

# **Carlisle District Local Plan Examination**

Matters, Issues and Questions (MIQs)

## **Matter 2:**

Housing

## **Statement by Carlisle City Council**

November 2015



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**Issue 1:**

***Q1: Is the methodology for assessing the OAN appropriate and the conclusions supported by the evidence including market signals? If not, why not?***

**1.1** The Strategic Housing Market Assessment (SHMA) Update [EB 002] explored and sought to quantify the objectively assessed need figure for housing in Carlisle District. The study concluded that, from a policy-off perspective, an annualised average of between 480 (demographic) and 565 (jobs-led) dwellings per annum would be required in the 2013 - 2030 period for needs to be met. The Council are proposing a level of provision at the upper end of this scale within the Plan, as now proposed to be modified [MM 02], explicit in requiring a minimum of 9,605 new homes across the 2013 – 2030 period.

**1.2** The 2014 SHMA updated an earlier 2011 assessment. The need for such an update was triggered by the emergence of significant new evidence in the form of new Census data; updated national household and population projections; and updated economic forecasts. It also reflected that revised guidance on undertaking assessments of housing need was set out in the National Planning Practice Guidance (NPPG) which was published in March 2014.

**1.3** The SHMA Update was undertaken by JG Consulting who are considered independent and appropriately experienced experts in this field. The methodology followed has had full regard to the guidance within the NPPG with the approach followed having been deemed appropriate in the context of a number of other recent local plan examinations in England.

**1.4** Chapter 2 of the SHMA Update considers in detail housing market dynamics and market signals. Ultimately this concludes, with the reasoning as to why succinctly set out in Chapter 6 (paras 6.1 – 6.14) of the report, that a departure and upwards adjustment from national projections is both necessary and appropriate in Carlisle's circumstances.

**1.5** Based on the above reasoning the Council consider that the methodology used to assess OAN was entirely appropriate and that the conclusions of the SHMA are supported by the evidence.

**Issue 2:**

***Q1: Is the approximate spatial distribution of 70% new housing in the urban areas and 30% in the rural areas justified?***

**2.1** The 2008 adopted Local Plan split the housing requirement so that 80% of the total would be met in Carlisle and the remaining 20% in the rural part of the District. This division was based on the sustainable strategy of the Plan, and Cumbria Structure Plan policy at that time which required that new development should be met mainly in towns to meet the social and economic needs of the population.

**2.2** At the time of the Issues and Options consultation in October 2011 [SD 029] a question was asked regarding the proportion of overall housing in the urban/rural area, (Q. H2, page 20). A further question was asked regarding the location of housing in the rural area, which had previously been confined to the market towns and larger villages, (Q. H4, page 22).

**2.3** The responses to these questions showed that there was an overall preference for a higher proportion of housing in the urban area, whilst in the rural area, the responses indicated a desire to move away from the (then) current approach, and were split between a desire to identify land for housing in the larger rural settlements, recognising that villages often work in clusters and are reliant on the services each other provides, and to include smaller villages as suitable locations for housing development provided they have good accessibility.

**2.4** At both preferred options consultations, the 70/30 split was broadly supported. As such the spatial distribution of housing arose from two main factors, the response to consultations which identified a desire to allow more housing in the rural areas, thereby freeing certain settlements from a 'sustainability trap', and the actual population split within the District between the City of Carlisle and the rural area, which has remained at approximately 70/30.

**2.5** This distribution is also supported through the process of the Sustainability Appraisal [SD 003] at paragraph 4.30 – 4.39 (under task B3 – Evaluating the likely effects of the Local Plan and alternatives) (main strategic options considered and how they were identified). This sets out the three options that were initially identified at the outset of the plan making process. Option B, where a higher proportion of housing is proposed for the urban area, is shown as having the potential to address more comprehensively the broad range of economic, social and environmental issues. It is important to note that this approach takes account of the number of larger settlements and market towns within the rural area, with a good range of facilities and services, and therefore the capacity to accommodate further development.

**2.6** Furthermore the 2011 Housing Need and Demand Study (SHMA) [EB 003] sets out at paragraph 11.21 that the demographics of the District identified that two thirds of the need/demand is within the urban area and the remaining third is in the rural areas. The 2014 SHMA update [EB 002] at paragraph 3.54 also supports that the demographic projection outputs support the proposed housing distribution in the Plan.

**2.7** This is considered an appropriate approach as not only is the City where the majority of the housing needs arise, this also reflects a desire to enhance the City's role as a sub-regional centre.

**2.8** Specific allocations have been identified within the Plan to contribute, alongside existing commitments and an allowance for windfall, to meeting the growth required for the first ten years of the Plan until 2025. The allocations aim to deliver 2756 dwellings in the urban area and 1379 in the rural area, which equates to a 67/33% split.

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

**2.9** Paragraph 48 of the NPPF states that Local Planning Authorities may make an allowance for windfall development when considering the 5 year housing land supply provided there is *“compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply”*.

**2.10** The reliance on some windfall developments to accommodate growth throughout the life of the Plan is considered wholly justified. This reflects that such developments will continue, as they have done in the past, to make a significant and therefore important contribution to the supply of new homes within Carlisle.

**2.11** The Plan has not, generally for reasons of practicality, sought to allocate sites of less than ten units. Despite this supply from such sites will however be forthcoming with the inclusion of a policy within the Plan (Policy HO 2) specifically to encourage and enable this to happen. Importantly Policy HO 2 does not specify a site size threshold to restrict what will or will not be permitted under windfall provisions, with a criterion based approach instead adopted. This approach therefore enables, in certain circumstances, larger sites to also come forward, with such an approach important given the urban nature of the City and the inability to predict where sites currently in non-residential use may become available for redevelopment within the life of the Plan. It also affords an opportunity for, and flexibility within, Carlisle's many smaller settlements to bring forward new development where it is sustainable to do so. In these regards the ability to support windfall developments must also be recognised in the context of the need for flexibility within the Plan in its widest sense.

**2.12** In the absence of a windfall allowance no regard would be had in the housing trajectory to supply from small sites, sites currently not anticipated to be brought forward for development, that arising from the conversion of existing buildings and where appropriate bringing back into use long term empty homes. The reliance on a windfall allowance addresses this by ensuring that the reality of delivery is reflected within future projections, a necessity to ensure that such projections are as accurate as possible.

***Q3: Can the Council provide evidence of the past delivery of windfall developments to demonstrate the reliance on windfalls is realistic?***

**2.13** The Plan makes an allowance for 100 dwellings per year to be delivered as windfall, equating to a total of 1,500 over the Plan period or approximately 15% of the Plan's housing requirement.

**2.14** Paragraph 48 of the NPPF states with regards to windfall development that *“any allowance should be realistic having regard to the Strategic Housing Land Availability*



*Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens”.*

**2.15** Historically windfall rates within the District have been high as evidenced by Table 2.1 below, the analysis for which has excluded completions within residential gardens. This demonstrates that 66% of the net completions between 2008 and 2015 have been windfall in nature with an annual average of 199.

