

Consultee Ref 112
Rep Ref 0411 - 0412

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: Mrs	Title:
Surname: Rudd	Surname:
Forename: Fiona	Forename:
Organisation/Company:	Organisation/Company:
Address: 18 Hill Head Scotby Carlisle	Address:
Postcode: CA4 8BH	Postcode:
Contact [REDACTED]	Contact No:
Email: [REDACTED]	Email:
Signature [REDACTED]	
Date: 17.04.15	
☒ Please indicate if you wish to be updated on the progress of the Local Plan	

see 2 attached fronts JJ Brown and James Johnstone

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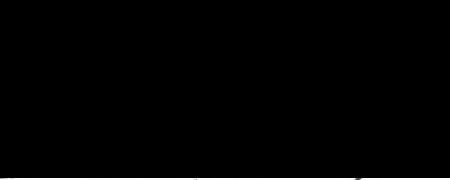
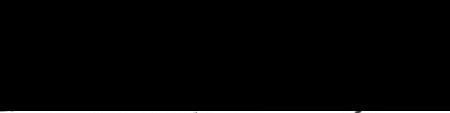
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Your Details	Your Agent's Details (If applicable)
Title:	Title:
Surname:	Surname:
Forename:	Forename:
Organisation/Company:	Organisation/Company:
Address: J. J. BROWN. 26. HILL HEAD SCOTBY EARLISHA	Address:
Postcode: CA4 8BH	Postcode:
Contact No:	Contact No:
Email:	Email:
Signature 	
Date: 19.4.2015	
☐ Please tick if you wish to be updated on the progress of the Local Plan	

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Your Details	Your Agent's Details (If applicable)
Title: MR	Title:
Surname: JOHNSTONE	Surname:
Forename: JAMES	Forename:
Organisation/Company:	Organisation/Company:
Address: 24 Hill Head Scotby	Address:
Postcode: CAH 8BN	Postcode:
Contact No: 	Contact No:
Email: 	Email:
Signature: 	
Date: 19th April 2015	
☐ Please tick 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:

Policy H01 and R15

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.

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 that the Housing Policy H01 and the inclusion of site R15 (Hill Head Scotby) is not justified, resulting in the local plan being unsound. My reasons are as follows:

The Carlisle and 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 20 years. The inclusion of this site is not required in order to meet the housing needs of Carlisle.

The site abuts the Northern edge of Scotby village and such its development would adversely affect 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. The local plan is supposed to remove sites in open countryside in the initial sift and indeed the Hill Head Plan was rejected in spring 2014.

The greenfield site consists of high quality Grade 2 agricultural land, the highest quality in Cumbria, which is actively farmed and makes a useful contribution to food security and the rural economy.

The site was rejected in the Local Plan consultation last spring, resulting in many residents being 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 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 Hill Head site

Hill Head is already restrictive for traffic when residents park outside their homes and when wider vehicles use the road. The road is simply too narrow to support the increase in traffic a new development would bring.

The proposed access to the site, (the lane from Hill Head) was not built to take the volume of traffic the new development would bring and is not wide enough to take a road for two way traffic and pavements. The two houses adjacent to this lane were built with the only vehicular access being from this lane. If this lane were to be turned into an access road, getting in and out of these properties would not be safe as it would mean turning out of the driveway on a blind corner. The development would also have an extremely adverse effect on these residents' enjoyment of their homes and quality of life. The Plan states 'the proposed access will require upgrading to be wide enough for two way traffic and pedestrian footways'. As the proposed access is bordered by residents' gardens, there is no room to widen it, therefore it can only remain too narrow.

There is a potential drainage problem on this 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. In addition, the main drain in Hill Head has previously backed up due to the narrowness 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 underused and derelict sites and encouraging re-investment in the older housing neighbourhoods.

Previous surveys in Hill Head have found evidence of subsidence in the area. The building development could surely exacerbate this problem and affect the current housing in Hill Head.

A significant number of houses has already been built within the village of Scotby with more planned. The roads around the village are already congested and those around the school, which will presumably need to expand further, should more housing be built, are virtually unusable at certain times of the day. They are simply too narrow to cope with the increased volume of traffic.

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

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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?

The Sustainability Proposal did not fully take into account the likely impact of the proposed development of this site on the adjoining residents' amenities, quality of life, its setting and agricultural views.

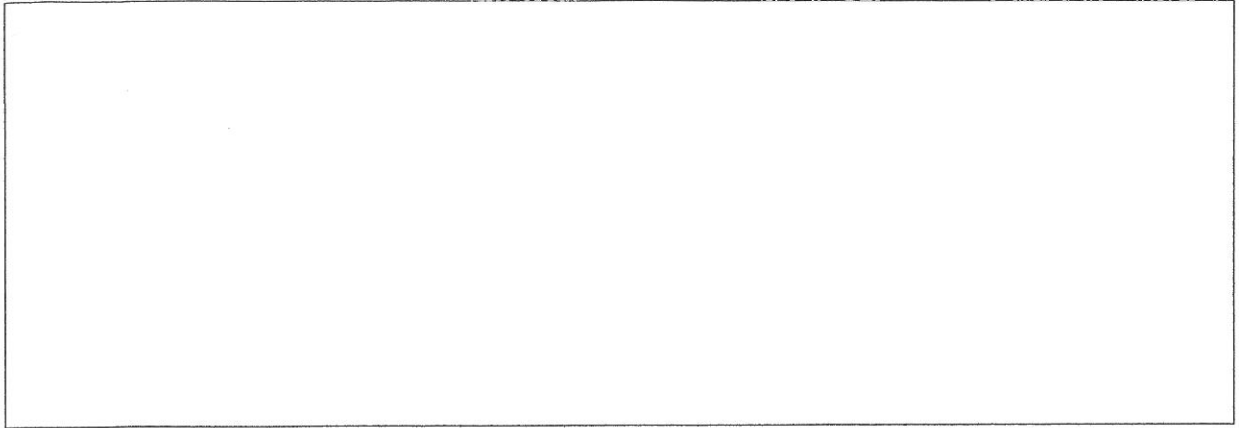
Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?

- ☒ 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.**