



The Carlisle District Local Plan 2015-2030

Proposed Submission Draft Consultation Representation Form



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:	Title: Mr
Surname:	Surname: Miller
Forename:	Forename: David
Organisation/Company: Workman/ Adamski/Hutchinson/Milbourne/Nanson	Organisation/Company: North Associates
Address:	Address: Suite 4, Grindleton Business Centre, The Spinney, Grindleton, Clitheroe, Lancashire
Postcode:	Postcode: BB7 4DH
Contact No:	Contact No: 01200 449707/07971 330063
Email:	Email: davem@north-associates.com
Signature: D. Miller	
Date: 10/04/15	
☒ 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:

Policy SP2 (Strategic Growth and Distribution)

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.

The Inspector will be aware that, inter alia, the Home Builders Federation (HBF) has submitted detailed representations on this and other policies. As an Associate member, we fully support their stance.

The policy identifies a housing requirement of some 565 dpa. This is a significant reduction of 100dpa from the previous iteration of the Plan. This level of reduction will inevitably give rise to a very negative impact upon the delivery of market and affordable homes during the Plan period, which is clearly counter-productive to the Plan's spatial vision and strategic objectives, notwithstanding the NPPF's aim of significantly boosting housing supply (para 47).

Whilst it may be argued that the methodology used in determining the housing requirement is in general accord with Planning Practice Guidance (PPG), there are nonetheless a number of issues to be addressed.

There is a clear anomaly between the timeframes of the Strategic Housing Market Assessment (SHMA) versus the Plan period. The former runs from 2013-2030 and the latter from 2015-2030. The resultant impact is such that housing need will not be fully met on the basis that it is short by two years.

We strongly agree that Carlisle has a significant economic role to play, both as the principal settlement within the district per se and indeed at the macro, Cumbria level.

Whilst we explicitly support the Council in aspiring for jobs growth, we agree with the HBF that the actual level proposed does not accord with the 2014 Strategic Economic Plan (SEP) of the LEP. Given that Carlisle has a central role to play in generating economic activity for the Cumbria region, it is perplexing that the jobs growth target contained within the SHMA is only 25% of that identified in the SEP.

Turning to affordability, the 2014 SHMA identifies a need for affordable homes at a net requirement of 295 dwellings per annum over the period 2013 to 2030. This represents almost 52% of the overall housing requirement (565dpa). We fully concur with the HBF in that this level of provision is unlikely to be feasible due to economic viability implications.

Further, 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. As such, it is imperative to look to address this by increasing housing supply and choice such that the delivery of the requisite number of affordable homes is facilitated. This is reflected in a number of our wider representations to the Plan, which seek additional housing allocations.

Our own examination of the Council's Housing Land Supply Statement dated 1 October 2014 makes it abundantly clear that the assessment scenarios used to calculate supply (table on page 14 of the document) are fundamentally flawed given the combination of the annualised housing targets used; application of 5% versus 20% buffer when persistent under-supply is acknowledged by the Council; and the stubborn resistance to using the widely accepted Sedgefield methodology (Liverpool has been intentionally used) to deal with the spread of backlog. The net impact is that the supply scenarios are, to say the very least, highly questionable and concerning. It is imperative that housing supply looks forward to boosting growth and not at past performance in the context of RSS and pre-NPPF.

In conclusion, therefore, we endorse the HBF position such that the proposed housing supply is set too low and that an uplift is required by positive intervention (i.e. additional housing allocations). There is then the added consideration of the housing market in Carlisle having been, to a marked degree, dominated for some time by one developer, which the Council acknowledges, thus it could be argued that there is also a lack of housing choice. We are aware that the Council is keen to see

a more diverse housing offer in Carlisle and, to this end, we are ourselves working with a number of regional and national house builders on sites that we are promoting through this Plan. These are discussed in our submissions to policy HO1 (Housing Strategy and Delivery).

Finally, it is the case that a number of the draft housing allocations in the Plan (e.g. R5, R10, U4, U5, U10) are subject to current planning applications/planning permissions or resolutions to grant pending the completion of s106 planning obligations. As such, these will become commitments prior to the adoption of the Plan and further support, in our view, a reasonable requirement to provide additional housing provision and choice in the form of further allocations.

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:

We consider that the proposed housing requirement is set too low and that an uplift is required. In determining the level of uplift required the Council should have regard to the issues raised above, particularly in relation to the inherent need to align the Plan with the employment strategy within the SEP and to address its lack of a deliverable 5-year supply using a robust calculation methodology that is consistent with the NPPF in terms of buffer percentage and that addresses backlog in a positive and more reasonable manner.

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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?

No

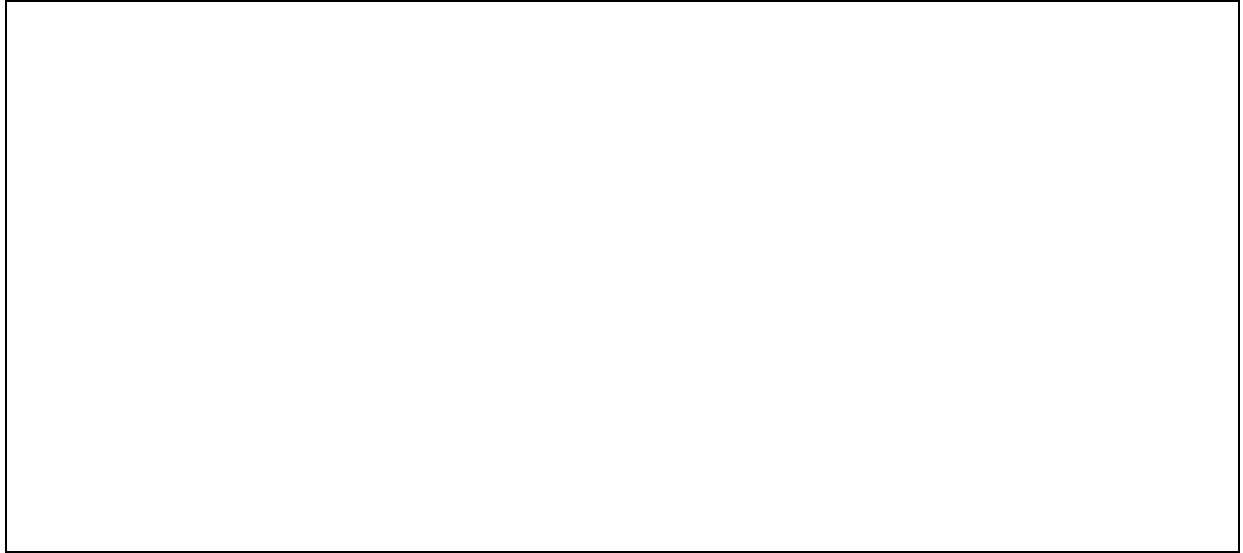
Q7. If your representation is seeking a change; do you consider it necessary to participate in the hearing sessions of the examination?

- ☐ 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.

To be able to participate in the discussion concerning housing supply matters and the extent of allocations versus the reliance on windfall development provided by policy HO2.



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