**Table 2.1 – Historic Rates of Windfall Development (Net Completions)**

<b>Year</b>	<b>Net Completions</b>	<b>On Allocated Sites</b>	<b>Windfall</b>	<b>Windfall %</b>
08/09	366	172	194	53%
09/10	233	98	135	58%
10/11	260	86	174	67%
11/12	429	111	318	74%
12/13	216	106	110	51%
13/14	190	64	126	66%
14/15	419	84	335	80%
<b>Totals</b>	<b>2,113</b>	<b>721</b>	<b>1,392</b>	<b>66%</b>
<b>Average p.a.</b>			<b>199</b>	

**2.16** For the current monitoring year of 15/16 there have been 186 total housing completions to date (as of October 2015) of which 72 (39%) have been classed as windfall.

**2.17** It is recognised that the rate of windfall development is likely to reduce moving forward given the emergence of the new Plan and its policies and proposals which should ensure that the majority of future growth is plan lead. For the reasons set out in response to Question 2 however, the Council maintain that a windfall allowance is necessary particularly to ensure regard is had to likely supply from small sites, conversions, and albeit less infrequent larger windfall sites.

**2.18** Table 2.2 demonstrates that windfall development comprising of small sites and supply from conversions on their own have historically accounted for a sizeable windfall allowance. This rate (average of 82 p.a.) is highly likely to be sustained given the more

pragmatic approach within the Framework and greater flexibilities within the Plan, including Policy HO 2 (which specifically enables windfall development) and the removal for example of settlement boundaries.

**Table 2.2 – Gross Windfall Completions (Small Sites and Conversions)**

Year	New Sites of <10	Conversions	Total
14/15	45	35	80
13/14	25	27	52
12/13	41	41	82
11/12	65	47	112

**2.19** It can be seen going forward that, based on the above, only a modest supply from larger windfall sites, which for the circumstances already outlined are likely to contribute to future supply, would be required to ensure that the employed windfall allowance is met.

**2.20** Looking ahead Table 2.3 demonstrates that there is still a pipeline of windfall development coming forward, as evidenced by the analysis of planning permissions granted. Again differentiating between small-scale and larger sites helpfully illustrates the significant contribution this important source alone will contribute to future windfall completions.

**Table 2.3 – Windfall analysis of permissions granted (by way of no. of dwellings)**

Year	Total	Existing/Emerging Allocation	Windfall < 10	Windfall ≥ 10
15/16 (Q1 + Q2)	490	379	74	37
14/15	313	41	170	102
13/14	898	629	216	53
12/13	688	472	142	74

**2.21** Consequently and by way of reference to the above evidence the Council consider that the windfall allowance adopted is realistic.

***Q4: If so, what assurance is there that such trends will continue?***

**2.22** It is considered for the reasoning already set out (in response to Q1 and Q2) that there can be a reasonable degree of confidence that windfall development, in keeping with the allowance employed, will continue to make an important contribution to the supply of new homes across the plan period.

**2.23** Ultimately windfall delivery rates will be kept under regular review with data reported on an annual basis through the Council's Annual Monitoring Report. Should a significant and sustained drop in actual or anticipated windfall completions occur, the Council will consider the need for interventions informed by the circumstances prevailing at the time.

**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 dwelling per annum (dpa) over the last 4 years of the plan period.***

***(a) Is there any policy 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?***

**2.24** The 2025 date cited within Policy SP 3 of the submitted Plan was originally derived having regard to when supply from the broad location would be required to come on stream. It also reflected a need to ensure that the delivery of allocated housing sites would not be prejudiced as this would be to the detriment of the Plan's overarching strategy.

**2.25** The Council has already set out before the Inspector, in a statement of common ground with Cumbria County Council [EL1.005c], how work to date has highlighted the importance of establishing an integrated masterplanning process for the location. This

must, from the outset, include a clear understanding of the infrastructure implications of growth. Aside from being used to establish a robust delivery mechanism, including a clear approach to developer contributions, this understanding will also help to inform the phasing of development at the location. Whilst there are no additional policy restrictions preventing an early release of the site, ultimately the degree of flexibility will only become apparent as an outcome of the masterplanning process. The completion of the masterplan is considered a legitimate pre-requisite to any development being brought forward. This reflects that a failure to do so would, in the opinion of both the City and Cumbria County Council, be entirely prejudicial to the delivery of sustainable growth in the widest sense.

***(b) Is the housing trajectory realistic, particularly given the large scale infrastructure that is required?***

**2.26** The assumptions made in relation to the trajectory for Carlisle South are considered realistic but importantly on a proportionate basis relative to the long term nature of the projections and currently available evidence. Ultimately delivery rates will be informed by the outcomes of the masterplanning work. An integral part of this work will be a clear understanding of the required infrastructure to support development at the site and a robust delivery mechanism to ensure its timely delivery.

**2.27** Given the commitment to advance masterplanning work in a timely manner (and that such work is currently underway), it is reasonable to assume a clear masterplan and delivery strategy will be in place in good time. Without prejudice it may be that delivery of the required infrastructure could be phased or frontloaded in part by securing external funding and recovered later through developer contributions. The assumptions underpinning the trajectory do not therefore currently envisage that infrastructure delivery will constrain supply especially on the basis of development commencing from 2025, given the lead in time in question.

**2.28** The size and scale of the broad location is also such that it has been assumed that development would commence at multiple start points with it being possible that each of these could be within different localised market conditions so as to avoid market saturation. It has also been assumed, based on emerging anecdotal evidence of interest in the location from the development industry, that the opportunity would appeal

to a much broader range of developers than currently active within the District and that it would be progressed simultaneously by multiple developers. Again in this regard the current lead in time would afford a realistic opportunity for the industry to mobilise.

**2.29** Finally it is considered important context to note that a number of sites within the south are currently actively under construction and progressing well. The size of these sites and therefore build out rates are such that the momentum and confidence should carry forward just as the development of Carlisle South is commencing.

**2.30** Evidently such assumptions would, as part of a focus on land supply more generally, be kept under regular review and reported on, alongside the need for any interventions, within Carlisle's Annual Monitoring Report.

**(c) *How will the infrastructure required be funded and coordinated?***

**2.31** A key objective of masterplanning will be to develop a clear understanding of the required infrastructure to support development at the location and beyond this to ensure that a robust delivery strategy is developed. This is currently reflected in Policy SP 3 as drafted. It is recognised that a particular focus of this work will be on understanding viability and beyond this exploring the available funding options, including developer contributions, which may vary depending on the precise nature of the infrastructure identified as required.

**2.32** The Council's Infrastructure Delivery Plan [EL1.004b] sets out at Chapter 5 the range of general funding options potentially available with respect to aiding infrastructure delivery in Carlisle. It also commits the City Council to actively explore the role of introducing a Community Infrastructure Levy (CIL) which could play a part in helping to deliver the infrastructure required at Carlisle South. Additional and more specific funding opportunities may come to light dependent upon the precise nature and scale of infrastructure which ongoing work identifies as necessary.

**2.33** The City Council set out in a statement of common ground with Cumbria County Council [EL1.005c] how they have secured £250k of infrastructure capacity funding from the national Large Sites Infrastructure Programme to develop an understanding of infrastructure needs in the locality of the location and how this funding is so far being

used. This same statement also details how a successful bid was made through the same programme to secure support from ATLAS (the Homes and Communities Agency's Advisory Team for Large Applications) in order to assist the Council in the initial stages of acting to bring Carlisle South forward. It is therefore contended that the City Council is well placed to be able to advance the appropriate evidence.

