

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

16/05/2016

Dear Sir / Madam

Carlisle District Local Plan: Proposed Main Modifications Consultation

Thank you for consulting the Home Builders Federation (HBF) on the proposed Main Modifications to the Carlisle District Local Plan.

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.

The HBF would like to submit the following comments upon the main modifications, these comments should be read in conjunction with our previous submissions upon the plan and examination hearing statements. It should be noted that the HBF still has a number of outstanding issues from our previous comments which remain unaddressed.

Modification number MM01 (Page 34, Policy / Para: SP2)

The proposed modification is considered unsound as it is not justified nor positively prepared.

The HBF supports the amended base date of 2013 and subsequent change to the overall housing requirement, these amendments ensure that the plan and its evidence base utilise a consistent base date. The HBF does, however, still consider that the overall housing requirement should be higher. This is addressed within our comments upon the submitted plan and hearing statements.

Our key area of concern with the modification is the proposed phasing of the housing requirement. Whilst it is recognised that each phase is indicated as a minimum the move away from an average annual requirement of 565dpa to a stepped requirement of 478dpa between 2013 and 2020 and 626dpa between 2020 and 2030 is not considered positively prepared and may suppress housing completions early in the plan period whilst creating delivery pressures post 2020. The HBF address our key concerns with the staged approach within our Matter 1 hearing statement (Examination ref: EL2.007b). These comments are already before the Council and Inspector and therefore are not repeated here.

It is, however, worth noting that the Inspector of the Cheshire East Local Plan Strategy noted that when faced with a similar policy that a phasing of the housing requirement was not justified (*Paragraphs 62 and 63, Inspector's Interim Views, 12th November 2014, Cheshire East Local Plan Strategy*). In this case the Council had argued, similar to Carlisle, that the housing market may take time to adjust following the recession and relevant levels of delivery had not occurred early in the plan period. It is notable that

the amended plan, which is still undergoing examination, now has an average delivery rate across the whole plan period.

Modification number MM02 (Page 34, Policy / Para: SP2)

The amendments are considered to provide greater flexibility and clarity and as such are supported.

Modification number MM03 (Page 35/36, Policy / Para: 3.8-3.10)

Notwithstanding our comments regarding the overall housing requirement the HBF support the increase in the overall housing requirement from 8,475 to 9,606 to ensure it aligns with the base date of the evidence. These modifications are consistent with our comments upon the submitted version of the plan and Matter 2 examination hearing statement (Examination ref: EL2.007b).

Modification number MM04 (Page 36, Policy / Para: Additional after 3.10)

The proposed modification is considered unsound as it is not justified nor positively prepared.

In common with our comments provided against MM01, above, the HBF does not agree with the principle of a stepped approach. Our reasoning is clearly set out within our Matter 2 hearing statement (Examination ref: EL2.007b).

The second paragraph is considered to provide more positive wording. This does not, however, overcome our fundamental concerns with the stepped approach.

Modification number MM05 (Page 36, Policy / Para: 3.11)

The proposed amendment is supported as it is considered to provide additional clarity and flexibility. This accords with our previous comments upon this issue.

Modification number MM06 (Page 36, Policy / Para: 3.12)

The proposed amendment is considered to provide additional clarity and as such is generally supported. The removal of the arbitrary date of 2025 for Carlisle South aligns with our previous comments upon this issue.

Modification number MM09, MM10, MM11 (Page 43, Policy / Para: SP3)

The proposed modification is considered unsound as it is not effective or positively prepared.

The amendments are considered an improvement to the original policy text and remove the arbitrary date of 2025. The development of the area does, however, remain constrained by the adoption of the subsequent Development Plan Document. This may stall appropriate development from coming forward prior to the formal adoption of the DPD. This is a significant issue for the plan because without significant development in Carlisle South the plan may not meet its overall housing requirement. This is clear when considering the trajectory.

In this regard, and to provide further flexibility for appropriate development, the following amendments are suggested (red). These amendments remove reference to the release and phasing being strictly controlled by the adoption of the DPD but should enable the Council to ensure that development is still in accordance with the emerging DPD.

Paragraph 1: 'A broad location for growth for a **major** mixed use ~~urban extension~~ **development**, focusing on housing, is identified on the Key Diagram at Carlisle South. ~~The urban extension is expected to be delivered from 2025 onwards.~~ **The**

development of Carlisle South will be informed by a Development Plan Document inclusive of an infrastructure delivery strategy.'

Paragraph 3: **"To enable a comprehensive and co-ordinated development approach, Piecemeal or unplanned** development proposals within the area which are likely to prejudice its delivery including the ~~large scale~~ infrastructure required for the area will not be permitted. **Development brought forward prior to the adoption of the DPD will be required to demonstrate how the scheme compliments the development of the wider Carlisle South area.**

Modification number MM12 (Page 44, Policy / Para: 3.31)

The proposed amendment is supported.

Modification number MM15 (Page 45, Policy / Para: 3.37)

The proposed modification is considered unsound as it is not justified nor effective.

Whilst the proposed modification is considered an improvement upon the reference to '10 years' it remains unclear why appropriate development, which compliments the overall development of Carlisle South, cannot be brought forward prior to the adoption of the DPD. The Council can legitimately place weight upon applications which conform to both this current plan as well as an emerging DPD for the area.

Our concerns regarding waiting until adoption of a Carlisle South DPD are that the proposed trajectory requires development to be contributing 250dpa by 2025 at the latest, see appendix one to the schedule of modifications. This is likely to require a number of development outlets operating at the same time. The lead-in time to some of those sites including the application process, discharge of pre-commencement conditions, ground preparations and commencement of development is likely to take a number of years. If for any reason the progress of the DPD slips this may not allow sufficient time for such preparatory work to be undertaken. This will inevitably place the delivery of the housing requirements within the plan in jeopardy.

To provide certainty that development will occur as required it is recommended that a more flexible approach be taken which allows applications to be submitted prior to the formal adoption of the DPD.

To overcome this issue, alongside our other recommendations in relation to Carlisle South, the HBF recommends paragraph 3.37 simply be deleted.

Modification number MM21 (Page 62, Policy / Para: SP9)

The HBF supports the deletion of the reference to Lifetime Homes. Following the Governments Housing Standards Review this standard is no longer relevant.

Modification number MM22 (Page 64, Policy / Para: 3.85)

The HBF supports the deletion of reference to Lifetime Homes due to the reasons provided upon MM21, above.

Modification number MM31 (Page 96, Policy / Para: HO1)

In common with our other comments upon this issue the proposed amendment is supported.

Modification number MM43 (Page 107, Policy / Para: HO4)

The HBF supports the proposed amendment which recognises the likely changes to the definition of affordable housing and requirement for Starter Homes.

Modification number MM48 (Page 123, Policy / Para: 5.86)

The HBF support the removal of reference to Lifetime Homes which is no longer applicable. This is proposed to be replaced by reference to Building Regulations M4(2) (Accessible and Adaptable Dwellings), and M4(3) (Wheelchair user dwellings). This is the correct interpretation. It is noted that the Council intends to encourage these standards, Policy SP3. This is considered acceptable. It should, however, be noted that the Council cannot require such standards are met without fulfilling the requirements set out with section 56 of the PPG (*Housing - Optional Technical Standards*).

Modification number MM66 (Page 158, Policy / Para: 7.27)

The HBF support the proposed amendments which bring the text into line with national policy.

Information

The HBF would like to be involved in further hearing sessions if considered relevant and necessary.

We would also like to be informed of the following;

- Publication of the inspectors' recommendations
- Adoption of the Local Plan

Yours sincerely,

MJ Good

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