CA3 8QG.



Carlisle District Local Plan Preferred Options Consultation – Stage Two Questionnaire: March – April 2014

The Carlisle District Local Plan 2015- 2030 will replace the Carlisle District Local Plan 2001-2016. We consulted on the Key Issues between January and March 2010 and on the Issues and Options from September-November 2010. We had a fantastic response to both of these consultations which, along with suggestions from our statutory consultees. These helped us to identify the issues that are important to you and are important to address for Carlisle's future and were used to create the Draft Carlisle District Local Plan 2015-2030 Preferred Options Stage One, which was consulted on from July – September 2013. We had over 1,100 comments which have helped us update that plan for this Stage Two consultation. Each of these comments along with an officer's response is available to be viewed on our web site. Your responses to this consultation will help us in the preparation of the next stage of the Local Plan, being 'Publication'.

Your views are important to us so please use this questionnaire to let us know your thoughts on the Draft Carlisle District Local Plan 2015-2030 Preferred Options Stage Two Consultation. We are interested in the views of all people who live in, work in, visit or travel through the District.

You will need to refer to the Carlisle District Local Plan 2015-2030 Preferred Options Consultation - Stage Two document whilst you are completing the questionnaire. This will show the range of policies and site allocations that are proposed to be taken forward. These are identifiable through differing key themes, for example employment and housing. It is optional as to how many Policies or Sites you comment on. The response form is available in an interactive format online at www.carlisle.gov.uk/localplan or can be downloaded as a PDF or Word document and emailed to the Investment and Planning Policy Team to lpc@carlisle.gov.uk. Hard copies are available at all local libraries, in the Customer Contact Centre within the Civic Centre, and by request to the Investment and Policy Team (please see contact details below).

The Council wishes to encourage as many people to respond as possible - please inform your neighbours, colleagues or other contacts about this consultation and get them to respond too.



Return completed questionnaires by Friday 4 April 2014



Investment and Policy, Economic Development, Carlisle City Council, Civic Centre, Carlisle, CA3 8QG



Complete online at www.carlisle.gov.uk/localplan or by email to LPC@carlisle.gov.uk

Part A: Your contact details

Data Protection

The information will be processed in accordance with the Data Protection Act 1998. Information from the forms will be stored on a computer database used solely in connection with the Local Plan consultation.

As all representations received must be made available for public inspection, they cannot be treated as confidential. They will be posted in full on the Council's website and will be available, on request, for public inspection: only signatures will be redacted.

Copies can be made of the response forms if you require more space, or you can simply continue on other sheets of paper, making clear which policy or site you are referring to.

	Personal Details	Agent's details (if applicable)
Title	Messrs	Mr.
First name		Sam
Last name	Osgood	Greig
Job title (if applicable)		Principal Planner
Organisation (if applicable)		Taylor and Hardy
Address	c/o Taylor and Hardy	9 Finkle Street, Carlisle
Postcode		CA3 8UU
Tel Number		01228 538886
Email address		sam.planners@taylorandhardy.co.uk

Part B: Your Comments

1) Local authorities have to update their Local Plan's to ensure that the communities aspirations for future development are achievable, based on up-to-date evidence about the economic, social and environmental prospects of the area. A large amount of evidence has been produced (available at www.carlisle.gov.uk/localplan) to help inform the plan, covering; Employment; Housing; Retail and Climate Change for example.

Based on the above, do you think the evidence that has been used for the Draft Local Plan is robust and credible? (Please tick)

Yes ☐ No ☐

Comment:

N/A

2) Local Plans are required to be in line with the National Planning Policy Framework (NPPF hyperlink). Do you think the Local Plan is consistent with National Planning Policy Framework? (Please tick)

Yes ☐ No ☐

Comment:

N/A

3) In order to prepare a Local Plan it is important that the Council carries out a Sustainability Appraisal and Habitats Regulations Appraisal in order to meet European Directive requirements by considering all of the likely significant effects that the plan may have on the environment, economic and social factors.

