



November 2015

Representor Reference: 089

Representor: Sandra Manson, Signet Planning on behalf of Story Homes Ltd

CARLISLE LOCAL PLAN EXAMINATION**MATTER 2 – HOUSING**

Issue 1: Whether the housing requirement figure of 8,475 dwellings contained in Policy SP2 of LP will meet the objectively assessed housing needs of the area over the plan period.

Q1. Is the methodology for assessing the OAN appropriate and the conclusions supported by the evidence including market signals; if not, why not?

Story Homes have not previously raised issue with the methodology or the objectively assessed need figure of 8,475 dwellings over the plan period reflected in Policy SP2. However, our submission draft representations referred to anomalies relating to the timeframe of the plan so to ensure the plan was for a minimum 15 year period from the time of plan adoption and that the plan was amended to reflect. In this respect it is noted that Proposed Modification MM02 (EL1.006B) seeks to address this position and clarifies that the proposed housing requirement is a net minimum of 9,605 dwellings over the period 2013 – 2030, and is supported by Story Homes.

Issue 2: Whether the spatial strategy is justified?

No comments to raise.

Q2. Is the reliance on some windfall developments to accommodate the growth required until 2025 justified?

The current plan trajectory seeks a high quantum of windfall provision throughout the plan period at 100 units per annum. Whilst Carlisle City Council has previously had high levels of windfall housing delivery, this has been in the context of an out-of-date plan and without the benefit of a more robust approach to identifying housing sites through the Strategic Housing Land Availability Assessment. The authority now has considerable information on land availability to be able to determine site suitability at the plan development stage to enable them to identify sufficient specific deliverable sites.

In this regard, we would anticipate that windfall housing is likely to decrease in the context of this site specific Local Plan being adopted. In this regard, the reliance on an annual windfall supply of 100 units per annum is considered to be overly high and adds fragility to the housing supply informing the plan. It is considered that to remove issues of fragility in the housing supply as detailed in our previous submissions, and in order to meet the housing requirement within the first 10 year period, additional site allocations should be incorporated within Policy H01 specifically:

- Land at Greenhill, Brampton – SHLAA Site BR14;
- Houghton Road – SHLAA Site H002;
- Additional land at Hadrians Camp, Houghton – Part of SHLAA Ref H003; to extend the allocation R10
- Land at Cumwhinton, Petergate – SHLAA Ref CUW04.

The inclusion of such sites will ensure the plan is considered sound by ensuring it is positively planned by building in sufficient flexibility to demonstrate an effective housing land supply to deliver the OAN, as required by paragraph 47 of the NPPF.

We also refer you to the Blackwell site, SHLAA Ref: BL03 discussed in relation to the broad location at Carlisle South.

Further commentary is provided on these sites in relation to Matter 3.

The Council's response on Q3. And Q4. are awaited.

Carlisle South

Q5. The urban extension is expected to be delivered from 2025 onwards. The housing trajectory indicates that Carlisle South is expected to deliver approximately 300 dwellings per annum (dpa) over the last 4 years of the plan period:

- (a) Is there any policies restriction on development within the site coming forward sooner than 2025 as suggested in some representations, provided that any proposals would not prejudice the delivery of the site as a whole including the infrastructure required?**
- (b) Is the housing trajectory realistic, particularly given the large scale infrastructure that is required?**
- (c) How will the infrastructure required be funded and co-ordinated?**
- (d) Are the timescales for the adoption of a further Development Plan Document realistic to ensure that development will commence as expected?**

By way of background, Story Homes retain a number of land interests within the broad location for growth to the south of Carlisle. Planning permission was secured by virtue of planning application reference: 12/0793 for the provision of 318 no. dwellings (including 66 no. affordable dwellings) on land by Hammonds Pond, Carlisle which lies to the south of Carlisle within the indicated broad location and are currently developing the site out.

Story Homes are of the view that the approach to the urban extension at Carlisle South must incorporate suitable flexibility to enable delivery to take place without stymieing the housing delivery required to enable the Authority to meet its objectively assessed needs. Flexibility needs to be incorporated within the policy to enable the step changed delivery required. The Council's phased/stepped submission to the Inspector for increased delivery across the plan period, however we raise significant concerns about the backloading of the housing uplift later in the plan linked with delivery of Carlisle South in the end plan period.