***(d) Are the timescales for the adoption of a further Development Plan Document realistic to ensure that development will commence on the site as expected?***

**2.34** Policy SP 3 of the submitted Plan commits the Council to progressing masterplanning work on the site in the short-term, a further commitment to which is contained within the Council's published Local Development Scheme [SD 009] (which envisages work commencing on a separate Development Plan Document in January 2016). Statement EL1.005c sets out that preliminary work on this subsequent plan has effectively already commenced, in the form of evidence gathering, and that such efforts are being supported by ATLAS and aided by the receipt of external funding. A recent example of the support provided by ATLAS can be seen in an outcomes report, appended to this statement, which also provides useful context with regards to the broad location.

**2.35** Consequently the City Council maintain that the timescales for the adoption of a further DPD are realistic and that importantly the preparation of this plan is being genuinely frontloaded as far as is possible. As such the risk plan preparation poses to the timely commencement of Carlisle South is considered low.

**Issue 3:**

***Q1: The Council's Five 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 31 July 2015 (EL1.002c). Does the Council's assessment of delivery justify the application of a 5% buffer?***

**3.1** The City Council maintain that the application of the 5% buffer is most appropriate in Carlisle's circumstances. The reasoning to support this assertion is already before the Inspector having been set out in correspondence dated 31<sup>st</sup> July 2015 [EL1.002c ] submitted in response to the Inspector's initial questions (Question 7) [EL1.002a].

**3.2** For the avoidance of doubt the most up to date five year land supply assessments prepared by the Council are set out in Table Two of their Phased Delivery Statement [EL1.005e]. Notwithstanding the Council's position on this issue, these assessments show that the Council can demonstrate a five year land supply regardless of whether the 5% or 20% buffer is employed.

***The Inspector has indicated to the Council that the buffer should be applied to the sum of the base housing requirement and the shortfall during the plan period (EL1.003a). Based on a requirement of 565 dwellings per year set out in the submitted plan the Council cannot demonstrate a 5 year HLS. The Council suggests a stepped approach to housing delivery is the most reasonable strategy in light of the way in which the five year housing land supply should be calculated. The stepped approach would require an annual average of 477 dwellings (net of clearance) between 2013 and 2020, 625 between 2020 and 2030 (adjusted to have regard to delivery in the 2013 – 2020 period). The Council has prepared a paper which comprehensively details how a stepped housing delivery target would work (Phased Delivery Statement EL1.005e).***

***Q2: Is the Council's approach justified?***

**3.3** The City Council maintain that the suggested introduction of a stepped approach to housing delivery is entirely justified. The reasoning to support this contention is already before the Inspector in the form of the Phased Delivery Statement [EL1.005e].

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

**3.4** The City Council identified potential alternative approaches to addressing the five year housing land supply in their response [EL1.002b] to the Inspector's initial questions (Question 9) [EL1.002a]. Whilst discussed prior to the suggested stepped approach to

housing delivery, the Council maintain that these (which for ease of reference related to allocating additional deliverable land and/or reducing the Plan's housing requirement) still constitute the obvious (theoretical) alternatives.

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

**3.5** The City Council consider that the introduction of a stepped approach to housing delivery is the most reasonable when considered against the alternatives.

**3.6** The Council highlight in their response [EL1.002b] to the Inspector's initial questions (Question 9) [EL1.002a] concerns regarding the likely success of allocating additional deliverable land. Consequently, and based on these concerns, the Council do not consider that allocating additional land constitutes a 'reasonable' alternative.

**3.7** In contrast a reduction in the Plan's housing requirement, whilst undesirable from the Council's perspective, is nevertheless considered to constitute a 'reasonable' alternative which consideration can and should be afforded to. This reflects that the SHMA Update [EB002] identified a range as opposed to single measure of objectively assessed need and that as such a balance/compromise between the two drivers (demographic and economic) could be found i.e. a figure which exceeded the minimum demographic needs of the District which at the same time supports as far as is possible Carlisle's economic aspirations.

**3.8** The advantages of introducing a stepped approach to housing delivery are detailed in the Council's Phased Delivery Statement [EL1.005e]. In summary these are that this approach

- would not alter (and therefore not compromise) the Plan's overall housing requirement and vision (which are broadly supported by many);
- can be seen to wholly align with the evidence (in the form of the SHMA Update) ensuring that supply comes on stream in direct response to when needed; and
- would afford the development industry an appropriate period of time to mobilise within the District.



**3.9** Furthermore the approach would not, contrary to reducing the overall level of need, result in a reduction in the delivery of affordable homes.

**3.10** Based on the above the introduction of a stepped approach it is regarded as preferable to a reduction in the Plan's housing target and as such represents the most reasonable approach in relation to the available alternatives.

***Q5: Is there a realistic and reasonable likelihood that those sites included in the five year housing land supply trajectory are deliverable within the five year timeframe (assessed from 1 April 2015)?***

**3.11** The approach taken with regards to the five year housing land supply has seen sites and their yields/delivery rates considered on an individual basis. The assumptions for each site have been made with regard to the most up to date information from a variety/composition of sources including development management records (including pre-application discussions), building control records, intelligence available from other Council departments including housing and discussions with the development industry specifically on the progress of sites in their control or interest.

**3.12** The Council first published its housing trajectory in September 2014. This predicted 404 net completions in 14/15 with actual delivery being 419. The majority of completions were from the sites expected to yield reinforcing the credibility of assumptions employed with respect to forecasting. This same trajectory predicted 489 net completions for 15/16, with quarterly monitoring indicating that actual delivery will once again align and likely exceed this projection. Whilst completions for the first half of 15/16 stand at 186, evidence supports that, as demonstrated by Table 2.4, the majority of the Districts completions are always realised within the final half of the year. In support of this on the ground activity remains positive in the District with 685 units known to be actively under construction as at October 2015, which by way of reference to Table 2.5 can be seen to be the highest level observed for some years.

**Table 2.4 – Bi-annual completions**

<b>Year</b>	<b>Total Net completions</b>	<b>1<sup>st</sup> half year</b>	<b>Percentage</b>	<b>2<sup>nd</sup> half year</b>	<b>Percentage</b>
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<b>Year</b>	<b>Total Net completions</b>	<b>1<sup>st</sup> half year</b>	<b>Percentage</b>	<b>2<sup>nd</sup> half year</b>	<b>Percentage</b>
14/15	419	109	26%	310	74%
13/14	190	57	30%	133	70%
12/13	216	99	46%	117	54%
11/12	429	179	42%	250	58%
Totals	1,254	444	35%	810	65%

**Table 2.5 – No of dwellings recorded as under construction**

<b>As at (Date)</b>	<b>Total</b>
September 2011	418
March 2012	296
September 2012	294
March 2013	337
September 2013	346
March 2014	401
September 2014	579
March 2015	527
September 2015	635

**3.13** Sites have only been included within the five year supply where they have an existing planning permission in place (which following consideration is likely to materialise) or where there is a strong prospect that planning permission is likely to be forthcoming. Of the forward supply of 3,285 dwellings identified in the five year housing land supply set out within the Council's phased delivery statement [EL1.005e], 895 homes (27%) were on allocated sites but for which an existing planning permission was not as at the 1<sup>st</sup> September 2015 in place. This figure is likely however to reduce as a number of live applications are determined.

**3.14** Consequently there is a confidence that the sites relied upon in the five year housing land supply are deliverable within this time frame.

***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?***

**3.15** The Council contends that the Plan includes sites which are appropriate and deliverable/developable. The allocations include a range of site sizes and locations, ensuring a broad and attractive offer to the development industry.