Having looked at the Sustainability Appraisal (SA) and Habitats Regulations Appraisal (available at www.carlisle.gov.uk/localplan) do you agree with:

the SA of the Local Plan so far?

Yes ☐ No ☐

Comment:

N/A

the Habitat Regulations Appraisal so far?

Yes ☐ No ☐

Comment:

N/A

Please complete Q4-Q6 for each policy or site you wish to make a representation/comment on. We have provided 10 additional comment sheets but please submit more information if you need to.

4) Which Policy/Site Allocation are you making representations/commenting on and do you wish to support/object/comment on the above? (please tick)

Policy Number/Site Allocation	Policy 16 (Housing Strategy and Delivery)	Support	
		Object	✓
		Comment	

5) Please state fully and clearly your comments and/or the reasons you are supporting/objecting to this part of the plan. Please complete a separate sheet for each policy/site allocation.

I am objecting on behalf of my Clients, Messrs Osgood, to the allocation of the land to the west of Wreay Primary School for residential development in the emerging Local Plan (L.P.A. Reference WREA1).

I wish to reiterate that it is my view that the allocation of the proposed site in Wreay is contrary to the policies identified in the emerging Local Plan for the reasons identified in our previous correspondence dated 11th September 2013 (Our Ref : SG/J/C13/111a). I have attached a copy of our previous objection.

In addition to the previous concerns raised, the allocation of this site for residential development will constrain future opportunities to extend the primary school, which may be necessary at a future date.

There are other primary schools in Carlisle District that are landlocked. This has created problems where those schools are oversubscribed and need to expand; Cumwhinton Primary School is one such example. To actively create a problem for the future, particularly where an alternative housing site exists, is nonsensical.

Whilst not necessarily a planning matter, there is also concern that the proposed dwellings may overlook the school which could raise perceived safety issues from parents of children attending the school.

6) If objecting to a policy or site allocation, please indicate what change you are seeking to the plan which could resolve your objection.

The exclusion of this site as a housing allocation.

Our Ref : SG/J/C13/111a

11th September, 2013

Investment and Policy,
Carlisle City Council,
Civic Centre,
CARLISLE.
CA3 8QG

Dear Sir,

PLANNING CARLISLE'S FUTURE
DRAFT LOCAL PLAN 2015-2030
PREFERRED OPTIONS CONSULTATION

- **Policy 19 – Housing Strategy and Delivery;**
- **Land to the west of Wreay School, Wreay, Carlisle (L.P.A. Reference WREA1);**

I am writing on behalf of my Clients, Messrs Osgood, to object to the document referred to above, with particular reference to Policy 19, Housing Strategy and Delivery.

My Clients object to the allocation of the land to the west of Wreay Primary School for residential development in the emerging Local Plan (L.P.A. Reference WREA1).

Wreay is a traditional village that contains several significant Listed Buildings, including St. Mary's Church, which is a Grade II* Listed Building. There has been limited new development in Wreay and the majority of the buildings are traditional in appearance.

The buildings are loosely arranged and many of the dwellings have large gardens, thereby creating a sense of space in the village. The sense of openness is enhanced by open areas of grazing land and grassed public spaces. There are a number of significant, mature trees, which add to the village's rural character.

Wreay is a sensitive location and any new development, if not carefully considered, would be harmful to the character of the village.

Within the emerging Local Plan it is stated that the number of dwellings on the site ***“would need to be restricted to 10 units to ensure that development does not have an adverse impact upon the amenity of the village”*** (Page 273).

I have assessed the Council’s decision to promote the site for residential development against the policies contained in the Council’s adopted Local Plan, its emerging Local Plan and the policy objectives of the National Planning Policy Framework (NPPF). On balance, it is considered that:

1. The number of dwellings proposed will result in a group of modern properties that are unrelated to the density, form and character of the settlement.

