



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.

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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: Dr	Title:
Surname:Willshaw	Surname:
Forename:Kate	Forename:
Organisation/Company:Friends of the Lake District	Organisation/Company:
Address:Murley Moss Oxenholme Road Kendal	Address:
Postcode:LA9 7SS	Postcode:
Contact No:01539 720788	Contact No:
Email:kate-willshaw@fld.org.uk	Email:
Signature: K. Willshaw	
Date:20/04/2015	
<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 type="checkbox"/> Chapter	<input type="checkbox"/> Figure
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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

GI 2

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.

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Friends of the Lake District supports GI 2

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:

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GI 1

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
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Friends of the Lake District is fully supportive of GI 1 and we are particularly pleased to see mention of the importance of Dark Skies in the north and east of the District.

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Appendix 1 R3

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
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- | |
|---|
| <input type="checkbox"/> Positively Prepared? |
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Friends of the Lake District does not object to the principle of allocation on part of this site, but does object to the large north-western extent of the allocation. This is because it will extend the town into open countryside of high landscape value, well outside of the current boundaries of the settlement as defined along the A6071 and Howard/Dacre Road.

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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:

Friends of the Lake District suggests that the site is reduced in size so that it relates better to the existing settlement in the north of Brampton (e.g. as shown on the map to the right).

There are a number of mature trees and hedgerows on this site. These should be noted in the site profile and should be retained in any development.

Should the allocation extend across the whole of the site, areas of open space should be identified for green infrastructure/recreation/biodiversity purposes

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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GI 4

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
---	--	-----------------------------

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- ☐ Positively Prepared?
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Friends of the Lake District fully supports GI 4

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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Appendix 1

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☒ Yes ☐ No

Sound?

☐ Yes ☒ Yes, with minor changes ☐ No

Q3. If you consider the Local Plan is unsound, is it because it is not:

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Friends of the Lake District still has concerns regarding the allocation of land south of Carlisle Road in Brampton which we raised in both of our previous consultation responses. We consider that this allocation is too large and stretches too far into the open countryside and will have a negative impact on the landscape character of the area. This allocation would be more acceptable if it did not extend so far south and rounded off in line with the houses on Greenhill.

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The allocation should be rounded off as shown in the map we included in our response to the 2013 Preferred Options consultation

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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<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
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|---|
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We are concerned that there is not more emphasis on including small-scale/micro renewables in new development (e.g. solar, property or district level biofuel heating, ground and air source heat pumps) all of which are much easier and cheaper to deploy in new build than retrofit.

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:

This policy should specifically state that new development should where possible incorporate micro-renewables as going a way towards meeting the zero carbon target for new-build. It would also go some way towards reducing the need for larger scale renewables which have a damaging effect on the landscape, biodiversity and cultural heritage of the district.

Household scale renewables also help with social and health targets as they will help to reduce fuel poverty and mean that people can heat their homes and businesses whilst paying less for fuel. It is also far cheaper to incorporate micro-renewables in new build than it is to retrofit.

We would like to see this policy changed and also linked through to Policy SP6 Securing Good Design on which we have also made comments.

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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To argue for micro renewables on new build as we do not feel that support for this is strong enough within the document. Also to argue that micro-renewables reduces the need for large-scale renewables which can have damaging landscape, cultural heritage and biodiversity impacts.

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In writing: Investment and Policy
Carlisle City Council
Civic Centre
Carlisle
Cumbria
CA3 8QG

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Title: Dr	Title:
Surname:Willshaw	Surname:
Forename:Kate	Forename:
Organisation/Company:Friends of the Lake District	Organisation/Company:
Address:Murley Moss Oxenholme Road Kendal	Address:
Postcode:LA9 7SS	Postcode:
Contact No:01539 720788	Contact No:
Email:kate-willshaw@fld.org.uk	Email:
Signature: K. Willshaw	
Date:20/04/2015	
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PART TWO - YOUR REPRESENTATION

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Q1. To which part of the document does this representation relate?

<input type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input checked="" type="checkbox"/> Chapter	<input type="checkbox"/> Figure
---------------------------------	------------------------------------	---	---------------------------------

Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

10 Green Infrastructure Objective and Context

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☒ Yes ☐ No

Sound?

☒ Yes ☐ Yes, with minor changes ☐ No

Q3. If you consider the Local Plan is unsound, is it because it is not:

- ☐ Positively Prepared?
- ☐ Justified?
- ☐ Effective?
- ☐ Consistent with National Policy?

Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

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Friends of the Lake District supports the Green Infrastructure Objective on page 193

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:

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---------------------------------	---	----------------------------------	---------------------------------

Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

7.25

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 checked="" 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:

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Friends of the Lake District strongly supports this paragraph acknowledging the benefits of energy efficient buildings. We would like to see this go further and link microrenewables into this paragraph as they would fit under the "resilience" heading of the Policy and also with the mention of small-scale renewables in the Policy CC3 wording in the blue box.

--

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:

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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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To argue for micro renewables on all new build as a matter of course. We do not feel that support for this is strong enough within the document. Also to argue that micro-renewables reduces the need for large-scale renewables which can have damaging landscape, cultural heritage and biodiversity impacts.

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--	------------------------------------	----------------------------------	---------------------------------

Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

GI 6

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.

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Friends of the Lake District fully supports GI 6

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:

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☐ **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:

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<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:

GI 3

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.

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Friends of the Lake District fully supports GI 3 and we are pleased to see the guidance provided in this policy for developers regarding surveys, mitigation and where and how to get ecological data. This is a really well written and helpful policy.

--

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?

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

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--	------------------------------------	----------------------------------	---------------------------------

Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

CC2

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 checked="" 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?
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There is no specific mention of the two AONBs - they should either be specifically included in the landscape paragraph (1) or given their own paragraph. (cf para 4 which specifically mentions Hadrian's Wall and SAMs)

--

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:

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Signature: K Willshaw	
Date:20/04/15	
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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 SP5 paragraphs 5 and 8

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 checked="" 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:

- | |
|---|
| <input type="checkbox"/> Positively Prepared? |
| <input checked="" type="checkbox"/> Justified? |
| <input checked="" type="checkbox"/> Effective? |
| <input type="checkbox"/> Consistent with National Policy? |

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Friends of the Lake District has concerns about the development of a southern relief road as stated in paragraph 5. There is good evidence to show that road building increases traffic and stops a modal shift away from road transport. We are therefore concerned that the implementation of a southern relief road will actually mitigate against the avowed aims stated in the Local Plan to increase travel on foot, cycle and public transport. We are also concerned about the impact that a new road will have on the landscape and natural environment to the south of Carlisle.

Withy regard to Paragraph 8, Friends of the Lake District continues to maintain an objection to the development of Carlisle Airport on the grounds of landscape damage

and climate change.

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:

Remove proposals for development of a southern relief road from the Local Plan.

Remove support for development of Carlisle Airport from the Local Plan.

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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Forename:Kate	Forename:
Organisation/Company:Friends of the Lake District	Organisation/Company:
Address:Murley Moss Oxenholme Road Kendal	Address:
Postcode:LA9 7SS	Postcode:
Contact No:01539 720788	Contact No:
Email:kate-willshaw@fld.org.uk	Email:
Signature: K Willshaw	
Date:20/04/2015	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

PART TWO - YOUR REPRESENTATION

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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 SP5 paragraphs 1, 2 and 7 and supplementary paragraph after 8.

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.

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Friends of the Lake District supports these parts of this policy

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:

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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

SP8

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:

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- ☐ Effective?
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Friends of the Lake District fully support policy SP8.

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:

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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Spatial Portrait paragraphs 2.10, 2.12 and 2.13

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
---	--	-----------------------------

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Friends of the Lake District supports that spatial portrait of the District's natural environment as laid out in these paragraphs.

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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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 SP6

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 checked="" 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:

- | |
|---|
| <input type="checkbox"/> Positively Prepared? |
| <input type="checkbox"/> Justified? |
| <input checked="" type="checkbox"/> Effective? |
| <input 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.

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Friends of the Lake District is concerned that without specific support for property based renewables (e.g. solar p.v. solar thermal, ground and air source heat pumps, biofuel), the Securing Good Design policy will not secure sustainable design and construction techniques. It is much easier to incorporate micro-renewables at the construction stage than to retrofit, and if Carlisle is serious about sustainable housing, then pushing for incorporation of microrenewables at the design stage should be part of the local plan.

The rest of the policy is good and in particular we support paragraphs 2, 3, 8, 9 and 10.

--

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:

Add a paragraph to the policy saying that micro-renewables are positively encouraged as part of securing good, sustainable design.

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:

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Explore this matter in more detail as we have also picked it up in our responses to Policies SP9, CC1 and CC3

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Signature: K. Willshaw	
Date:20/04/15	
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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:

IP2

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 checked="" 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:

- | |
|---|
| <input type="checkbox"/> Positively Prepared? |
| <input type="checkbox"/> Justified? |
| <input checked="" type="checkbox"/> Effective? |
| <input 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.

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Friends of the Lake District supports Policy IP2's development priorities for cyclists and pedestrians along with integrated public transport.