**3.16** If monitoring indicates that the trajectory risks not being met, in the first instance the Council will seek to work with developers, to identify and understand the barriers to development, and seek to jointly identify and facilitate solutions. A commitment to this effect is already within the Plan.

**3.17** Carlisle's circumstances and the strategy within the Plan are considered to afford sufficient flexibility to bring alternative sites forward if required. From a strategic perspective there is no Green Belt within the District and whilst there are a number of important designations, including two AONBs and a World Heritage Site in the form of Hadrian's Wall, these do not exert any significant degree of constraint on land availability. The same is true with respect to other important constraints including heritage and biodiversity designations and flood risk.

**3.18** It is also pertinent to note that the Plan does not, for good reason, include settlement boundaries. Coupled with the Plans accommodating approach to windfall development (Policy HO2), which is recognised as contributing in a positive way to the supply of housing over the plan period, this approach acts to ensure a high degree of flexibility and that ultimately additional land could be brought forward, if needed, without prejudicing the Plan's strategic principles.

**3.19** The extent to which Carlisle South provides or is capable of providing flexibility in land supply terms is considered within the context of the Council's response to Matter 2, Issue 2, Question 5.

***Q7: Does the housing trajectory align with the Infrastructure Delivery Plan***

**3.20** The trajectory is considered to have had due regard to and therefore align with the IDP for the reasoning set out in the Council's response to Matter 6 Question 1.

**Issue 4:**

***Q 1: Do the housing delivery monitoring indicators contain a timely trigger that will ensure measures are put in place promptly should the LP not be effective?***

**4.1** Appendix 2 of the Plan sets out the Local Plan Monitoring Framework. The monitoring indicators, triggers and possible actions have been devised in order to help the local planning authority assess when and how it should respond to changing circumstances across the District. They provide an objective way of measuring the effectiveness of policies and site allocations within the Plan.

**4.2** The housing delivery policies, namely SP 2, HO 1 and HO 2 have clear outputs, and the monitoring framework sets specific triggers as to when the need for interventions will be considered. Regular housing delivery updates are undertaken quarterly.

**4.3** Monitoring is an ongoing and continual process undertaken by the Council's designated Monitoring Officer. The outcomes are reported in the Council's Annual Monitoring Report. If annual monitoring reveals that the required housing land supply, (plus the appropriate buffer) has not been achieved, then the Council will, in the first instance, seek to work directly with stakeholders to identify any barriers to development, (as set out in paragraph 5.8 of the Plan), and then consider further interventions including bringing forward further allocations. The SHLAA will be maintained as an up to date working document to assist with this objective.

**4.4** The monitoring framework is not intended to include an exhaustive list of triggers and possible actions. For example, by working with developers and other stakeholders to assess why sites may not be coming forward, actions may be identified and undertaken which may not have been foreseen.

**Issue 5: whether the LP will address the affordable housing needs of the area.**

**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?**

**5.1** The level of affordable housing need in Carlisle District, as set out in the SHMA update [EB 002], paragraph 4.89, is acknowledged to be greater than that which can be realistically achieved through the delivery of the affordable housing policy. This is a common conclusion in many SHMAs across the country. Viability evidence as set out in the Affordable Housing Economic Viability Assessment (AHEVA) [EB 006] have been instrumental in setting the thresholds in Policy HO 4. The policy aims of HO 4 facilitate a flexible approach which can be applied on a site by site basis where viability is raised as an issue by the developer.

**5.2** The Plan aims to maximise affordable housing delivery without the requirement to do so being so onerous as to constrain overall delivery of housing. Projected delivery of affordable housing, resulting from the Plan's allocations, is set out in Table 2.6 below. Where planning permission is in place, the actual amount of affordable housing which has been secured is set out in the comments column.

**Table 2.6 Affordable housing delivery predicted from site allocations**

<b>Zone A 30% requirement</b>	<b>Site name</b>	<b>Indicative yield</b>	<b>Affordable housing yield @ 30%</b>	<b>Comments</b>
U 6	Land at Garden Village	169	51	
U 7	Land at Newhouse Farm	509	153	
U 8	Land north of Burgh Road	66	20	15/0621 Draft heads of terms agreed for 30% affordable housing
U 9	Former Morton Park	54	16	

<b>Zone A 30% requirement</b>	<b>Site name</b>	<b>Indicative yield</b>	<b>Affordable housing yield @ 30%</b>	<b>Comments</b>
	Primary School			
U 12	Site to rear of Border Terrier	18	5	14/0975 PP for 18 affordable units
U 16	Land at Deer Park	100	30	
U 17	Land to south west of Cummersdale Grange Farm	60	18	
R 1	Land south of Carlisle Road	250	75	
R 2	Land west of Kingwater Close	60	18	
R 3	Land north of Greenfield Lane	140	42	
R 8	Land adjacent to Beech Cottage	15	4	12/0856 PP for 15 dwellings. 3 affordable bungalows and 1 elderly person's bungalow.
R 9	Land west of How Croft	20	6	
R 15	Land north of Hill Head, Scotby	50	15	
R 16	Land at Broomfallen Road, Scotby	28	8	12/0790 PP 28 dwellings (S 106) 7 affordable units
R 17	Warwick Bridge/ Little Corby North	45	13	
R 18	Land to the south of Corby Hill/Heads Nook Road	30	9	
R 19	Wetheral South	60	18	
R 20	Land west of Steele's Bank	40	12	15/0886 application for 50 dwellings. Decision not yet issued Proposal for 15 affordable units
R 21	Land west of Wreay School	10	3	14/0875 PP for 7 units. Commuted sum = 2 dwellings.
<b>Total</b>			<b>516</b>	
<b>Zone B 20% requirement</b>			<b>Affordable housing yield @ 20%</b>	
U 1	Land to the south east of junction 44	217	43	14/0761 PP for 190 dwellings (not whole site)

<b>Zone A 30% requirement</b>	<b>Site name</b>	<b>Indicative yield</b>	<b>Affordable housing yield @ 30%</b>	<b>Comments</b>
				30% agreed by applicant
U 2	Land north of California Road	200	40	
U 3	Site of Pennine Way Primary School	112	22	
U 4	Land north of Moorside Drive/ Valley Drive	140	28	
U 5	Land between Carleton Road/ Cumwhinton Road	204	41	13/0983 PP for 189 dwellings (not whole site) 56 units (22 affordable rent)
U 10	Land off Windsor Way	300	60	
U 11	Land east of Lansdowne Close/Court	75	15	
U 13	Land east of Beverley Rise	30	6	
U 14	Land north of Carleton Clinic, east of Cumwhinton Drive	126	25	
U 15	Former dairy site, Holywell Crescent, Botcherby	66	13	
U 18	Land opposite Rosehill Industrial Estate	150	30	
U 20	Durranshill Road	70	14	
U 21	Laing's Site, Dalston Road	50	10	
R 4	Site of former Lochinvar School	106	21	
R 5	Land south of Old Road, Longtown	60	12	14/0925 PP for 61 dwellings. 6 low cost and 6 affordable rent
R 6	Land west of Amberfield	25	5	
R 7	Land east of Cummersdale Road	14	3	
R 10	Land at Hadrian's Camp	96	19	14/0930 PP for 99 dwellings 25 affordable units
R 11	Kingmoor Park, Harker Estate	300	60	
R 12	Land east of Monkhill Road	10	2	
R 14	Land at Tower Farm, Rickerby	10	2	

<b>Zone A 30% requirement</b>	<b>Site name</b>	<b>Indicative yield</b>	<b>Affordable housing yield @ 30%</b>	<b>Comments</b>
<b>Total</b>			<b>471</b>	
<b>Overall total Zones A &amp; B</b>			<b>987</b>	

**5.3** The table above demonstrates that the allocations should give rise to 987 affordable houses. In addition to the above, it is anticipated that there will be affordable housing supply from the delivery of Carlisle South, and, although difficult to predict, an element of affordable housing supply from windfall sites.