Emerging Policy 21 (Residential Development) states that:

“The density of new development should also aim to respond to local character...” and that,

“The density of new housing development should also contribute to the design objectives set out in Policy S3 Design.”

It is my view that the development of the site to provide 10 dwellings would be contrary to criterion 1 of Policy CP5 of the Carlisle District Local Plan 2001-2016; criterion 1 of emerging Policy 20 (Housing Development) and criterion 3 of emerging Policy S3 (Design).

2. The development would be clearly visible from the western entrance to St. Mary’s Church, a Grade II* Listed Building. The scale and density of the development, given its close proximity to St. Mary’s Church, would be harmful to the setting of this significant Listed Building.

The explanatory text to Policy LE12 states that:

“The setting of a Listed Building will vary greatly and often extends beyond the building’s own curtilage to encompass a number of other properties and public space” (Paragraph 6.56); and

“The character of historic buildings may therefore suffer, together with the contribution they make to the townscape or countryside if their setting is damaged by insensitive development...” (Paragraph 6.57)

It is submitted that the allocation of the land for housing would, by virtue of its impact upon the setting of the Listed Building, be contrary to Policy LE12 of the Carlisle District Local Plan 2001-2016.

3. The removal of a significant section of the mature roadside hedgerow, in order to achieve a vehicular access, would be contrary to criterion 6 of Policy CP5 of the Carlisle District Local Plan 2001-2016, criterion 6 of emerging Policy S3 (Design) and the objectives of emerging Policy 67 (Trees and Hedgerows). Emerging Policy 67 states:

“Proposals which would result in the unacceptable or unjustified loss of existing trees or hedges or which do not allow for the successful integration of existing trees or hedges identified within the survey will be resisted”.

4. The NPPF is underpinned by a presumption in favour of sustainable development. The NPPF states ***“sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment...”*** (Paragraph 9).

The Framework also states that ***“inclusive design goes beyond aesthetic considerations”***; that it is ***“proper to seek to promote or reinforce local distinctiveness”*** and that ***“planning policies ... should address the connections between people and places and the integration of new development into the natural, built and historic environment”***. (Paragraphs 60 and 61)

For the reasons highlighted in Points 1-3 above, the proposed allocation is contrary to the aforementioned policy objectives contained in the NPPF.

Taking into account the above points, it is submitted that the allocation of the land to the west of Wreay School would be wholly inappropriate.

I trust that the above will be given close consideration as matters progress. If you would like to discuss our concerns in greater detail please do not hesitate to contact me.

I would be grateful if you would acknowledge receipt of this objection.

Yours faithfully,

SAM GREIG
Associate Planner

cc by email only to: Messrs Osgood.

Fiona Kenmare

From: Sam Greig <sam.planners@taylorandhardy.co.uk>
Sent: 20 April 2015 14:48
To: LPC
Subject: Rep Ref 0238 Osgood- Proposed housing alloc, Wreay with maps agent T and H 20 Apr 15
Attachments: 2015 Representation form - proposed allocation in Wreay.pdf; Plan 13-111b.pdf; Wreay Indicative Layout Plan.pdf; Investment and Policy Stage 2 Consultation Form - Promotion of land at Wreay.docx; Investment and Policy2.docx

Good afternoon

Please find attached a copy of the "Submission Draft Consultation Representation Form" that I have completed on behalf of my clients, Messrs Osgood, in respect of the land that they own in Wreay. Also attached is a plan that illustrates the extent of the land that they own, together with an Indicative Layout Plan that shows how the site could be developed sensitively.

For ease of reference I have also attached the previous representations that were submitted, which have been referred to in respect of our response to the Proposed Submission Draft.

If you have any queries regarding the content of the response please do not hesitate to contact me. I would be grateful if you could acknowledge receipt of this e-mail.

