



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: Ms	Title:
Surname:Cohen	Surname:
Forename:Rosanna	Forename:
Organisation/Company:NHS Property Services	Organisation/Company:
Address:Parkway 1, Parkway Business Centre, Princess Road, Manchester M14 7LU	Address:
Postcode:M14 7LU	Postcode:
Contact No:07880471875	Contact No:
Email:rosanna.cohen@property.nhs.uk	Email:
Signature: ROSANNA COHEN	
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:

Chapter 8, Policy CM1 and Policy CM3

Q2. Do you consider that the Local Plan is:

Legally Compliant?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
---	-----------------------------

Sound?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> 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.

Policy CM1 'Healthcare Provision'

We welcome the Council's support for new healthcare facilities to be planned alongside the delivery of new housing within the district, and agree that it is important that sites for the provision of health care facilities are accessible by public transport to ensure inclusive and sustainable healthcare provision for communities. NHS PS supports an approach which ensures that there are sufficient healthcare facilities to support housing growth and welcomes future discussions on this matter. NHS PS' main point of contact in Cumbria for Strategic Estates Planning is Andrew McMinn (Andrew.McMinn@property.nhs.uk).

NHS PS encourages policies which enable flexibility within healthcare service

provision and suggest that the policy acknowledges that the expansion or re-provision of existing services would be the preferred approach to accommodating growth in the area, rather than developing new facilities. New healthcare facilities can attract considerable running costs which are accounted for by the NHS and do not always provide best value for money in the long term.

Policy CM3 'Sustaining Community Facilities and Services'

The policy does not make specific reference to healthcare facilities as community facilities and greater clarification is needed within the policy to avoid misinterpretation; however, we assume they are included in this category of development.

The NHS requires flexibility in its estate and in particular, the ability to dispose of unneeded or unsuitable sites and properties for best value. This is an important component in funding new or improved facilities for public services within an area, and the definition of healthcare facilities as 'community facilities' as currently implied by the policy would have a considerable impact on the NHS' ability to re-provide future services for the community.

The relocation of healthcare services and subsequent disposal of existing surplus facilities should not be subjected to restrictive policies concerning 'community facilities' where this could delay necessary investment in more modern and fit for purpose facilities in the area. We therefore propose a revision to the policy which acknowledges that the need to dispose of a healthcare facility by the NHS should be taken as evidence that the services are surplus to requirements and are no longer viable, and the assumption should be made that adequate replacement services are being provided.

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?

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.

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