

Our ref: CARL-01

20 April 2015

Planning Policy,
Carlisle City Council,
Civic Centre,
Carlisle
Cumbria
CA3 8QG

Consultation Response to Carlisle District Local Plan

Dear Sir / Madam,

Persimmon Homes Lancashire are grateful for this opportunity to respond to this consultation. It is important to consider a wide range of stakeholders when preparing a Local Plan that has policy implications on how the region will develop and grow over the next 15 years.

In broad terms, the Spatial Vision as set out is supported. A focus on the assets that Carlisle and the surrounding region have is important in creating a strong Local Plan with policies that can build on these. The Strategic Objectives that will help fulfil the vision focus on creating vibrant communities through meeting the housing needs that are prevalent now. A focus on the development of high quality and sustainable dwellings that meet a variety of identified need is important and Persimmon Homes is supportive of this. Strong policies that will ensure this are important.

The plan period is currently set for 2015 – 2030. It is recommended that the Council considers extending this to allow time for a full examination and adoption which will likely be in 2016. As the NPPF states that plans should be drawn up for the next 15 years, this should be viewed as a minimum and on this basis, the plan period is amended to reflect this.

A Duty to Cooperate statement was produced in February 2015, which outlines the steps the Council has taken to ensure that there has been an appropriate consultation with the relevant bodies. Although not a duty to agree, to ensure a sound plan that is deliverable, cooperation with the neighbouring Local Planning Authorities is highly recommended. This will ensure the right policy environment is created to allow each sub-region to prosper with limited conflicts. It is generally accepted that there are not any cross-boundary issues between the authorities currently and this is reflected in the Duty to Cooperate statement. It is recommended however

that the authorities work closely to ensure that the housing requirement for Cumbria as a whole is met.

Policy SP 1 is encouraging and aligns with national planning policy. The focus on ensuring sustainable development is approved without delay is essential to facilitating growth in the region.

It is noted that the annual housing requirement as outlined in SP 2 is lower than in the previous versions of the draft Local Plan document, where 665 dwellings per annum was considered. This reduction may have an impact on being able to meet to the overall housing need and targets in the Strategic Economic Plan (agreed through the Cumbria LEP). Although any shortfall on the target set out in this plan should not fall on the district of Carlisle; however as one of the largest and most accessible urban areas in Cumbria, a focus on housing here would be the most sustainable.

The focus on growing the urban area is encouraged, and to meet this there needs to be sufficient land identified to accommodate this. This may include identifying sites in Carlisle South pre-2025, and therefore this option should be included in the policy (SP 3) to allow for plan flexibility. It is also encouraged that this area is planned and fully examined as a Development Plan Document as soon as possible. Sites in Carlisle South may be deemed more viable than the proposed allocated sites, and therefore the delivery of housing needs to be flexible to ensure a continual new housing supply to meet demand.

There are initial concerns regarding the delivery of housing in the borough. The delivery of 565 homes per annum is an optimistic target, being at the top end of the SHMA suggested range; however it is achievable if the right policy environment is adopted. This will align the housing and jobs growth, and ensure one aspect of the plan does not hold back the other. The delivery of the strategic allocation in Carlisle South will be 1,450 dwellings (as demonstrated in Table 1). As this policy appears to be wholly responsible for delivery of units post-2025 alongside speculative windfall development, there needs to be greater consideration as to how the new deficit will be met¹ in the latter stages of the plan period.

Policy HO 2 is acceptable in principle however Persimmon Homes have some reservations to how much of the delivery of housing is anticipated from these sites. We would therefore ask the Council to reconsider this amount. Further, it is considered that as windfall sites are necessary

¹ It is not clear how the required number of units will be met post-2025. The allocated sites in policy HO 1 indicate delivery between years 0 and 10, and only Carlisle South strategic allocation caters for completions post-2025. At a predicted 1,450 units, this equates to 290 units per year. Although it may be expected that some 'spill over' of sites from years 6 – 10 might occur, this cannot be certain and should not be relied upon. Therefore, a greater consideration needs to be given to how the requisite amount of housing set out in policy SP 2 is met.

to meet the housing requirement, it is therefore recommended that this policy is amended to emphasise that these sites supplement the site allocations and will not prejudice their delivery.

The delivery of affordable housing has been low between 2008 and 2014 (a net completion of 73 units). On this basis, it may be appropriate to revise the proposed housing requirement and uplift it to facilitate greater affordable housing delivery secured by policy HO 4. Further, while it is encouraging to see a variable affordable housing policy implemented based on the viability of these zones, the tenure of these units should not be wholly dictated by policy. It is recommended that the word 'financial' is removed from this paragraph as there could be other reasons as to why affordable housing may not be fully deliverable (e.g. limited RSL interest). For clarity, it is recommended that a high quality copy of figure 2 is distributed to ensure that the delineation of each zone is clear, especially within the urban area.

Any reference to Code for Sustainable Homes within policy CC 3 and the supporting text should be removed to ensure there is not any confusion. Further, it is recommended that there are not any further technical standards relating to dwelling size, internal layout and energy performance included in any policies. With the recent consultation on Housing Standards Review now completed, it is clear that a single standard implemented through Building Regulations is the most appropriate approach and therefore Local Plans should not seek to introduce any further standards.

Site Specific Representations

U 5 – Land between Carleton Road and Cumwhinton Road

The application is under consideration by Carlisle City Council and aligns with current and emerging plan policy. Please see planning application ref: 13/0983 for further details. The number of units proposed needs to be amended to reflect the current planning application (189).

This site will deliver a strong urban boundary and interaction with the surrounding countryside. The mix reflects the need in the area and includes houses and bungalows. The delivery of this site is within 0 – 5 years, as specified in the policy.

U 10 – Land off Windsor Way

The application is under consideration by Carlisle City Council and aligns with current and emerging plan policy. Please see planning application ref: 14/0778 for further details. The number of units put forward here needs to be amended to reflect the current planning application (275).

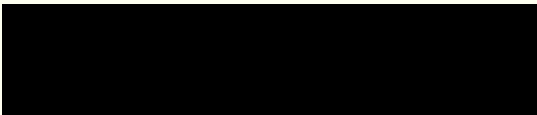
This site will deliver a strong urban boundary and it is suggested that the proposals map is amended with the settlement boundary drawn to safeguard the surrounding land to ensure the historic and natural environment is preserved and to avoid unnecessary encroachment as

delivery is focused on south Carlisle. The delivery of this site is within 0 – 5 years, as specified in the policy.

Persimmon Homes believe that this plan, with some adjustments and further clarity would be found sound and compliant. It is recommended that the consultation responses are considered as quickly as possible and an examination set for this year to ensure the plan is adopted promptly to avoid any policy vacuums.

Please keep me informed on the Local Plan progress, including information regarding an Examination in Public in which we would like to attend. If you wish to discuss any of the points raised above, please do not hesitate to contact me on the attached details.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Chris Gowlett
Persimmon Homes Lancashire