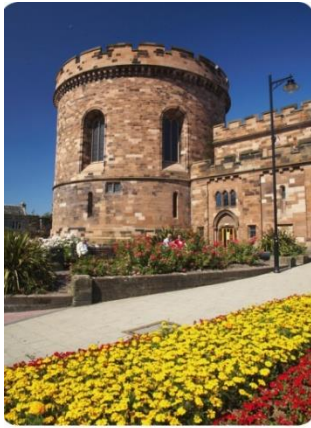
Many thanks,

Sam

Sam Greig, Dip.T.P., M.R.T.P.I
Principal Planner

Taylor and Hardy
North House
Kingstown
Carlisle
Cumbria
CA6 4BY

Tel: 01228 538886
Mob: 07533400061
Email: sam.planners@taylorandhardy.co.uk
Web: www.taylorandhardy.co.uk



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: Messrs	Title: Mr
Surname:Osgood	Surname:Greig
Forename:	Forename:Sam
Organisation/Company:Johnsons Farm	Organisation/Company:Taylor and Hardy Ltd
Address:c/o Taylor and Hardy Ltd Postcode:	Address:North House Kingstown Carlisle Postcode:CA6 4BY
Contact No:	Contact No:01228 538886
Email:	Email:sam.planners@taylorandhardy.co.uk
Signature: Sam Greig	
Date:17/04/15	
<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 type="checkbox"/> Chapter	<input type="checkbox"/> Figure
Please specify which Policy, Paragraph, Chapter or Figure you are referring to:			
HO1 - Housing Startegy and Delivery			

Q2. Do you consider that the Local Plan is:			
Legally Compliant?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
Sound?			
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No	

Q3. If you consider the Local Plan is <u>unsound</u>, is it because it is <u>not</u>:	
<input checked="" type="checkbox"/>	Positively Prepared?
<input checked="" type="checkbox"/>	Justified?
<input checked="" type="checkbox"/>	Effective?
<input checked="" type="checkbox"/>	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.
My clients own land in the centre of Wreay, which is identified, in red, on the enclosed plan. They object to the exclusion of their land from the list of sites allocated, under Policy HO1, for residential development.
The Council has identified Wreay as a sustainable location that could accommodate additional residential development to help support the existing services in the village, which include a primary school, a public house and a village hall.
Wreay is a traditional village that contains several significant Listed Buildings, including St. Mary's Church, which is a Grade II* Listed Building. There has been

limited new development in Wreay and the majority of the buildings are traditional in appearance.

The buildings are loosely arranged and many of the dwellings have large gardens, thereby creating a sense of space in the village. The sense of openness is enhanced by grassed public spaces and there are a number of significant, mature trees, which add to the village's rural character.

Wreay is a sensitive location and any new development, if not carefully considered, would be harmful to the character of the village.

On behalf of my clients I have objected to the site in Wreay which is allocated for residential development in the Proposed Submission Draft (L.P.A. Reference R21). It is considered that the development of the allocated site to provide 10 dwellings would be harmful to the form and character of the settlement and would adversely affect the setting of St. Mary's Church, a Grade II* Listed Building.

Notwithstanding these concerns, the Council has advised that the Council's preferred allocation is scheduled to be granted permission for the erection of 7 dwellings (L.P.A. Reference 14/0875). It could not, therefore, provide the ten units proposed by the allocation. A separate representation has been submitted objecting to the proposed allocation. In light of this fact, the Council should consider an alternative housing site if it is to deliver the objectives of Policy HO1. It is considered that the land that is within my clients' ownership, which is available to be developed, offers a suitable, alternative, location for the provision of approximately 10 houses within Wreay.

An indicative layout plan has been prepared to illustrate how the site could be developed sensitively. The location and position of the dwellings shown has been chosen following consultation with English Heritage.

It is considered that the allocation of some of my clients' land for residential purposes:

- allows an opportunity for land to be brought forward in a sensitive manner that fully respects, and does not compromise, the setting and historic character of Wreay;
- is well related to the village;
- does not raise any significant highway related issues;
- could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties; and
- complies with the thrust of the policy objectives contained within the National Planning Policy Framework.

