



# THE HOME BUILDERS FEDERATION

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

Date: 20<sup>th</sup> April 2015

Email: [lpc@carlisle.gov.uk](mailto:lpc@carlisle.gov.uk)

**Sent by Email only**

Dear Sir / Madam,

## Carlisle District Local Plan

1. Thank you for consulting with the Home Builders Federation (HBF) on the Carlisle District Local Plan.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. **The HBF would like to attend the examination hearing sessions to discuss the following comments in greater detail.**

## Plan Period

4. The plan is unsound as it will not be effective in delivering the strategy over the time horizon of the plan. It is recommended that the plan period be extended beyond 2030 to ensure a minimum of 15 years from the adoption.
5. The plan period is identified as 2015 to 2030. The NPPF, paragraph 157, indicates that plans should be drawn up over an appropriate timescale with a preference for 15 years. The most recent Local Development Scheme (February 2015) identifies an anticipated adoption date for the plan of April 2016. This means that providing there are no slippages within the timescale the plan will have a time horizon of approximately 14 years.
6. The HBF recommends that the Council consider extending the timescale of the plan to ensure a minimum 15 year time horizon can be provided at the time of adoption. It should be recognised that any amendment of the timescale will require commensurate amendments to the overall housing requirement and need for allocations.

## Duty to Co-operate

7. There is insufficient evidence to indicate that the Council has fully discharged its requirements under the Duty to Cooperate.

8. The Duty to Cooperate (DtC) is not a duty to agree. However, the duty requires more than consultation and meetings. It is the efficacy of the engagement throughout the plan making process and the outcomes which flow from such engagement which determine whether the duty has been met. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (PPG). The PPG states;

*‘it is unlikely that this (the duty) can be satisfied by consultation alone’ and that ‘inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others’.*

9. In this regard the HBF notes the Council's background paper *Duty to Cooperate Statement, February 2015*. This paper identifies that a wide range of discussions and meetings have been held with statutory bodies and this has led to a number of outcomes. In relation to strategic housing issues it is noted that all neighbouring authorities intend to meet their own development needs within their boundaries (paragraph 2.7). The statement further suggests there are no cross boundary issues in relation to housing supply (paragraph 2.15).

10. Paragraph 7.1 of the DtC statement correctly identifies that Local Enterprise Partnerships (LEPs) are not subject to the requirements of the duty but the NPPF and PPG are clear that local authorities should co-operate with these bodies. The document then in appendix 2 indicates how the draft plan supports the LEP Strategic Economic Plan (SEP). It is in this regard that the HBF considers there are failings in the duty.

11. The six Cumbrian authorities of Carlisle, Allerdale, Barrow, Copeland, South Lakeland and Eden are all partners within the LEP and as such had overview of the SEP. The SEP sets out ambitious target to provide 30,000 new homes between 2014 and 2024, to be delivered through local plans. The following table sets out the adopted, or most recently published, housing requirements for each of the districts. This shows the maximum planned capacity within Cumbria over the period 2014 to 2024.

Local Authority	Housing targets 2014 to 2024
Carlisle	5,650
Allerdale	3,040
Barrow	1,800
Copeland	3,000*
South Lakeland	4,000
Eden	2,000
<b>Total</b>	<b>19,490</b>

\*based upon the maximum growth provision within the plan

12. The SEP growth is undoubtedly ambitious, but it is clear that local plans are significantly short of achieving the suggested housing growth identified within the SEP. Whilst the HBF is not suggesting that Carlisle should meet all of this shortfall it remains unclear how the SEP target has influenced the plan and what if any agreements have been made in relation to the housing targets set out within the SEP.

