

Consultee Ref 103

Rep Ref 0393-0394

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:
Surname: Struthers	Surname:
Forename: Ian	Forename:
Organisation/Company:	Organisation/Company:
Address: 2 Hill Head, Scotby	Address:
Postcode: CA4 8BH	Postcode:
Contact No: [REDACTED]	Contact No:
Email: [REDACTED]	Email:
Signature: [REDACTED]	
Date: 19/4/2015	
Please indicate if you wish to be updated on the progress of the Local Plan	
YES	

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:			

Q2. Do you consider that the Local Plan is:		
Legally Compliant?		
Yes		
Sound?		
No		

Q3. If you consider the Local Plan is <u>unsound</u>, is it because it is <u>not</u>:
Justified

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.

I believe the Housing Policy HO1 and the inclusion of site R15 (Hill Head, Scotby) is unjustified, resulting in the draft Local Plan considered unsound. My reasons are as follows:-

The Carlisle District forecast of 565 houses being built per year is unrealistically high and exceeds by 54% the average of 367 houses per year built over the last twenty years. The inclusion of the site is simply not required to meet the housing needs of Carlisle.

The site abuts the northern edge of Scotby village and as such its development would adversely effect the attractive landscape and setting of the village from the A69.

The site extends into open countryside, resulting in any development being seen as an unwarranted and unnecessary intrusion into the landscape. Furthermore, the proposed development would have an adverse effect on the various fauna and birdlife which is under threat without such developments such as this anyway. This would make the situation worse and totally fly in the face of the ethos of green belt benefits.

The greenfield site consists of high quality Grade 2 agricultural land which is actively farmed and makes a useful contribution to food security and the rural economy. Indeed, this land was always intended by Lady Lonsdale to continue to be used for agricultural purposes only.

The site was rejected in the Local Plan consultation last Spring, resulting in most residents being currently unaware of this latest proposal.

The development of this site would have an adverse impact on the amenities of the properties along Hill Head and Scotby Road and on the residents' enjoyment of their homes and quality of life. The inclusion of land behind Holme Close was rejected on amenity grounds and for consistency, so should the proposed Hill Head site.

There is a potential drainage problem on the site as identified by United Utilities and the Environment agencies. There are known flooding problems along Scotby Road due to the lack of capacity in the foul/surface water sewers. Additionally, drains have backed up in Hill Head due to the diameter of the sewer pipe.

Development of the site would undermine the council's policy of trying to encourage urban regeneration in Carlisle, in particular in bringing forward under used and derelict sites and encouraging re-investment in the older housing neighbourhoods.

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:

Reduce the upper housing target in line with past trends and delete R15 site allocation from the 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?

The Sustainability Appraisal did not take account of the impact of the proposed development of this site on the adjoining residents' amenities and on its landscape, its setting and its agricultural value.

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

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.