The allocation of my clients land for housing in the Local Plan 2015-2030 would be wholly appropriate.

Following the Stage 1 Consultation on the Preferred Options document, the Council's assessment of my client's land concluded that the land was unsuitable for housing development on the basis that:

“The proposed site extends to some 3 hectares and is attractive, open parkland type landscape fringed by mature trees. There are open views to the Grade II * listed St Mary's Church to the south, and the Grade II * listed Sexton's Cottage to the north. The landscape impact of the development of this site, together with the impact on the listed buildings, is considered unacceptable. In addition, the site is wholly out of scale with the rest of the village.”

Whilst the Council's assessment of the site refers describes the site as an “attractive, open parkland type landscape” it is working agricultural land, which has the potential to be used for a variety of agricultural purposes. The site's perceived attractiveness at the time of the Council's assessment should not influence whether or not the site should be developed.

Our previous submission, on behalf of our client, was clear that whilst the full extent of our client's ownership was identified, it was not proposed that all of the site should be developed. The Council's justification for discounting our client's land makes it clear that it has not properly considered our client's land as an alternative housing site to that which is proposed.

It was also suggested that the extent of land available would enable the site to be developed in a way that was sensitive to the setting of the listed buildings, but also the loosely arranged character of the village. The provision of 10 houses on the proposed allocation could not achieve this and the resulting harm to the setting of the Grade II* church would be contrary to the objectives of the NPPF, which seek to safeguard the setting of historic assets.

The availability of land, which can be served by alternative points of access, will enable this site to be developed in sensitive way that avoids the need for an “estate style” housing scheme. It is considered that this is one of the fundamental benefits that my client's site offers over the proposed allocation in Wreay, which could appear as a small estate tagged onto the side of the village, wholly unrelated to the adjacent properties. Such a proposal would clearly be harmful to the setting of this historic village.

If the Council were minded to support the principle of allocating some of my client's land for residential development my client has indicated a willingness to provide:

1. additional parking provision for community use, including the village hall, church and primary school;
2. a large area of open space for community use; and
3. an extension to Wreay's cemetery.

The provision of the above facilities, which might not otherwise be delivered, will benefit the community significantly and provide a genuine opportunity to properly plan for the future development of this community.

The ability to provide an allocation that will sensitively allow for the development of Wreay, together with the substantial public benefits that could also arise, weigh heavily in favour of allocating our clients' land over proposed allocation R21.

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 allocated as a housing site.

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?