## **Vision**

13. The vision is considered sound. It provides a positive planning framework which encourages economic and housing growth whilst maintaining the rich landscape and heritage of the area. The HBF particularly welcomes the following section of the vision;

*‘...Key to Carlisle’s ongoing success has been an increased supply of new high quality market and affordable homes, the delivery of which has been instrumental in attracting and retaining an economically active workforce and in supporting thriving rural communities...’*

The following strategic objectives are also welcomed;

- *To promote a sustainable pattern of development, which will contribute to building a strong, responsive and competitive economy, to support the vision for managed growth.*
- *To support strong, vibrant and healthy communities, by meeting the housing needs of present and future generations, in a high quality environment with accessible local services.*
- *Foster the right conditions to stimulate inward investment through increasing the working age population; strengthening and expanding the skills base available, diversifying the economy and improving enabling physical infrastructure.*
- *To enable the development of a range of high quality, energy efficient housing, in a variety of appropriate locations, to meet the aspirations of the existing residents, including those with a need for affordable housing and those wishing to move to the area.*
- *To make land available to boost significantly the supply of housing to support economic growth, whilst ensuring new housing supports the creation of thriving communities.*

14. Unfortunately it is considered that these positive statements are diluted by plan policies. These issues are discussed in greater detail against the relevant policies below.

## **Policy SP 2 - Strategic Growth and Distribution**

15. The policy is considered unsound, the housing requirement is not fully justified, consistent with national policy or positively prepared.
16. The HBF has a number of comments upon different aspects of Policy SP2, these are set out separately below.

## **Part 1: Housing requirement**

17. The policy identifies a housing requirement of 565 dwellings per annum (dpa) or 8,475 over the plan period (2015 to 2030). This is a significant reduction of 100dpa over the previous Stage 2 Preferred Options consultation (spring 2014). The HBF consider that the scale of this reduction will have a significant impact upon meeting the economic aspirations of the sub-region and the affordable housing needs of Carlisle.
18. In determining its housing requirement the Council has commissioned JG Consulting. The methodology employed to identify the objectively assessed housing needs of the area is considered to generally accord with the PPG. The September 2014 report, *Strategic Housing Market Assessment* (2014 SHMA), identifies a number of different scenarios which produce a housing requirement range of 480 to 565dpa. It is noted that the report highlights that the lower figure is based on a demographic projection which takes account of longer-term trends and the higher figure being appropriate to meet the job growth forecasts by Experian (paragraph 3.53). The Council identify that the jobs-led forecast (565dpa) to be their objectively assessed housing need. Whilst not an exact science the HBF is generally supportive of aligning job growth and housing needs. This approach is considered consistent with the NPPF (paragraph 158) and PPG (ID 2a-018-20140306). Whilst the HBF agree with significant elements of the 2014 SHMA and the derivation of the housing requirement, we do have a number of concerns which are highlighted within the following sections.

### **SHMA time period**

19. The 2014 SHMA provides a housing requirement over the period 2013 to 2030. This does not correspond with the plan period or policy SP2 which identifies the plan housing requirement is provided over the period 2015 to 2030. This is two years shorter than the SHMA assessment of objectively assessed needs. It is unclear why the Council has not sought to align its housing requirement with the outcome of the 2014 SHMA. The effect is that the housing needs of the area will not be fully met. The plan is therefore planning for two years or 1,130 dwellings, minus any completions, less than the objectively assessed needs of the area.
20. The Council's *Five Year Housing Land Supply: Position Statement (2014)* identifies 190 net dwelling completions were achieved in 2013/14, this is 375 dwellings short of the 2014 SHMA assessment of housing need. The figures for 2014/15 were not available at the time of writing, however it is anticipated that a further shortfall will have been accrued.
21. The HBF recommends that given the 2014 SHMA is seeking to identify housing needs over the period 2013 to 2030, the plan should either be set over the same period or the housing requirement within the plan adjusted to take account of the shortfalls accrued since 2013.

### **Demographic data**

22. Following the publication of the 2014 SHMA the 2012 based sub-national household projections (2012 SNHP) were released. The PPG, as amended,

is clear that these represent the most up to date estimate of future household growth and as such should be used as the starting point for determining household growth (ID 2a-016-20150227). Over the full projection period (2012 to 2037) an annual growth of 195dpa is identified for Carlisle. If the plan period is considered (2015 to 2030) annual growth rates are expected to be higher at 211dpa.