**5.4** It is the Council's aim to maximise the delivery of affordable housing within the District. To this end, going beyond the implementation of Policy HO 4, the Council undertakes a range of measures to encourage delivery as follows:

- active engagement with Registered Providers including support with regard to bids through the Affordable Homes Programme (2015-2018);
- Demonstration Project (partnership project with the Council, Registered Provider, HCA, Carlisle College and local construction skills through college students) aimed at delivering affordable housing on Council owned sites;
- making Council owned land available for affordable housing projects;
- the Council's Empty Property Strategy, which has a track record of achieving affordable housing from a high percentage of properties brought back into use.

**5.5** In addition, the economic strategy of the Plan aims for growth in the number of jobs overall, including higher value jobs, and for the upskilling of the population. If successful this should theoretically increase the ability of the resident population to access open market housing or the private rented sector without any form of subsidy.

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

**5.6** The Council are proposing a level of provision at the upper end of the scale of Objectively Assessed Need recommended by the SHMA [EB 002]. Aside from being



justified from an economic perspective, pursuing this higher level of OAN can also be seen to positively seek to maximise the contribution that the Plan will make to the delivery of affordable homes. The thresholds included in Policy HO 4 of the Plan, as to when the Council will seek affordable housing provision, have also sought to maximise delivery as far as is possible within the realms of viability. It is also relevant to note that the Plan includes a rural exceptions policy and can therefore be seen to be maximising supply through a variety of provisions.

**5.7** In terms of alternatives, a number exist, none of which however, for the reasons set out below, were considered to be 'reasonable'.

**5.8 Increasing the overall housing target** – It is recognised that doing so and consequently allocating more land would theoretically increase opportunities to secure more housing. The level of growth pursued however is, for reasons already before the examination, an ambitious figure which is not without its challenges in terms of delivery. Aside from concerns regarding the capacity of the development industry generally, it must be acknowledged that these concerns equally apply to Registered Providers within the District. Such concerns are significantly amplified at the present time owing to uncertainties surrounding the Government's right to buy proposals and commitments to rent reductions. Consequently it is unlikely, based on feedback from Registered Providers, that they will be in a position to respond to increased opportunities even when adopting a longer term outlook. Attracting new RPs to the District in these circumstances is extremely difficult and does not therefore offer a solution.

**5.9 Amending the distribution of housing** – Allocating more land within those areas of the District where viability is greatest would theoretically increase opportunities to secure more housing. This would require a higher percentage of housing in Zone A which is generally that within the rural east area of the District. This would see more housing located away from the urban area and depart from the sound reasoning as to why the proposed spatial distribution has been selected. The need to deliver what in any event may only be a modest increase in affordable provision is not deemed to outweigh the dis-benefits of departing from the currently proposed strategy.

**5.10 Adjusting the thresholds and/or tenure mix set out in Policy HO4** – The thresholds and required tenure mix have been set with regards to evidence on viability

and housing needs. It is not considered practically possible to revisit thresholds and to adjust the tenure mix would risk priority needs not being met at the expense of a fixation on the quantity as opposed to quality of affordable housing delivered.

**5.11 Early release of Carlisle South** – The Council’s position with respect to Carlisle South is clearly set out in response to Matter 2, Issue 2, Question 5. Whilst within Zone A (which requires 30% affordable provision) it must be acknowledged that this location would be subject to more detailed viability work particularly within the context of a clear understanding of the required infrastructure. There is therefore no certainty at this time regarding the maximum contribution that Carlisle South can make to the delivery of affordable housing.

**5.12** In conclusion the Council consider that the Plan as drafted can be seen to already be acting to maximise, alongside wider Council efforts, the delivery of affordable homes. For the avoidance of doubt the Council’s position with respect to any reliance on the private rented sector in meeting housing needs is already before the examination by way of correspondence to the Inspector dated the 24<sup>th</sup> July 2015 [EL1.002b].

**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 national 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 on 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 1 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, in particular Policy CC3 & SP9 (3)?***

**6.1** The WMS is clear that the new technical standards should only be required where there is a relevant current Local Plan policy, if they address a clearly evidenced need and where their impact on viability has been considered. Taking each of the new national technical standards in turn;

**6.2** With regards to water, the optional higher standards relate to a reduction in water use per person, per day in water stressed areas. Carlisle District is identified as being within a low water stress classification within the 2013 Water Stressed Areas document developed by the Environment Agency. It is therefore not considered necessary to insist upon this higher standard within Carlisle District.

**6.3** In terms of access, the WMS effectively uplifts Building Regulations to Lifetime Homes Standards through optional standard 'Access to and use of buildings Approved Document M - M4(2)'. Within Policy SP 9 (3) – Healthy and Thriving Communities, reference is made to the Council supporting the development of decent homes that are adaptable for the life course of the occupiers, meeting Lifetime Homes Standards where possible. Paragraph 3.85 of the Plan states that given the numbers of residents in the three oldest age bands (60-74, 75-84 and 85+) are projected to increase across the Plan period, the Plan encourages the development of Lifetime Homes. Including reference to this within the Plan is to encourage development to this standard and is not intended as a mandatory standard. The Council will always encourage development to higher standards where there is a willingness by developers to do so. It is however recognised that changes introduced through the Deregulation Act 2015 subsume Lifetime Homes Standards into Building Regulations. It is therefore proposed to amend Policy SP 9 and supporting text to remove reference to the term 'Lifetime Homes' recognising that this standard is now subsumed in enhanced building regulations, as follows;

*'The Council will, through planning decisions and in fulfilling its wider functions, work with partners to proactively improve the health and sense of wellbeing of the District's population, and reduce health inequalities. The Council will support development of new/enhanced healthcare infrastructure and will aim to ensure that all development contributes to enhanced health and wellbeing outcomes through the following measures:*

... 3. *encouraging the development of decent homes that are adaptable for the life course of the occupiers, ~~meeting Lifetime Homes Standards where possible;~~*

6.4 Additionally updating paragraph 3.85 as follows;

*'3.85 ~~Lifetime Homes is one aspect where~~ **Health and wellbeing** can be improved by ensuring that homes are accessible, inclusive and incorporate design features which add to the comfort and convenience of the home and support the changing needs of individuals and families at different stages of life, their life-course. ~~Bringing Lifetime Homes standards, or elements of them, into the general housing stock should, over time,~~ **This type of development would** allow older people to stay in their own homes for longer, reduce the need for home adaptations and give greater choice to disabled people who cannot achieve independent living due to lack of suitable housing. ~~Lifetime Homes are all about flexibility and adaptability; they are not 'special', but are thoughtfully designed to create and encourage better living environments for everyone. The Local Plan encourages the development of~~ **decent homes that are adaptable for the life course of the occupiers** ~~Lifetime Homes, given the numbers of residents in the three oldest age bands (60-74, 75-84 and 85+) are projected to increase (Cumbria Observatory, Spring 2014) across the plan period.'~~*

6.5 With regards to the new national space standard the Council has conducted a review of a cross section of house types from key developers who operate within the District. From further analysis it is apparent that the majority of dwellings would meet the national space standard. Where this is not the case the differences are marginal as opposed to significant. It is therefore considered that it is not necessary to adopt this national space standard within Carlisle District as to do so may impact negatively on viability within the area and would reduce flexibility. That said, given that this standard can only be described as being marginally larger than the majority of the dwellings that are being developed within the District, it could be argued that an assessment of the viability of development to this standard has already reasonably been considered through the Local Plan Viability Study [EB 001]. Ultimately the Council would like to reserve its position on this aspect of the new national technical standards and would welcome discussion with the development industry on this at the forthcoming hearing sessions.