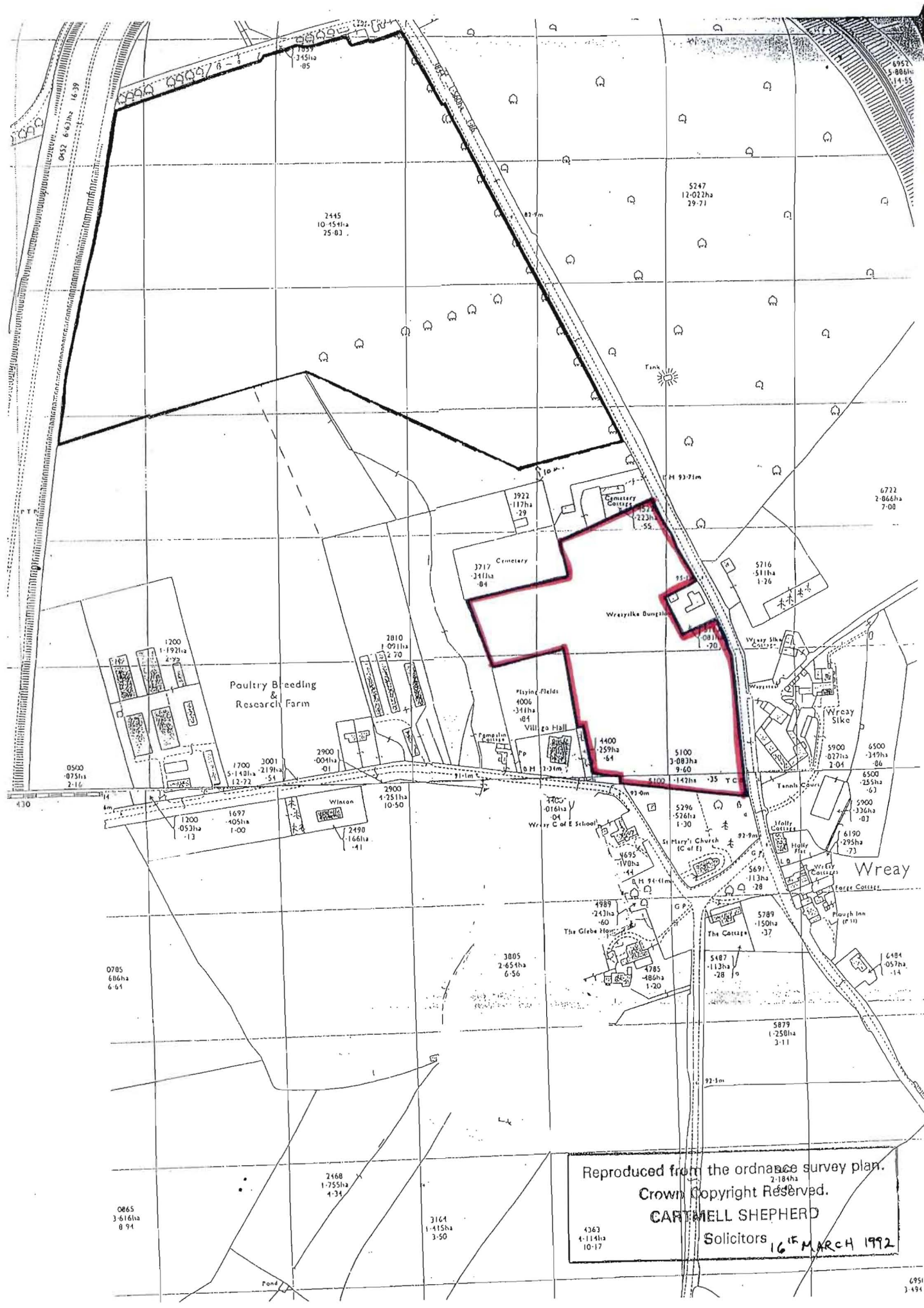
- ☐ No, I do not wish to participate at the hearing sessions of the examination
- ☒ Yes, I wish to participate at the hearing sessions of the examination

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

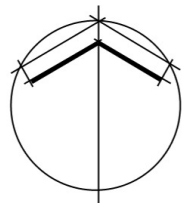
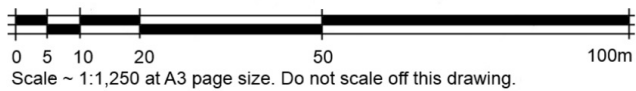
Please note it will be at the discretion of the Inspector to determine the content of the hearing sessions and who will be heard.

To discuss the merits of allocating my client's land.

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



Reproduced from the ordnance survey plan.
Crown Copyright Reserved.
CARTMELL SHEPHERD
Solicitors
16th MARCH 1992



Vista between Chapel of Rest and St Mary's Church retained

Drawing based on mapping from Emapsite
Crown copyright, all rights reserved 2014
License number 0100031673

Key

- Study area boundary
- Existing buildings
- Proposed dwellings (roof lines indicated)
- Existing vegetation
- Proposed trees
- Proposed hedges
- Proposed vehicle routes
- Existing footpaths and public rights of way
- Opportunities for new footpath links
- Opportunities for links between open spaces
- Existing and proposed open space (community space and open fields.)
- Proposed pond with capability for sustainable drainage.
- Proposed safety fence around pond



R01	17.04.2015	drawing title changed
R 00	16.04.2015	original drawing
revision	date	notes

drawing number 13

drawing name Indicative Layout Plan

project Housing at Wreay

client North Associates

Planning Carlisle's Future

Carlisle District Local Plan 2015-2030 Preferred Options Consultation – Stage Two Questionnaire

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Return completed questionnaires by Friday 4 April 2014



Investment and Policy, Economic Development, Carlisle City Council, Civic Centre, Carlisle, CA3 8QG



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Copies can be made of the response forms if you require more space, or you can simply continue on other sheets of paper, making clear which policy or site you are referring to.