23. The 2012 SNHP compare to a projection of 234dpa in the 2011 interim SNHP (2011 to 2021) and 472dpa from the 2008 based SNHP (*What Homes Where website*). In determining whether the 2012 based SNHP are appropriate it must be considered that these have been influenced by a period of deep recession. It is widely acknowledged that the effect of the recession is a propensity towards lower household growth. Therefore as the economy continues to improve it is likely that household formation rates will also increase. It is therefore likely that the current household projections could suppress the actual future rate of household growth. In this regard the HBF consider the 2012 SNHP should be considered as an absolute minimum starting point.
24. Commenting upon the 2011 interim SNHP and the subsequent 2012 based population projections (SNPP) the 2014 SHMA notes that net in-migration over the last 5 years was significantly lower than the 10 year average (-125 compared to 342 people per annum). This is likely, at least in part, to be due to the lack of housing delivery within Carlisle over the last five years (paragraph 3.12). The 2014 SHMA also considers the age profile of Carlisle is such that there will be a lower level of labour supply. Indeed paragraph 3.13 suggests;

*‘...it is worth noting at this stage that the analysis linked to the 2012-based SNPP suggests that between 2013 and 2030 the number of people in employment would be expected to drop by about 830. Hence planning on the basis of the 2012-based SNPP could not be described as particularly positive within the context of the NPPF and its core principle to positively embrace growth’.*

25. The HBF supports this statement, and suggests that these factors will also inevitably have influenced the 2012 SNHP. Therefore an uplift is required to ensure that the plan does not continue the recent trends of under-delivery and supports economic growth. The 2014 SHMA considers a need to uplift the requirement based upon the recent migratory trends, creating a need for 370dpa. A further uplift is applied to account for the suppression of household formation rates, as discussed above, to provide a baseline demographic scenario of 481dpa 2013 to 2030.

### **Economic growth**

26. Carlisle has a significant economic role to play both within Cumbria and the wider region. This is recognised by the Council and the LEP, who both aspire to improve the economic performance of the area and increase job growth. Given the need to align economic and housing strategies, as discussed above, the HBF agree that the economic led scenario should form the basis

of the housing requirement. The age profile of Carlisle is such that to increase jobs growth will require in-migration of younger age groups and as such will increase the overall housing requirement. The chosen housing requirement of 565dpa is based upon a jobs led scenario which accords with the projections of the February 2014 Experian Forecast. It is noted that this scenario would provide sufficient housing to accommodate approximately 6,350 jobs over the period 2013 to 2030.

27. Whilst the HBF supports the Council in aspiring for job growth the level proposed does not appear to accord with the ambitions of the 2014 Strategic Economic Plan (SEP) of the LEP, which as noted earlier Carlisle is a constituent member. The SEP identifies a jobs growth target of 15,000 jobs between 2014 and 2024, this is equivalent to 1,500 jobs per annum. The 2014 SHMA housing requirement by comparison only provides for jobs growth of just 374dpa, or approximately 25% of that identified within the SEP.
28. The HBF recognise that the SEP jobs growth requirement is for the whole of Cumbria and not just Carlisle. The SEP is also unclear how the 15,000 jobs are proposed to be split amongst the relevant districts. However, given the relative importance of Carlisle within the wider sub-region the HBF would anticipate a higher proportion of jobs growth would be directed to the Carlisle area. The HBF recommends this relationship of jobs growth within the SEP and apportionment to Carlisle be clarified and if required an uplift in the housing requirement be provided to take account of the economic aspirations of the SEP. In addition, as discussed in our comments upon the DtC, the housing ambitions of the SEP also will not be realised.

### **Market Signals**

29. The 2014 SHMA discusses market signals in chapter 2. This is a fundamental element of determining the objectively assessed need for housing (NPPG ID 2a-019-20140306) and a worsening trend in any of these indicators will require upward adjustment to planned housing numbers (NPPG ID 2a-020-20140306). The HBF concurs with the SHMA that many of the market signals identified within the NPPG are not of a sufficient scale to identify the need for a further uplift of the housing requirement. The exceptions, in our view, are overcrowding, backlog against delivery and affordability.
30. In terms of overcrowding it is noted that Carlisle is better than the North West and England averages but it is the worst performing authority within Cumbria. In this regard the HBF recommends the Council seek to address this issue through an increase in the housing requirement.
31. In the period 2003 and 2012/13 the Council accrued a backlog of 827 dwellings against previous targets. The HBF considers that this backlog will have had a material impact upon the housing requirement over a significant period of time, not only upon past migratory trends but will also be reflected in the projections going forward. The HBF does, however, consider that the approach taken to the demographic elements of the plan, as discussed above, will have accounted for the majority of this backlog.

