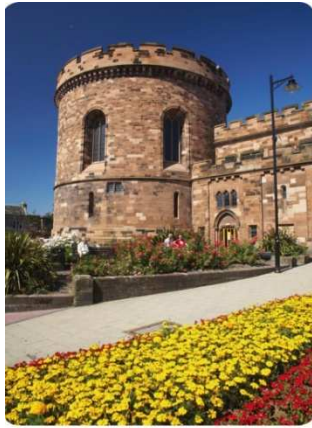


The Carlisle District Local Plan 2015-2030

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: Mr	Title: Ms
Surname: Walker	Surname: Diamond
Forename: M	Forename: Julie
Organisation/Company: North Associates	Organisation/Company: Taylor and Hardy Ltd
Address:	Address: North House, Kingstown, Carlisle.
Postcode:	Postcode: CA6 4BY
Contact No:	Contact No: 01228 538886
Email:	Email: julie.planners@taylorandhardy.co.uk
Signature: Julie Diamond	
Date: 21/04/15 (Further to your conversation with Sam Greig, I understand you are accepting late representations)	
☒ 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 and Appendix 1 (Sites Allocated under Policy HO1)			

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 <u>unsound</u>, is it because it is <u>not</u>:	
☒ 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.
My client, North Associates and the land owners object to the exclusion of their land from the list of sites allocated, under Policy HO1, for residential development. I wish to object to Policy HO1 and Appendix 1 (Sites Allocated under Policy HO1) due to the exclusion of my client's land as a suitable site for residential development.
The land the subject of this objection is located in the settlement of Cummersdale and is identified on the plan enclosed.
Cummersdale is a sustainable settlement which benefits from a number of local services such as a primary school, village hall, church and public house. The Council

has acknowledged the sustainable credentials of the village by virtue of its close proximity to Carlisle (and easy reach of services and facilities therein) and the location of two major employment providers in the locality. The Carlisle Rural Masterplan states:

“The proximity to the urban edge of Carlisle means the settlement no longer functions as a centre for agriculture. However local employment gives potential for living close to work and may justify growth.”

North Associates are a member of the House Building Federation (HBF) and they fully endorse the HBF’s strategic objection to the Proposed Submission Draft. This representation should be read in conjunction with the HBF’s response dated 17th April 2015. It does not reiterate the HBF’s objection, instead it identifies the reasons why the allocation the land is appropriate.

This representation should also be read in conjunction with the objection that North Associates has submitted in respect of Policy SP 2(Strategic Growth and Distribution).

In the context of the HBF’s strategic objection, it is clear that the ECDLP falls short of ensuring that the Plan “meets the full, objectively assessed needs for market and affordable housing in the market area”, as required by the NPPF (Paragraph 47).

In such cases, the Council must seek to allocate further housing growth in the most sustainable locations.

The ECDLP identifies only one site within Cummersdale as preferable for residential development, with a potential yield of only 14 dwellings (Site R7 – Land to east of Cummersdale Road).

My client’s site is identified within the Strategic Housing Land Availability Assessment (SHLAAA) as Site CUD04 - Land west of The Oval. The site was dismissed on a number of ground which cannot be justified.

The assertion that the land would represent a significant encroachment into the open countryside is arbitrary. Development to the west of Cummersdale would bring the settlement boundary closer to the built form of the urban area, and not towards open countryside. The Rural Masterplan acknowledges that the western edge of the settlement requires ‘softening’ due to the ‘stark edge’ formed by the Cresnet.

Access to my client’s site can be gained through Gilbert Road and is not reliant upon the ‘detached’ access onto Cummersdale Road.

In the context of all matters addressed above, my client considers that the exclusion of their site in the Site Allocation process is unjustified. The Council has failed to ‘plan positively’ by under-estimating the required housing need for the

District, under allocating suitable sites and failing to recognise the sustainable benefits of my clients site.

The ECDLP cannot be considered sound in accordance with the required tests of the NPPF.

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:

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?

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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.

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