	Personal Details	Agent's details (if applicable)
Title	Messrs	Mr.
First name		Sam
Last name	Osgood	Greig
Job title (if applicable)		Principal Planner
Organisation (if applicable)		Taylor and Hardy
Address	c/o Taylor and Hardy	9 Finkle Street, Carlisle
Postcode		CA3 8UU
Tel Number		01228 538886
Email address		sam.planners@taylorandhardy.co.uk

Part B: Your Comments

1) Local authorities have to update their Local Plan's to ensure that the communities aspirations for future development are achievable, based on up-to-date evidence about the economic, social and environmental prospects of the area. A large amount of evidence has been produced (available at www.carlisle.gov.uk/localplan) to help inform the plan, covering; Employment; Housing; Retail and Climate Change for example.

Based on the above, do you think the evidence that has been used for the Draft Local Plan is robust and credible? (Please tick)

Yes ☐ No ☐

Comment:

N/A

2) Local Plans are required to be in line with the National Planning Policy Framework (NPPF hyperlink). Do you think the Local Plan is consistent with National Planning Policy Framework? (Please tick)

Yes ☐ No ☐

Comment:

N/A

3) In order to prepare a Local Plan it is important that the Council carries out a Sustainability Appraisal and Habitats Regulations Appraisal in order to meet European Directive requirements by considering all of the likely significant effects that the plan may have on the environment, economic and social factors.

Having looked at the Sustainability Appraisal (SA) and Habitats Regulations Appraisal (available at www.carlisle.gov.uk/localplan) do you agree with:

the SA of the Local Plan so far?

Yes ☐ No ☐

Comment:

N/A

the Habitat Regulations Appraisal so far?

Yes ☐ No ☐

Comment:

N/A

Please complete Q4-Q6 for each policy or site you wish to make a representation/comment on. We have provided 10 additional comment sheets but please submit more information if you need to.

4) Which Policy/Site Allocation are you making representations/commenting on and do you wish to support/object/comment on the above? (please tick)

Policy Number/Site Allocation	Policy 16 (Housing Strategy and Delivery)	Support	
		Object	✓
		Comment	

5) Please state fully and clearly your comments and/or the reasons you are supporting/objecting to this part of the plan. Please complete a separate sheet for each policy/site allocation.

My client objects to the exclusion of their land, which is centrally located in the village of Wreay, as a proposed housing allocation (L.P.A. Reference No. 064).

The Council's assessment of my client's land concluded that their land was unsuitable for housing development on the basis that:

"The proposed site extends to some 3 hectares and is attractive, open parkland type landscape fringed by mature trees. There are open views to the Grade II * listed St Mary's Church to the south, and the Grade II * listed Sexton's Cottage to the north. The landscape impact of the development of this site, together with the impact on the listed buildings, is considered unacceptable. In addition, the site is wholly out of scale with the rest of the village."

Whilst the Council's assessment of the site refers describes the site as an ***"attractive, open parkland type landscape"*** it is working agricultural land, which has the potential to be used for a variety of agricultural purposes. The site's perceived attractiveness at the time of the Council's assessment should not influence whether or not the site should be developed.

Our previous submission, on behalf of our client, was clear that whilst the full extent of our client's ownership was identified, it was not proposed that all of the site should be developed. More importantly, it was suggested that the extent of land available would enable the site to be developed in a way that was sensitive to the setting of the listed buildings, but also the loosely arranged character of the village.