6.6 Finally, with regards to Policy CC 3, it is considered that removal of reference to insulation within the Policy would ensure that it is encouraging development to higher

energy efficiency standards without stipulating a requirement that differs from that required by current Building Regulations. The following amendments are therefore proposed to Policy CC 3 – Energy Conservation, Efficiency and Resilience;

*Development proposals must take into account the need for energy conservation and efficiency in their design, layout and choice of materials. The principles should be introduced in the early stages of the design process in order to consider the orientation of buildings to maximise solar gain ~~coupled with high levels of insulation to reduce heating costs~~ and introduce options for alternative methods of heating. The efficient and effective use of land, including the reuse of existing buildings and the use of environmentally sustainable and recycled materials is also expected within the design.*

**6.7** It is therefore considered that the Plan and particularly Policy CC 3 & SP 9 (3) are consistent with national policy and the WMS subject to the introduction of aforementioned amendments to the policies and their supporting text.

# APPENDIX 1

South Carlisle Outcomes Report 26 August 2015

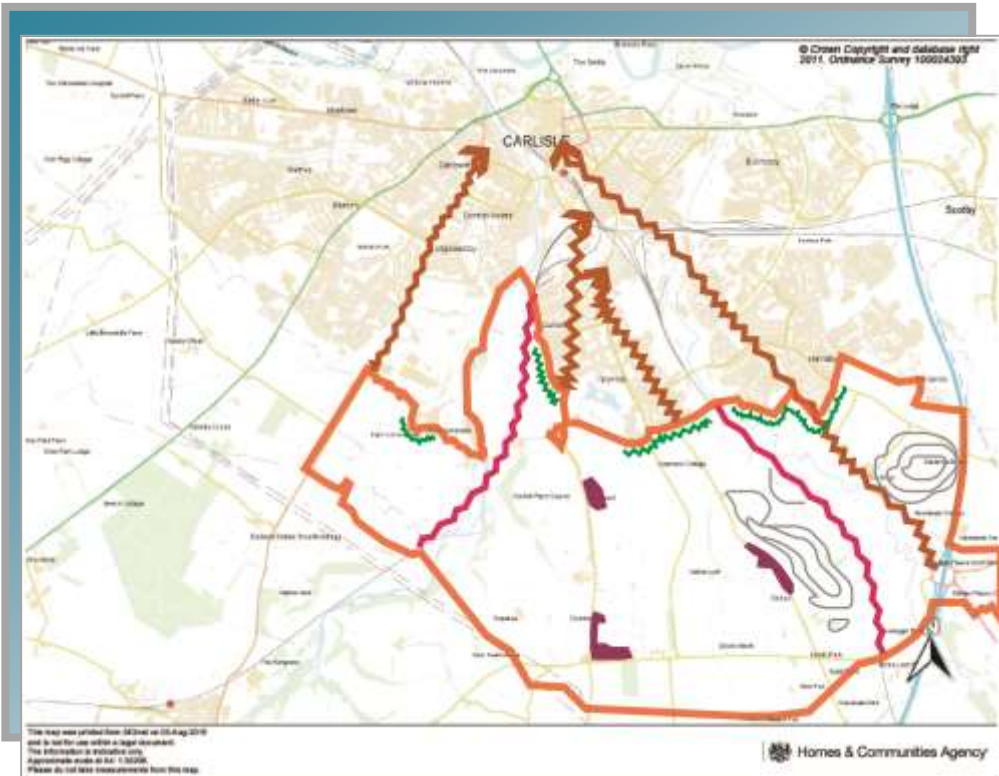
# South Carlisle Initial Officers Workshop 23<sup>rd</sup> July 2015

## Outcomes Report – 26<sup>th</sup> August 2015



Homes &  
Communities  
Agency

Advisory Team for Large  
Applications (ATLAS)



# 1. Background and Purpose

1.1 Carlisle City Council (CCC) are preparing a new Local Plan and policy SP3 of the draft plan proposes to identify land to the south of Carlisle as a broad location for housing led growth. The council recognise that the planning of such a large area will take a number of years and are therefore identifying the area to commence delivery from 2025 onwards although it may be possible to bring forward some components earlier in the plan period. South Carlisle is therefore a long term growth aspiration and although it is intended to deliver up to 1450 dwellings during the next plan period to 2030, the area has the potential to deliver some 10k residential units alongside considerable additional employment development beyond the next plan period.

1.2 CCC have been successful in securing capacity funding as part of the Governments Large Sites Infrastructure Programme in order to progress with key evidence base studies and initial masterplanning. This will accelerate the planning for South Carlisle alongside the Local Plan thereby helping to underpin draft policy SP3 and also provide greater certainty to landowners/developers in regard to the scale and location of development opportunities and also the likely infrastructure requirements. Work has also been jointly commissioned by CCC and Cumbria County Council (CuCC) to undertake a feasibility study into the alignment options for a link road that will provide a vital connection into South Carlisle and will also link with the existing Carlisle Northern Distributor Road (CNDR). As is summarised in Figure 1 below, following adoption of the Local Plan CCC intend to develop a site wide

masterplan/DPD for South Carlisle that will provide a framework to guide and assess future planning applications. It is likely that the future development of the area will involve a number of developer and landowner interests and accordingly the masterplan will need to set out and co-ordinate the delivery of development and supporting infrastructure requirements. Before producing the comprehensive masterplan CCC intend to develop an initial vision and concept framework that will provide more clarity on the scale of the development opportunity and will also inform the brief for the further masterplanning work.

1.3 In order to commence the vision and concept framework CCC asked the HCA's ATLAS team to facilitate an initial officer workshop in order to begin co-ordinating their understanding of the key constraints and opportunities of the site and to test some high level ideas/concepts for the area. The workshop was contained to a small group of officers from CCC and CuCC (see attendance list below) and it is intended to follow the session with more detailed discussions to test the initial ideas and work towards an agreed vision and concept framework. It should also be noted that figure 5 comprises an additional concept plan and shows an alternative link road alignment with related adjustments to the indicative development areas as this reflects more recent discussions and emerging feasibility work for the link road.

1.4 This report summarises and captures the key outputs from the workshop and also recommends next steps in developing a concept framework.