It is essential to create a continuity of market offer, which responds to market signals, to facilitate the step change required. It is considered that Story Homes site at Blackwell (SHLAA Ref: BL03) which lies within the Broad location area – see plan attached, offers an opportunity to be an allocation through housing allocations Policy H01 to enable continuity of supply and delivery following the build out of the currently consented scheme. Story Homes anticipate that the site should come forward within the 6 – 10 years plan period which would then lead into the delivery of the Carlisle South urban extension.

The Council's Statement on the Introduction of a Phased/Stepped Approach to Housing Delivery sets out in Appendix 3 the quantified deliverable supply table. This indicates a very high delivery on the Carlisle South extension as of plan year 2025 – 2026 starting at 250 units in year 2025/2026 with 300 units per annum for the remainder of the plan period. Realistically, it is considered that given the approach to developing a Development Plan Document for the broad location for adoption within the first 5 year period, there is no reasoning as to why delivery would not commence sooner and be on a more realistic annual delivery rate than the Council have currently included. In this respect, it is considered that Policy SP3 should be amended in relation to the timescale for delivery of the broad location

with a view to it being brought forward within plan period 6 – 10 years rolling through to period 15 – 20 years.

Story Homes Blackwell site would align with this delivery approach for the middle plan period, and respond to the need for flexibility in the supply.

In relation to amendments and modifications to Policy SP3, it is also considered there is no justification for an approach that would preclude individual sites within the Broad location coming forward subject to them meeting all necessary site specific requirements and addressing infrastructure elements, in the context of the emerging work being undertaken for the Development Plan Document. Story Homes have had sight of the proposed modifications suggested by the Home Builders Federation (HBF) in their submitted statement and would support their proposed modifications to the policy to address Story Homes concerns.

Issue 3: Whether the Council can demonstrate a 5 year housing land supply.

Q1. The Council's 5 Year Housing Land Supply Position Statement (April 2015) (EB007) sets out the basis upon which the Council consider a buffer of 5% is justified. The Council elaborates on this further in its response of 31st July 2015 (EL1.002C). Does the Council's assessment of delivery justify the application of a 5% buffer?

Story Homes concur with the Inspector's position set out in Examination Document EL1.003A in regard to the approach to applying the 20% buffer on the annualised 5 year requirement plus undersupply in their overall 5 year supply calculations. This would accord with the NPPF paragraph 47 which is clear that where there is a record of persistent under delivery to housing the local planning authority should increase the buffer to 20% to provide a realistic prospect of achieving the land supply and to ensure to choice and competition in the market. This is acknowledged in the Carlisle City Council 5 Year Housing Land Supply Position Statement April 2015 but sets a position that under delivery due to the recession and housing market crash alongside perceived issues relating to the capacity of the industry to meet that housing supply are justification to utilise a 5% buffer. Those factors are not a strong justification to establishing the level of buffer that applies or not. Simply, there has been persistent under delivery and in this regard, we are of a view that 20% buffer should be applied.

Q2. Is the Council's approach justified?

The Council have proposed main modifications to the approach of housing delivery through a stepped approach submitted to the examination by way of Phased Delivery Statement EL1.005E. The phased approach is being aligned to job creation and economic growth setting out that additional housing requirement is solely led by the creation of new employment in the first instance. This is considered to be short sighted, and also not aligned with the need to significantly boost housing supply and address affordable housing requirements including within the first 5 year plan period.

Story Homes as one of the main housebuilder's within Carlisle City Council area is committed to delivering throughout the plan area on all of its allocations, but also on additional sites which are discussed in relation to Matter 3, all of which are to be progressed through the development management system predominantly within the first 5 year period aligned with its business model. This indicates that already there is step change in terms of market delivery by one single housebuilder and it is understood that the City Council are actively developing interests with other volume builders who are expressing a significant interest in Carlisle, which all adds to housing choice and delivery as required by the NPPF. However, to attract such an additional market chain, the plan needs to maintain its positive approach through consistent housing delivery targets throughout the plan period to which the

authority confirm in any event in their statement on a Phased/Stepped Approach to housing delivery in Paragraph 2.13 that:

“Importantly it is not considered necessary to seek to manage delivery to restrict delivery rate in the 2013 to 2020 period. In the event that the industry can mobilise quicker than anticipated and demand is greater than envisage, there appears no evident logic to hold back and constrain supply”.

It therefore seems to be a desk top exercise in altering housing supply requirements to demonstrate a 5 year supply where in actual fact confirmation of additional allocations to expedite delivery of sites, remove reliance upon windfall delivery alongside the positive approach being taken to attract the market to deliver would align with the NPPF in relation to positively preparing the Local Plan, and facilitate achieving the 5 year land supply enabling the plan to be found sound.