32. The affordability aspect of market signals within the SHMA only considers the ratio of income to price. There is little discussion upon what housing target is required to meet the annual shortfall in affordable homes within Carlisle. This is an essential part of the NPPF. Stating that local authorities should ensure that;

*‘...their Local Plan meets the full, objectively assessed needs for **market and affordable housing** in the housing market area,...’*  
(paragraph 47, our emphasis)

33. The 2014 SHMA clearly indicates a need for affordable homes identifying a net requirement for 295 affordable homes per annum over the period 2013 to 2030. This represents almost 52% of the overall housing requirement (565dpa), this is clearly unlikely to be feasible due to economic viability implications.

34. The 2013-14 Annual Monitoring Report identifies affordable housing delivery during the period 2008/9 to 2013/14 of 438 affordable dwellings or just 73 per annum. This is significantly below the overall requirement. In such cases the NPPG advises;

*‘An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes’.* (ID 2a-029-20140306)

35. The HBF therefore considers that an uplift in the proposed housing requirement can be justified by the identified need for affordable housing.

### **Conclusion**

36. The HBF consider that the proposed housing requirement is too low and a moderate uplift is recommended. In determining the level of uplift required the Council should have regard to the issues raised above particularly in relation to market signals and the need to align the plan with the employment strategy within the SEP.

### **Part 1: Location of housing growth & Policy SP3**

37. Policy SP2 identifies 70% of the housing requirement will be located in the urban area of Carlisle, whilst 30% will be in the rural area. Whilst the HBF understands and supports the need to locate development within sustainable locations and does not wish to comment upon the acceptability or otherwise of individual sites the issue of delivery is a key component of the plan. The 2014 *Local Plan Viability Study* identifies that the urban areas of Carlisle suffer from the greatest viability challenges, and as such the 70% requirement may be difficult to achieve whilst also maintaining a five year supply.

38. The issue is further complicated by the strategic allocation in South Carlisle only identified to deliver dwellings post 2025. Policy SP3 places significant restrictions upon delivery within this area until the production of a secondary

development plan, anticipated for adoption December 2017. This effectively restricts the area available to deliver 70% of the housing requirement. Given the recent history of under-delivery and the economic viability issues inherent within parts of urban Carlisle the HBF recommend greater flexibility be built into the plan to ensure the housing requirement will be delivered in full. Such flexibility could include criteria to bring forward sites within the strategic location earlier than anticipated or to provide contingency sites within other areas which could be brought forward subject to certain criteria such as the lack of a five year supply or allocations delivering slower than anticipated within the trajectory.

#### **Part 6: Previously developed land**

39. The HBF supports part 6 of the policy which seeks to encourage the re-use of previously developed land. This is considered consistent with the NPPF (paragraph 111). The PPG (ID 10-25-20140306) indicates that such encouragement could take the form of incentives or reduced obligations for development upon such sites. The Council may wish to consider how it can incentivise such land being brought forward.

#### **Table 1: Housing land supply**

40. Table 1 identifies the various components of supply and identifies a total supply of 10,485 units. Whilst the HBF supports the identification of a supply which is greater than the proposed housing requirement, as this provides flexibility within the plan, a number of the components are questioned. These are discussed below;

#### **Outstanding planning permissions**

41. The table identifies a total of 4,063 outstanding planning permissions, which were apparent as of the 1<sup>st</sup> October 2014 (*Five Year Housing Land Supply: Position Statement, 2014*). This figure includes all extant planning permissions plus 81 units which were still awaiting the signing of section 106 agreements. Whilst footnote 11 to NPPF paragraph 47 is noted, it is unlikely that all of the planning permissions within Carlisle are likely to be developed. This is due to a number of reasons, such as speculative applications, site valuations etc. The HBF therefore consider that a more robust calculation would be to apply a discount to the sites with planning permission or awaiting Section 106 sign-off. Ideally this should be based upon previous rates of unimplemented permissions. Without such information a common approach used elsewhere and accepted at a number of planning appeals is to provide a 10% deduction in unimplemented housing permissions to take into account that some commitments may not come forward (see appeals at Rothley APP/X2410/A/13/2196928 & Honeybourne APP/H1840/A/12/2171339).

