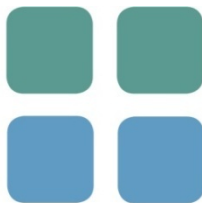
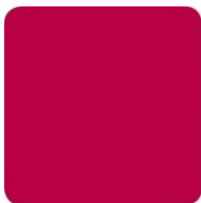




The Carlisle District Local Plan 2015-2030

Proposed Main Modifications (March 2016)

Consultation Representation Form



CARLISLE
CITY COUNCIL



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

INSTRUCTIONS

The Carlisle District Local Plan Schedule of Main Modifications, arising from the recent Examination in Public, includes a series of changes to the published Carlisle District Local Plan 2015-2030. These suggested changes are being consulted on for a period of six weeks. **For advice on how to respond to the consultation, and how to fill in this form, please see the accompanying guidance note on the Council's website at <http://www.carlisle.gov.uk/planning-policy>**

Please note all representations must be received by no later than **17:00 on Monday 25th April 2016**. 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. Please use a separate form for each Proposed Main Modification that you wish to comment on. It is important that your responses relate only to the Proposed Main Modifications or any associated Sustainability Appraisal or Habitat Regulation Assessment matters. Representations relating to other parts of the Plan will not be considered.

A copy of the Schedule of Main Modifications and all supporting documentation, including the Sustainability Appraisal and Habitat Regulation Assessment Addendums, are available to view at <http://www.carlisle.gov.uk/planning-policy>

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 Proposed Main Modifications, it would be helpful if these could make a single representation. It would also be useful if, in such circumstances, you state how many people/groups the submission is representing and how the representation was authorised.

Your Details	Your Agent's Details (If applicable)
Title: c/o Agent	Title: Mr
Surname: Click here to enter text.	Surname: White
Forename: Click here to enter text.	Forename: Robert
Organisation/Company: The Scotts Company (UK) Limited	Organisation/Company: White Peak Planning
Address: Salisbury House Weyside Park Godalming Surrey Postcode: GU7 1XE	Address: Didsbury Business Centre 137 Barlow Moor Road Didsbury Postcode: M20 2PW
Contact No: Click here to enter text.	Contact No: Click here to enter text.
Email: Click here to enter text.	Email: robw@whitepeakplanning.co.uk
Signature: Click here to enter text.	
Date: 23 rd April 2016	
☐ Please tick if you are not already on our mailing list but would like to be kept updated on the progress of the Local Plan	

PART TWO - YOUR REPRESENTATION

Please use a separate form for each Proposed Main Modification that you wish to comment on. It is important that your responses only relate to the main modifications and not to other parts of the Plan.

Q1. Please give the Proposed Main Modification reference your comment relates to

Main Modification reference – MM 02

Q2. Do you consider that the Proposed Main Modification to the Local Plan addresses the following in relation to the policy(s) concerned;

Legally Compliant?

☒ Yes ☐ No

Sound?

☐ Yes ☐ Yes, with minor changes ☒ No

Q3. If you consider the Local Plan remains or is unsound in light of the Proposed Main Modification, 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 in light of the Proposed Main Modification. 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 reasoning.

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.

MM02 proposes approximate proportionment of growth in rural and urban areas. We object to this method as it will serve to restrict development by applying unnecessary burdens on aspirations for growth. Windfall development is considered to provide an annual average of at least 100 dwellings as revised in EL4.001. The LPA is relying on windfall contributions to help deliver the overall housing requirement, restrictions imposed to distribution in this manner will impact upon capability for contributions to be met.

Carlisle City Council (CCC) is unable to identify a five year supply of deliverable housing land based on a robust OAN figure. The annual average housing need of 565 dwellings/annum was included in Policy SP2 of the submission version of the Local Plan (SD001). The annual figure was consistent with the findings of the 2014 Strategic Housing Market Assessment (SHMA) and 2014 PopGroup modelling completed by an independent body and accepted as the OAN.

It was confirmed by the inspector at EL1.002a, Question 6 that there has been persistent under delivery of housing in Carlisle. Where there is persistent under delivery, a 20% buffer should be applied, specifically to the first five years of the plan period and is known as the Sedgefield approach. This approach is consistent with paragraph 47 of the NPPF and paragraph 035 of the National Planning Practice Guidance (NPPG), to boost significantly the supply of housing.

As shown in EL3.002, using the Sedgefield approach CCC can only provide 4.36 years supply of housing land based on the OAN of 565 dwellings/annum. The evidence confirms that CCC are unable to meet their OAN. Where this need cannot be met within the local planning authority (LPA) boundary the NPPG makes provision to work with neighbouring authorities, however the guidance does not include any other mechanisms to address unmet need. CCC has not sought to work with other LPAs to address this need instead opting to use a less robust method of delivery to circumvent the aims of national policy.

CCC have cited a lack of capacity in the development industry and job-growth to be stronger post 2020 as reasons to phase delivery (EL1.005e paragraphs 2.12 and 2.4). At paragraph 5.1 CCC confirm their commitment to helping expand the development industry and increase capacity and have identified this as critical to realising housing and economic objectives. However, this position is contrary to having broad policy restrictions on the location of potential development.

The proposed urban/rural split in policy SP2 is not based on constraints and simply provides a blanket restriction. This type of high level policy constraint will continue to restrict developers capacity to engage with the Carlisle housing market. In addition, with the reliance on windfall development the restriction will significantly impact upon SME and self-build developers who will not have the confidence to take on development opportunities, which is contrary to the national support for this portion of the industry.

National government is currently taking steps to increase support for SME and self-build builders through proposed planning reforms, including revisions to the NPPF and changes through the Housing and Planning Bill. Contributions by these builders would support the local economy and help deliver the OAN housing figure. The

increase in development opportunities would support the development industry in line with CCC's aim at paragraph 5.1 of EL1.005e.

We contest the main modification put forward by CCC, consider it to be unsound and consequently it should be amended.

Q5. Please set out what alternative/additional 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 suggested revised wording. Please be as precise as possible:

The restriction on broad development locations is not justified. There is no substantive requirement to have this policy restriction as development can be controlled satisfactorily through the remaining development management policies within the Local Plan. We propose that the wording of criterion 1a of this policy is removed.

Q6. Do you have any comments on the supporting documents, such as the Sustainability Appraisal Addendum or the Habitats Regulations Assessment Addendum?

None

Q7. Any issues raised on the Main Modifications will be considered as written representations by the Inspector. Further hearing sessions will only be scheduled exceptionally. However please indicate whether you wish to appear at an examination hearing session if necessary?

☒ Yes ☐ No

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