Workshop Attendees Name	Representing
Garry Legg (Investment and Policy Manager)	CCC
Jillian Hale (Planning Policy Officer)	CCC
Chris Hardman (Development Management Manager)	CCC
Jeremy Hewston (Housing Development Officer)	CCC
Richard Wood (Planning Policy Officer)	CCC
Michael Barry (Senior Spatial Planning Officer)	CuCC
Paul Landreth (Transport Modelling Officer)	CuCC
Johnathan Smith (Transport Manager)	CuCC
Ted Thwaites (Area Support Manager)	CuCC
Alison Hatcher (Senior Manager – Economic Development)	CuCC
Jane Garbutt (Business Manager)	Capita
Jane Meek (Director Economic Development)	CCC
Debra Holroyd-Jones (Facilitator)	HCA
David Snelson (Facilitator)	ATLAS

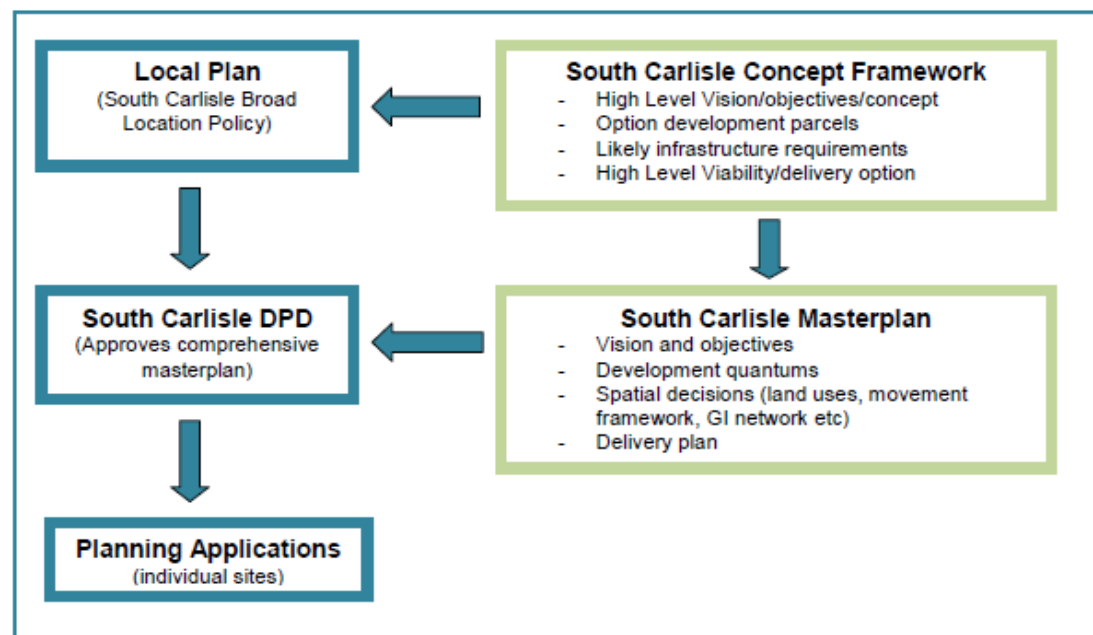


Figure 1: Planning Strategy for South Carlisle

## 2. Opportunities and Constraints

2.1 The officer session began with a discussion to identify the known opportunities and constraints that would influence the development potential for South Carlisle. These are summarised in the table below and captured spatially on the plans at figures 2 and 3.

Theme	Issue	Constraints	Opportunities	Key Masterplanning Considerations
<b>Transport &amp; Movement</b>	New community in South Carlisle will need to have a choice of travel modes	Existing local road network is constrained	Site is served by road connections and also has footpath links to the city centre along river corridors.	Masterplan will need to define key movement connections and any required improvements.
	Highway and transport links connecting Carlisle South to the city centre are all constrained and would not be able to support development. Significant infrastructure will be needed to support development, and this is likely to include a new road linking junction 42 of the M6 to the A595.	Need to design and integrate transport infrastructure into masterplan so it compliments and does not have severe negative impacts such as severance. Funding of infrastructure with significant costs needs to be carefully considered.	Transport infrastructure, including new road linkages will benefit existing residents by helping to alleviate congestion.	Masterplan will need to consider future infrastructure needs, including the route of a potential road. It will be important that the provision of new road infrastructure does not create segregation or barriers.

	Need for other connections from South Carlisle into the City Centre	Existing road connections to City Centre are congested.	Potential to create good quality pedestrian and cycle routes into City Centre	Need to understand where people would want to travel to if living in South Carlisle (e.g. attraction to City Centre for retail, use of CNDR and link road to access employment opportunities)
	Strategic accessibility needs to be considered.	The delivery of new railway stations takes a long time and are costly. This would be therefore a long term proposal as would require significant critical mass to support a business case for investment into a new railway station.	Site is close to the M6 corridor which provides connections to N-S job markets. M6 Junction 42 has a degree of latent capacity to absorb some additional traffic demands. Completion of link road enables links to 'Energy Coast' employment sites to the south west. The Carlisle to Workington railway line passes through South Carlisle and in the long term there may be potential for a new railway station to connect the sites residents with Energy Coast employment sites to the SW.	Need to ensure that the masterplan ensures that strategic linkages are provided particularly to employment opportunities.

<p style="text-align: center;"><b>Facilities and Supporting Infrastructure</b></p>	<p>What are the health, education and supporting infrastructure requirements for South Carlisle</p>	<p>Insufficient capacity at nearby schools and health facilities to cater for additional demands from South Carlisle. Also limitations in extending existing facilities. New retailing in South Carlisle could compromise the City Centre offer so will need to be carefully planned. Long lead in times to get infrastructure programmed into providers business plans so early dialogue required.</p>	<p>The potential scale of development at South Carlisle has the potential to create sufficient critical mass to provide new schools, health and other supporting infrastructure. Reducing the distances for people to travel for essential services will have wider environmental and health benefits.</p>	<p>South Carlisle will need to become a self-sustaining location. It is important that it does not just provide a residential offer but needs to deliver employment, social and community uses to support day to day needs. However this should not seek to compete with or undermine the City Centre offer. Early dialogue will be needed with infrastructure providers to understand their needs and requirements and to also ensure that infrastructure can start to be programmed into business plans.</p>
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<p style="text-align: center;"><b>Green Spaces</b></p>	<p>The development of South Carlisle should ensure the provision of excellent green infrastructure and this could be part of the Unique Selling Point (USP) for the site.</p>	<p>Need to ensure that open space provided in South Carlisle adds to and integrates with the existing strategic provision rather than creating small, dispersed products that are costly to maintain and of little value.</p>	<p>Existing GI assets and networks can link with and extend into South Carlisle. Opportunities for multi functional GI (can also serve as part of drainage, biodiversity, ped/cycle connections, recreation/leisure).</p>	<p>Masterplanning needs to ensure that GI is a strong feature of the development of South Carlisle and maximizes the opportunities for connecting with existing GI networks and assets and also to provide multifunctional opens spaces.</p>
<p style="text-align: center;"><b>Economic Issues</b></p>	<p>Employment development needed within the site.</p>	<p>Need to think about market drivers for these to ensure that they are feasible. Also need to think about relationship of employment with residential areas.</p>	<p>Location of eastern part of the site adjacent to M6 would be attractive to logistics and distribution operators. Western part of the site could accommodate high tech employment offer as better connections with 'Energy Coast' employment sites and also could link with possible hotel and conferencing developments at the racecourse and with potential new railway station.</p>	<p>Masterplan will need to look at the market drivers for employment over the lifespan of the development including the type of offer that would most likely be successful and also optimum location within South Carlisle.</p>

	Racecourse development		Possibility of future conferencing and hotel development close to the racecourse which could attract businesses and also tourism activity.	Masterplan will need to consider how best the racecourse asset can be utilized to generate further economic activity.
<b>Other Physical Site Attributes</b>	Flood Risk	Parts of site lie in flood risk zones 2 and 3 alongside river courses so may reduce size of development parcels and require mitigation.	Opportunity to use watercourses as part of an expanded GI network which can provide leisure, biodiversity and health benefits.	Masterplan will need to fully map and explore flood risk areas to ensure that development parcels are accurately plotted and that any mitigation requirements are identified. The masterplan will also need to define the management of surface water as part of a wider strategy
	Topography	Topography varies across the site but most constrained in terms of establishing development platforms to the eastern part.	Much of the site is gently undulating so possible to create effective development platforms, particularly to the west.	Masterplan will need to identify main development platforms.