#### **Windfall allowance**

42. The plan anticipates a significant contribution from windfall sites, accounting for 1,500 dwellings over the plan period. The NPPF, paragraph 48, and PPG (ID: 3-24-20140306) do enable local authorities to include such a provision providing there is robust evidence that this will continue to be a reliable source. It is noted that the Council's *Five Year Housing Land Supply: Position Statement (2014)* identifies an average of 176dpa from such



sources between 2008/9 and 2013/14. Whilst it is recognised that the windfall allowance within the plan is lower than this average. The HBF point out that the level of windfalls achieved in the past were in the context of an aging plan and the lack of a detailed SHLAA. The HBF is unaware of evidence to suggest that this rate can be maintained.

43. It is noted that the combined total of windfalls and planning permissions accounts for nearly 66% of the overall plan requirement. This is considered to be unrealistic and may jeopardise the delivery of the plan. It is also likely to impact upon the demonstration of a five year supply of housing land. The HBF therefore recommends that a cautious approach is adopted to the use of a windfall allowance and planning permissions. This will require further allocations to be provided through the plan to ensure that the overall housing requirement can be delivered.

### **Strategic allocation**

44. The plan proposes a strategic allocation for 1,450 units at Carlisle South which is anticipated to deliver from 2025 onwards (Policy SP3). It is extremely unlikely that the majority of this strategic allocation will deliver before the end of the plan period. The trajectory (figure 1) indicates delivery of approximately 300 dpa from the strategic allocation for the last four years of the plan period. This is considered overly optimistic and needs to be justified.

### **Conclusion**

45. Whilst the HBF supports the flexibility of the housing provision indicated in table 1 in reality it is likely to be significantly less. Given the recent history of under-delivery within Carlisle and the need to demonstrate a five year land supply it is important the Council provides sufficient variety and flexibility of allocations within the plan to ensure it achieves a five year supply of housing land.

### **Policy SP 3 - Broad Location for Growth: Carlisle South**

46. The policy is considered unsound as it will not be effective.
47. The policy is considered to lack sufficient flexibility to enable sites within South Carlisle to come forward in advance of the masterplan and subsequent DPD. Given the focus of development within Carlisle (70%) it is important that this area can deliver as early as possible. I also refer the Council to our comments upon Policy SP2 headed 'Part 1: Location of housing growth & Policy SP3' which are considered equally relevant to this policy.

### **Policy HO 1 - Housing Strategy and Delivery**

48. The policy is considered unsound as it is unjustified and may hinder the delivery of the housing requirement.
49. In accordance with our comments upon policy SP2 above, the HBF consider the housing requirement and quantity of allocations to be insufficient.

50. Part 1 of the policy notes that;

*‘Any unallocated sites which come forward for development and which would prejudice the delivery of this strategy will be resisted’*

This is an inflexible statement which pays no regard to the potential sustainability of the proposal nor the fact that the Council is dependent upon a significant quantity of windfalls to make up its housing requirement. The HBF therefore recommend this final sentence be deleted and unallocated sites simply be considered based upon their merits and the requirements of other plan policies.

51. The HBF support the final paragraph of the policy which states that;

*‘Housing delivery will be monitored closely and if the number of houses built is not as expected, interventions will be sought, including bringing forward additional allocations’.*

52. The HBF has already raised concerns regarding the lack of allocations and suggests that more are required to meet the proposed housing requirement over the plan period. In support of the above paragraph it is considered that a more pragmatic approach would be to provide contingency sites, which could be released if certain criteria were met, such as lower than anticipated completions or the lack of a five year land supply. In addition such contingency sites could also be brought forward if housing delivery was greater than anticipated. This would provide additional flexibility not only to deal with under-delivery but also higher than anticipated economic growth.

53. The HBF support the identification of timing of the allocations within the table as being indicative only.

## **Policy HO 4 - Affordable Housing**

54. The policy is considered unsound as it is unjustified and will not assist the delivery of the plan.

55. The HBF support the provision of affordable housing and note the identified need for 295 affordable dpa outlined within the 2014 SHMA. The policy seeks to meet this need through a geographically variable affordable housing target of 20% and 30% and two thresholds of 6 units or more and 11 units or more. Each of these issues are discussed in greater detail below.

