

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:
Surname:Hewitson	Surname:
Forename:Jeremy	Forename:
Organisation/Company:Carlisle City Council (Housing)	Organisation/Company:
Address:Civic Centre, Rickergate, Carlisle	Address:
Postcode:CA3 8QG	Postcode:
Contact No:01228 817519	Contact No:
Email:jeremy.hewitson@carlisle.gov.uk	Email:
Signature: Jeremy Hewitson	
Date:08/04/15	
☒ 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
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Please specify which Policy, Paragraph, Chapter or Figure you are referring to:

HO4

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☒ Yes	☐ No
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Sound?

☐ Yes	☒ Yes, with minor changes	☐ No
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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.

Whilst previous input into the development of the housing policies within the emerging Local Plan has been welcomed, there are a small number of additional amendments considered necessary the need for which have come to light owing to a better understanding of the introduction of national thresholds for when affordable housing can be sought.

Following further analysis of the boundaries illustrated in Figure 2 on page 110 of the Local Plan within the context of Policy HO4, particularly in light of the implications of nationally imposed thresholds within Planning Practice Guidance, it is considered that two parts of the urban area currently shown within Zone A should instead be re-categorised as being within Zone C. This reflects that owing to these being urban areas, the PPG makes clear that the lowest threshold for seeking affordable

provision is 11 or more units (this can only be lowered in designated rural areas which these areas are not). Zone A currently asks for provision on sites of 6 or more units which is not therefore consistent with national policy.

The first sentence of the third paragraph currently clarifies that on sites of between 6 and 10 units, contributions to affordable housing provision will be in the form of a commuted financial payment. Given that this circumstance would only arise in Zone A, it is considered that the policy would read more logically if this text was moved to criterion 1 within the 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:

Criterion 1 of Policy HO4 should instead be amended to read:

1. within Zone A, all sites of six units and over will be required to provide 30% of the units as affordable housing **- for sites of between six and ten units, the affordable housing contribution will be sought in the form of cash payments which will be commuted until after completion of units within the development;**

Consequently the third paragraph should be amended as follows:

~~For sites of between six and ten units, the affordable housing contribution will be sought in the form of cash payments which will be commuted until after completion of units within the development.~~ For sites of 11 units or over, the affordable housing should be provided on the application site unless off site provision, or a financial contribution of broadly equivalent value in lieu of on-site provision, can be robustly justified by local or site specific circumstances.

Figure 2 should be amended to include additional areas within Zone C as illustrated in the enclosed revised Figure.

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?

No

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

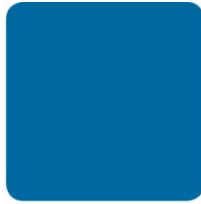


Yes, I wish to participate at the hearing sessions of the examination

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.**



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Your Details	Your Agent's Details (If applicable)
Title: Mr	Title:
Surname:Hewitson	Surname:
Forename:Jeremy	Forename:
Organisation/Company:Carlisle City Council (Housing)	Organisation/Company:
Address:Civic Centre, Rickergate, Carlisle	Address:
Postcode:CA3 8QG	Postcode:
Contact No:01228 817519	Contact No:
Email:jeremy.hewitson@carlisle.gov.uk	Email:
Signature: Jeremy Hewitson	
Date:08/04/15	
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Q1. To which part of the document does this representation relate?

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

5.45

Q2. Do you consider that the Local Plan is:

Legally Compliant?

☒ Yes	☐ No
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Sound?

☐ Yes	☒ Yes, with minor changes	☐ No
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Q3. If you consider the Local Plan is unsound, is it because it is not:

- | |
|---|
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| ☒ Effective? |
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Some relatively minor revisions to paragraph 5.45 are considered necessary to ensure that Policy HO5 can be implemented as intended. Reference to more than one parish reflects that a site can be on or close to a parish boundary and therefore legitimately meet need in adjoining parishes in these circumstances. As currently worded paragraph 5.45 could be interpreted as being too restrictive in some locations and constrain the affordable housing simply to the parish within which the site is located which is evidently inflexible and would potentially exclude intended occupiers i.e. those with a local connection.

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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:

Amend paragraph 5.45 as follows:

The S106 must include the name of the parish **or parishes within the appropriate area (usually the relevant Housing Market Area)** where the local **affordable housing** need has been identified. It may also include a list of neighbouring parishes, **wards or wider geography** to be referred to if, at some point in the future, one or more of the houses becomes vacant and there are no applicants from the parish **or parishes**.

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?

No

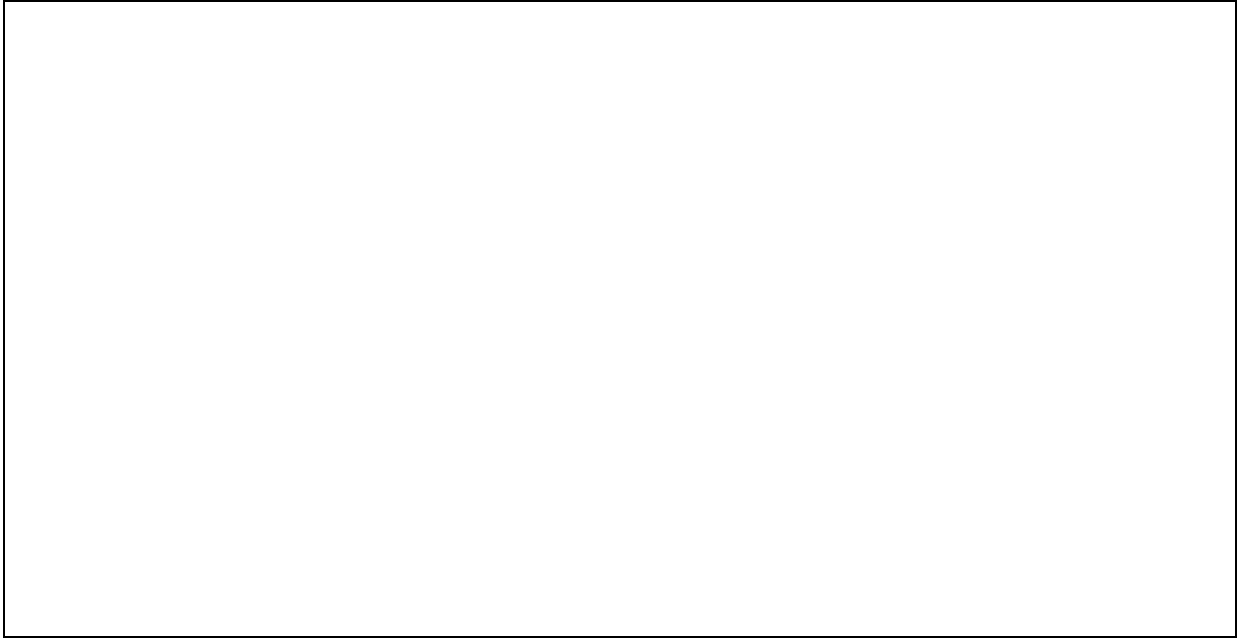
Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?

- ☒ **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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