The availability of land, which can be served by various points of access, will enable this site to be developed in sensitive way that avoids the need for an ***"estate style"*** housing scheme. It is considered that this is one of the fundamental benefits that my Client's site offers over the proposed allocation in Wreay, which could appear as a small estate tagged onto the side of the village, wholly unrelated to the adjacent properties. Such a proposal would clearly be harmful to the setting of this historic village.

If the Council were minded to support the principle of allocating some of my Client's land for residential development my client has indicated a willingness for the southern extent of their land, which abuts the Grade II* listed St. Mary's Church to be designated as a village green/community space. This would improve pedestrian connectivity between the houses on the east of the village and the school on the west. It would also provide an important community facility that would otherwise not be delivered and would assist in safeguarding the setting of St. Mary's Church in perpetuity.

6) If objecting to a policy or site allocation, please indicate what change you are seeking to the plan which could resolve your objection.

The allocation of some of our client's land as a housing allocation, together with the formation of a village green/community area.

Our Ref : SG/J/C13/111b

11th September, 2013

Investment and Policy,
Carlisle City Council,
Civic Centre,
CARLISLE.
CA3 8QG

Dear Sir,

PLANNING CARLISLE'S FUTURE
DRAFT LOCAL PLAN 2015-2030
PREFERRED OPTIONS CONSULTATION

- **Policy 19 – Housing Strategy and Delivery;**
- **Land at the centre of Wreay, Carlisle.**

I am writing on behalf of my Clients, Messrs Osgood, to object to the document referred to above, with particular reference to Policy 19, Housing Strategy and Delivery.

My Clients own land in the centre of Wreay, which is identified, in red, on the enclosed plan. They object to the exclusion of their land from the list of sites allocated, under Policy 19, for residential development.

The Council has identified Wreay as a sustainable location that requires some residential development to support the existing services in the village, which include a primary school, a public house and a village hall.

Wreay is a traditional village that contains several significant Listed Buildings, including St. Mary's Church, which is a Grade II* Listed Building. There has been limited new development in Wreay and the majority of the buildings are traditional in appearance.

The buildings are loosely arranged and many of the dwellings have large gardens, thereby creating a sense of space in the village. The sense of openness is enhanced by open areas of grazing land and grassed public spaces. There are a number of significant, mature trees, which add to the village's rural character.

Wreay is a sensitive location and any new development, if not carefully considered, would be harmful to the character of the village.

On behalf of my Clients I have submitted a separate letter objecting to the site in Wreay which is allocated for residential development in the emerging Local Plan (L.P.A. Reference WREA1).

In summary, it is considered that the development of the allocated site to provide 10 dwellings would be harmful to the form and character of the settlement and would adversely affect the setting of St. Mary's Church, a Grade II* Listed Building.

It is considered that the land that is within my Clients ownership, which is available to be developed, offers a suitable, alternative, location for the provision of housing within Wreay.

The enclosed plan identifies all of the land that my Clients own at the centre of the village, although it is not proposed that the entire site is allocated for residential development. It is suggested that parcels of their land could be allocated for residential development to ensure that the location of any new development in Wreay is sensitive to the character of the village.

It is considered that the allocation of some of my Clients land for residential purposes:

- allows an opportunity for land to be brought forward in a sensitive manner that fully respects, and does not compromise, the setting and historic character of Wreay;
- is well related to the village;
- does not raise any significant highway related issues;
- could be developed without adversely affecting the living conditions of the occupiers of any adjoining residential properties; and
- complies with the thrust of the policy objectives contained within the National Planning Policy Framework.

The allocation of my Clients land for housing in the Local Plan 2015-2030 would be wholly appropriate. I would be grateful if you could contact me to discuss which parcels of their land could be brought forward for residential development.

I trust that the above will be given close consideration as matters progress.

I would be grateful if you would acknowledge receipt of this objection.

Yours faithfully,

SAM GREIG
Associate Planner

cc by email only to: Messrs Osgood.