### **Target**

56. The HBF is broadly supportive of a variable affordable housing target which responds to the differing economic circumstances across the district. The targets are however considered unjustified and may be prohibitive to ensuring that the plan can deliver its housing needs.

57. The 30% requirement applies to ‘Zone A’ and ‘Zone C’ which effectively covers the rural areas of the district including the town of Brampton. This

area accords with zones 3 and 4 of the *2014 Local Plan Viability Study* (2014 LPVS). The study suggests that these zones are able to sustain a 30% affordable housing contribution in conjunction with other policy considerations. The 20% requirement relates more closely with zones 1 and 2 within the 2014 LPVS. Zone 1 in particular indicates significant viability issues and it is therefore questionable whether such a target can be sustained in this location (Table 10.2, 2014 LPVS). Zone 1 roughly equates to the existing Carlisle built-up area. Whilst it is recognised that the majority of the allocations do not fall within zone 1, the plan still anticipates a significant proportion of delivery from Carlisle (70%), zone 1 includes (at least in part) the South Carlisle growth area, and is likely to be a significant source of windfall development, which account for over 17.5% of the overall plan requirement.

58. The HBF also queries a number of the assumptions made within the 2014 LPVS and as such the conclusions upon viability across the plan area. In terms of land values the 2014 LPVS assumes, in many cases, significantly lower values than identified in the January 2013 *Carlisle Affordable Housing Economic Viability Assessment* (AHEVA) undertaken by Peter Brett Associates. The table below demonstrates the differences.

#### Assumed Land Value Comparison

LPVS £/ha		AHEVA £/ha	
Carlisle	300,000	Zone 1	400,000
		Zone 2	750,000
Elsewhere	1,000,000	Zone 3	1,000,000
		Zone 4	1,500,000

Source: Table 6.3 2014 LPVS (HDH Planning); table 4.10 2013 AHEVA (Peter Brett Associates)

59. Whilst it is difficult to easily compare the different areas between the two studies it appears that zone 1 and parts of zone 2 are equivalent to Carlisle. Whereas the remainder of zone 2 as well as zones 3 and 4 best describe 'Elsewhere'. As illustrated the 2014 LPVS significantly reduces land values which will have a significant impact upon viability. It is unclear why there are such discrepancies between the two studies or why the 2014 LPVS departs from the four zones, widely used elsewhere in the study, in terms of land values.

60. Paragraph 7.5 of the 2014 LPVS identifies that a 2% uplift on current BCIS values has been assumed to account for the increased costs of building to zero carbon standards. This assumption appears low. The Zero Carbon Hub published a report into the *Cost Analysis of Meeting the Zero Carbon Standard* (February 2014). This report suggested additional costs of between £6,700 to £7,500 for a detached house (118sqm) and £3,700 to £4,700 for a semi-detached house (76sqm). Utilising the BCIS costs presented within table 7.1 of the 2014 LPVS the results of the uplift, using the mid-point between the quoted values, are shown below;

### **Uplift upon BCIS based upon zero carbon hub work**

<b>House type</b>	<b>Size (sqm)*</b>	<b>Build costs per sqm+</b>	<b>Overall Build costs+</b>	<b>Zero Carbon costs*</b>	<b>% uplift for zero carbon</b>
Detached	118	£818.00	£96,524.00	£7,100	7.3%
Semi-detached	76	£782.00	£59,432.00	£4,200	7.1%

\* Sizes and costs (mid-point utilised) from Zero Carbon Hub publication

+ Build costs from 2014 LPVS

61. The table clearly illustrates that the Council's assumptions are likely to significantly under-estimate the additional costs associated with the Government's push towards zero carbon. Therefore viability is likely to be more compromised than suggested by the study.