The reason we feel that the policy is sound but with minor changes is that it should be cross-referenced with the Green Infrastructure policies which elaborate on pedestrian and cycle transport links

--

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:

Link the policy with the Green Infrastructure objectives for multifunctional and integrated networks.

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?

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☐ **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:
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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

IP1

Q2. Do you consider that the Local Plan is:

Legally Compliant?

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

Sound?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
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- | |
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IP1 needs to link to the Green Infrastructure policies. At the moment, they are totally separate in the document, but as development of Green Infrastructure has similar implementation issues as Grey Infrastructure, it would be sensible to acknowledge this link in the policy wording even if this is to point out that new development must ensure that there is sufficient Green Infrastructure in place to support it.

--

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:

Either add a sentence referring to GI into the first paragraph or add a bullet into Justification Paragraph 6.2 stating "Green Infrastructure (see Green Infrastructure Policies)

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?

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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Policy SP6

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 checked="" type="checkbox"/> Yes, with minor changes	<input type="checkbox"/> No
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Q3. If you consider the Local Plan is unsound, is it because it is not:

- | |
|---|
| <input type="checkbox"/> Positively Prepared? |
| <input type="checkbox"/> Justified? |
| <input checked="" type="checkbox"/> Effective? |
| <input 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.

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Friends of the Lake District strongly supports paragraphs 1, 2, 5, 6 and 7 of Policy SP9.

However, we think that there should be further elaboration of paragraph 7 with specific support for property based renewables (e.g. solar p.v. solar thermal, ground and air source heat pumps, biofuel) to specify how renewable and decentralised energy should be generated. Healthy and thriving communities can be aided by reducing fuel poverty which reduces inequality and promotes better health by using micro-renewables incorporated into new-build. Property-based renewables would also go much of the way towards ensuring that zero-carbon housing targets are met.

It is far cheaper to install renewables during the build process than it is to retrofit. It seems as if there has been a missed opportunity here.

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:

Add a paragraph to the policy saying that micro-renewables are positively encouraged as part of securing good, sustainable design and promoting healthy and sustainable communities.

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:

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Explore this matter in more detail as we have also picked it up in our responses to Policies SP6, CC1 and CC3

**Thank you for your time to complete and return this Representation form.
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The Carlisle District Local Plan 2015-2030

Proposed Submission Draft Consultation Representation Form



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

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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: Dr	Title:
Surname:Willshaw	Surname:
Forename:Kate	Forename:
Organisation/Company:Friends of the Lake District	Organisation/Company:
Address:Murley Moss Oxenholme Road Kendal	Address:
Postcode:LA9 7SS	Postcode:
Contact No:01539 720788	Contact No:
Email:kate-willshaw@fld.org.uk	Email:
Signature: K. Willshaw	
Date:20/04/2015	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

PART TWO - YOUR REPRESENTATION

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Q1. To which part of the document does this representation relate?

<input 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:

Strategic Objectives: Spatial Strategy and Strategic Policies page 18

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☒ Yes ☐ No

Sound?

☒ Yes ☐ Yes, with minor changes ☐ No

Q3. If you consider the Local Plan is unsound, is it because it is not:

- ☐ Positively Prepared?
- ☐ Justified?
- ☐ Effective?
- ☐ Consistent with National Policy?

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Friends of the Lake District fully supports paragraph three of the Strategic Objectives: Spatial Strategy and Strategic Policies page 18

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Title: Dr	Title:
Surname:Willshaw	Surname:
Forename:Kate	Forename:
Organisation/Company:Friends of the Lake District	Organisation/Company:
Address:Murley Moss Oxenholme Road Kendal	Address:
Postcode:LA9 7SS	Postcode:
Contact No:01539 720788	Contact No:
Email:kate-willshaw@fld.org.uk	Email:
Signature: K. Willshaw	
Date:20/04/2015	
<input checked="" type="checkbox"/> Please indicate if you wish to be updated on the progress of the Local Plan	

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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

Climate Change and Flood Risk objective

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☒ Yes ☐ No

Sound?

☒ Yes ☐ Yes, with minor changes ☐ No

Q3. If you consider the Local Plan is unsound, is it because it is not:

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Friends of the Lake District fully supports this objective of making the District resilient to the effects of climate change.

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Surname:Willshaw	Surname:
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Organisation/Company:Friends of the Lake District	Organisation/Company:
Address:Murley Moss Oxenholme Road Kendal	Address:
Postcode:LA9 7SS	Postcode:
Contact No:01539 720788	Contact No:
Email:kate-willshaw@fld.org.uk	Email:
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Date:20/04/2015	
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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

EC10

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
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Friends of the Lake District supports the environmental safeguards that this policy will implement.

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