Q3. What, if any other alternatives are available to address the 5 year housing land supply without adopting a stepped approach?

See commentary above.

Q4. Is the Council's suggested approach the most reasonable when considered against any reasonable alternatives?

See commentary above.

Q5. Is there a realistic and reasonable likelihood that those sites including the 5 year housing land supply trajectory are deliverable within the 5 year timeframe (assessed from 1st April 2015)?

Story Homes can confirm the trajectory included in the 5 year housing land supply in relation to sites within their control are largely realistic with the exceptions of their site at Crindledyke. Story Homes have been delivering in the region of 35 units per annum from that site which they anticipate will continue to progress on the same basis. The City Council have identified a delivery of 50 units per annum within Appendix 3 Quantified Deliverable Supply tables, with a further uplift of 60 units per annum from years 2022/23 towards the end of the plan period. It is therefore, considered that the trajectory for Crindledyke included in the supply document is overly optimistic and should be amended to reflect a more realistic 35 to 40 units per annum.

We would also refer to our submission draft representations in relation to extant planning permissions and the likelihood and timing of build out where it is considered that a commonly used approach to provide a 10% reduction on unimplemented housing permissions to take account that some commitments may not come forward should be factored into the overall housing supply.

Q6. Are the Council's policies sufficiently flexible to bring alternative sites forward, including Carlisle South, should delivery of sites not come forward as anticipated?

Story Homes have previously supported the windfall housing Policy H02 but with the suggestion that the justification text should clarify that windfall housing can relate to sites that have been discounted through the site selection and SHLAA process and not be allocated within the plan, subject to them complying with all policy tests within H02 and SP1. This would provide clarity to the decision-makers and developer interests and acknowledge that some of the discounted sites are deliverable once detailed site assessments, proposals and mitigation are provided.

We would further comment that Carlisle City Council are to be commended on their positive engagement and approach to delivering sites, with a number of Story Homes sites being

brought forward through the planning application process to encourage early delivery with a proactive Development Management team working in parallel with their policy officers. In relation to Carlisle South, we would refer to our response above relating to Q5.

Q7. Does the housing trajectory align with the infrastructure delivery plan?

Comments relating to the infrastructure plan are raised under Matter 6.

Issue 4: Whether the monitoring indicated will ensure the 5 year housing land supply is maintained.

Q1. Does the housing delivery monitoring indicators contain a timely trigger that will ensure measures are put in place promptly should the LP not be effective?

No further comments from those submitted through Submission Draft consultation.

Issue 5: Whether the LP will address the affordable housing needs of the area. The SHMA suggested requirement for 5,011 (295 per annum) additional units of affordable housing to meet identified affordable housing needs until 2030.

Q1. What amount of affordable housing can realistically be achieved, without any reliance on the private rented sector, having regard to the location of site allocations and the viable affordable housing targets in the various zones?

Q2. What reasonable alternatives have been considered to address the provision of sufficient affordable housing without reliance on the private rented sector?

No comments raised.

Other Housing Matters

Q1. The Council will be aware of the written Ministerial Statement (WMS) to Parliament dated 25th March 2015. The statement introduces a system of Housing Standards, with new additional optional Building Regulations on water and access, and a new space standard ('the new national technical standards'). This system complements the existing set of Building Regulations, which are mandatory, and rationalises the many differing existing planning standards for housing into a simpler, streamlined system. The WMS provides comprehensive details covering plan making and decision-taking. The WMS sets out the Government's new national planning policy and the setting of technical standards for new dwellings. The Statement should be taken into account in policies on local standards or requirements, in both plan making and decision-taking. In short, since 1st October 2015 decision-takers should only require compliance with the new national technical standards. In light of the WMS are policies in the LP consistent with national policy, particularly Policies CC3 and SP9 (3)?

It is noted that the Inspector's question refers to Main Modification MM57 which is to delete the reference to the Code for Sustainable Homes and BREAAAM in paragraph 7.27 to Policy CC3. The main modifications currently published do not incorporate that MM therefore we reserve our position on behalf of Story Homes to comment further through the examination process once it is published. Nevertheless, we would welcome this deletion as a starting point.

We would also concur with the additional modifications that are being proposed by the HBF in relation to this policy context and would support the suggested modification outlined in their statement, which ultimately would ensure that development proposals are assessed against the relevant Building Regulations prevailing at that time which is wholly in line with

the WMS. Similarly, we would concur with the HBF's comments in relation to Policy SP9 relating to Lifetime Homes Standards.