62. Finally the assumption within paragraph 7.29 of the 2014 LPVS suggests that £2,000 per unit for section 106 and CIL is applicable. This again appears low, it is noted that paragraph 7.30 of the study identifies some consultees consider £10,000 on large greenfield sites to be more appropriate. The figure of £2,000 is also queried when it is considered that for open space alone the Council currently seeks contributions of £1,880 (2-bed), £2,815 (3-bed) and £3,755 (4-bed) as outlined in paragraph 8.7 of the 2014 LPVS. This appears inconsistent with the assumptions made, particularly as other policy costs need to be included. Table 10.8A clearly identifies that if section 106 / CIL contributions are raised above £10,000 this has a significant impact upon viability.

63. Given the assumptions made within the viability report and the conclusions within zone 1 it is considered that lower affordable housing targets are required within Carlisle to ensure that the majority of sites remain viable.

### **Threshold**

64. The policy sets two thresholds of 11 or more in zones A and C and 6 or more in zone B. The background text within the plan (paragraph 5.26) correctly identifies that the recent amendments to the PPG, following the ministerial statement on 28<sup>th</sup> November 2014, introduces a national threshold for affordable housing of more than 10 units. Within designated rural areas, including national parks, areas of outstanding natural beauty and areas designated by the Secretary of State (under section 157(1)(c) of the Housing Act 1985) as being rural a lower 6 unit threshold can be applied. However contributions from developments of between 6 and 10 units in such areas should be in the form of a commuted sum payable after the completion of units within the development (see PPG ID: 23b-013-20141128 and 23b-019-20141128 for further guidance). The HBF is unclear if all of the area identified within zone B would fulfil these criteria and therefore recommends that the Council provide further evidence to clarify its position with regards the lower threshold.

65. Furthermore the PPG and written Ministerial Statement also provide for vacant building credits. This applies where a vacant building is either brought

back into lawful use or is demolished to be replaced by a new building. In such cases a financial credit equivalent to the existing gross floorspace of relevant vacant buildings should be applied (see PPG ID: 23b-022-20141128 for further details). For example if an 800sqm floorspace building is demolished and the new development has 1000sqm of floorspace, the affordable housing contribution sought should be a fifth of what would normally be sought. Whilst this need not be replicated in the policy it is recommended, for purposes of clarity, reference be included in the explanatory text.

### **Policy CC 3 - Energy Conservation, Efficiency and Resilience**

66. The policy is unsound as it is not consistent with national policy.

67. The policy and supporting text require developers to consider mechanisms to reduce energy efficiency beyond those set within the Building Regulations. The Council will be aware of the recent ministerial statement by Eric Pickles on 25<sup>th</sup> March 2015. The statement clearly explains local planning authorities should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. With regards energy the Housing Standards Review has clearly expressed that a single standard within the Building Regulations is the only approach to energy requirements and as such local plans should not seek to introduce new standards or require developers to surpass such standards.

68. The text also makes reference to the Code for Sustainable Homes. The ministerial statement identifies that the code has now been withdrawn, the Council may therefore wish to amend the text accordingly.

69. Due to the implications of the recent ministerial statement the HBF recommends this policy be deleted.

### **Information**

70. I would like to be made aware of the following;

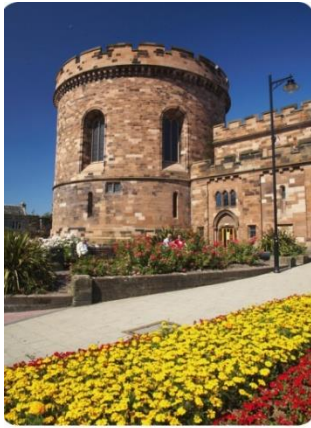
- Submission of the plan for examination;
- The publication of the examiner's recommendations and any publicly available correspondence regarding the plan; and the
- Adoption of the plan.

71. I would be happy to discuss any of the issues raised in this representation further prior to submission of the document.

Yours sincerely,



**Matthew Good**  
**Planning Manager – Local Plans**  
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Tel: 07972774229



# The Carlisle District Local Plan 2015-2030

## Proposed Submission Draft Consultation Representation Form



CARLISLE  
CITY COUNCIL



[www.carlisle.gov.uk](http://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 **20<sup>th</sup> 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](http://www.carlisle.gov.uk/localplan)

### **How to respond –**

**Via email:** [lpc@carlisle.gov.uk](mailto: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.

<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Title: Mr	Title:
Surname:Good	Surname:
Forename:Matthew	Forename:
Organisation/Company:Home Builders Federation	Organisation/Company:
Address:The Styres Cottage, Styres Lane, Sowerby, Sowerby Bridge, West Yorkshire	Address:
Postcode:HX6 1NF	Postcode:
Contact No:07972774229	Contact No:
Email:matthew.good@hbf.co.uk	Email:
Signature: M J Good	
Date:17 <sup>th</sup> April 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.

<b>Q1. To which part of the document does this representation relate?</b>			
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Paragraph	<input type="checkbox"/> Chapter	<input type="checkbox"/> Figure
<b>Please specify which Policy, Paragraph, Chapter or Figure you are referring to:</b>			
See attached report relating to the following issues / policies; Plan Period; Duty to Co-operate; Policy SP2; Policy SP3; Policy HO1; Policy HO4; and Policy CC3			

<b>Q2. Do you consider that the Local Plan is:</b>		
<b>Legally Compliant?</b>		
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<b>Sound?</b>		
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes, with minor changes	<input checked="" type="checkbox"/> No

<b>Q3. If you consider the Local Plan is <u>unsound</u>, is it because it is <u>not</u>:</b>	
<input checked="" type="checkbox"/>	Positively Prepared?
<input checked="" type="checkbox"/>	Justified?
<input checked="" type="checkbox"/>	Effective?
<input checked="" type="checkbox"/>	Consistent with National Policy?

<b>Q4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.</b>
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.</b>
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.
Please see attached report

**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:**

Please see attached report

**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?**

Please see attached report

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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?**

- ☐ 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.**

The HBF wish to outline our concerns in further detail with the inspector. This is necessary to ensure that the inspector has a thorough understanding of the wider housing industry concerns with the plan. Appearance at the examination also ensures that we can supply the inspector with the latest evidence in relation to our comments.

**Thank you for your time to complete and return this Representation form.**

**Please keep a copy for future reference.**

## Fiona Kenmare

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**From:** Jillian Hale  
**Sent:** 27 May 2015 17:12  
**To:** Fiona Kenmare  
**Subject:** Rep No 0167 HBF confirmation of AH Zone 27 May 15

Hi Fiona,

Can you place a copy of this with the original submission, on both the database and hard copy. Many thanks.

Jilly

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**From:** Matthew Good [<mailto:matthew.good@hbf.co.uk>]  
**Sent:** 27 May 2015 16:49  
**To:** Jillian Hale  
**Subject:** Re: Carlisle District Local Plan

Hi Jillian

Thank you for this.

I have just re-read our submission and yes I do appear to have got zones A and B mixed up. Your assumption is therefore correct. I can also confirm that the final sentence of paragraph 64 should refer to zone A rather than B.

Do you need anything more formal from me to confirm this mistake and that your assumptions are correct or will this email exchange suffice.

Kind regards  
Matthew

Matthew Good  
Planning Manager - Local Plans  
HBF

On 27 May 2015, at 16:23, Jillian Hale <[Jillian.Hale@carlisle.gov.uk](mailto:Jillian.Hale@carlisle.gov.uk)> wrote:

Hi Matthew,

I am just looking through the representation sent by you on behalf of the HBF in response to the recent consultation on the proposed submission draft Local Plan. In particular, paragraph 64 of your submission in relation to affordable housing thresholds. Would you be able to check what you are saying about the zones, as it seems to me that you have got zones A and B mixed up. Therefore am I correct in assuming that the first line of this paragraph should read:

*"The policy sets two thresholds of 11 or more in zones B and C, and 6 or more in Zone A".*

Could you also clarify whether the last sentence of this paragraph should therefore refer to Zone A rather than Zone B?

Many thanks.

Jillian

**Jillian Hale MRTPI**  
**Principal Planning Officer (Policy)**  
(Mon-Thurs)

Economic Development  
Carlisle City Council  
Civic Centre  
Carlisle CA3 8QG  
Direct Dial: (01228) 817191  
Email: [jillian.hale@carlisle.gov.uk](mailto:jillian.hale@carlisle.gov.uk)

Carlisle City Council's priorities are the local environment and the local economy

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