	Railway lines	Both the West Coast Main Line and Carlisle to Workington lines dissect the site. This could therefore create barriers and also increase costs for the link road as it will require new bridges.		Masterplan will need to consider the on-going feasibility work for the link road.
	Relationship with existing settlements	Existing settlements (Durdar, Blackwell, Brisco, Cummersdale and also Carlisle's southern wards) are situated within South Carlisle growth area. Key decisions needed in terms of whether development should incorporate these or whether there is a need for buffers.	May be opportunities to improve some settlements by giving access to improved services, GI, connections etc.	Key decisions needed in terms of whether the development should provide buffers to existing settlements.

<b>Design Issues</b>	Need to develop a high quality environment with a mix of products and individual character areas. This needs to be part of the USP for the site.	It will be a challenge to ensure that the development creates sufficiently distinctive and diverse environments with a mix of house types and character areas given the overall scale of the site and quantum of housing.	Masterplan will be a key blueprint for the development. Given the scale of the opportunity it should be possible to develop unique ideas for the character of South Carlisle. This could be advanced and developed through a design competition. Possibility of integrating the history of the site and of Carlisle to create a USP.	Possible design competition for selecting masterplanners in order to generate more aspirational ideas for how to create a USP for South Carlisle. One option could be to explore Garden City principles.
<b>Other Issues</b>	Biodiversity	River Caldew is a SSSI. Number of other nationally protected species and habitats present as well as local biodiversity designations.	Masterplan could seek to better integrate a number of currently isolated/fragmented biodiversity assets.	Masterplanning needs to ensure that biodiversity is a central consideration of GI which should be a strong feature of the development of South Carlisle. Opportunities should be taken to enhance biodiversity particularly with respect to creating integrated ecological networks.



	Effective consultation and engagement strategy is needed.	No significant developer demand currently to promote South Carlisle.	Landowners are supporting the proposed allocation and it has not generated significant opposition. Some landowners are making a case for earlier release of sites.	Work with landowners and developers needed. Also work with infrastructure providers.
	Sustainable energy options	Long build out period and large scale site may make it difficult to implement a CHP/district heating system if phasing is not considered.	Site could utilise the south facing aspect to maximise solar gain and reduce energy consumption. This could form part of the USP and build upon the 'Energy Coast' strategy. Site is adjacent to Pirelli which could make a CHP/District Heating system feasible.	Masterplan will need to develop an energy strategy to explore how the site will maximise the opportunities for sustainable energy. This will need to consider how the phasing of development across the growth area may impact upon the feasibility of sustainable energy options.

Figure 2 – South Carlisle Key Opportunities

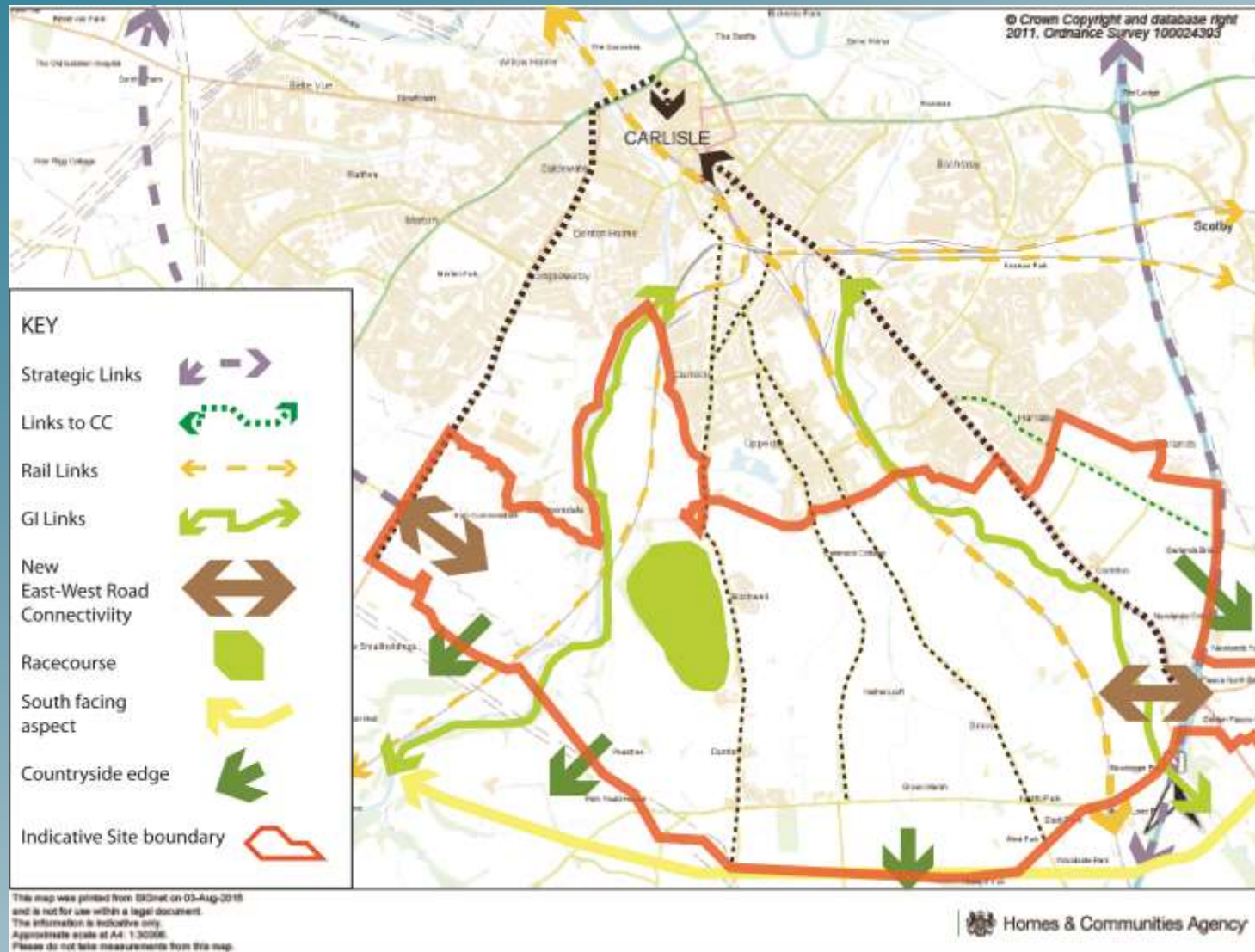
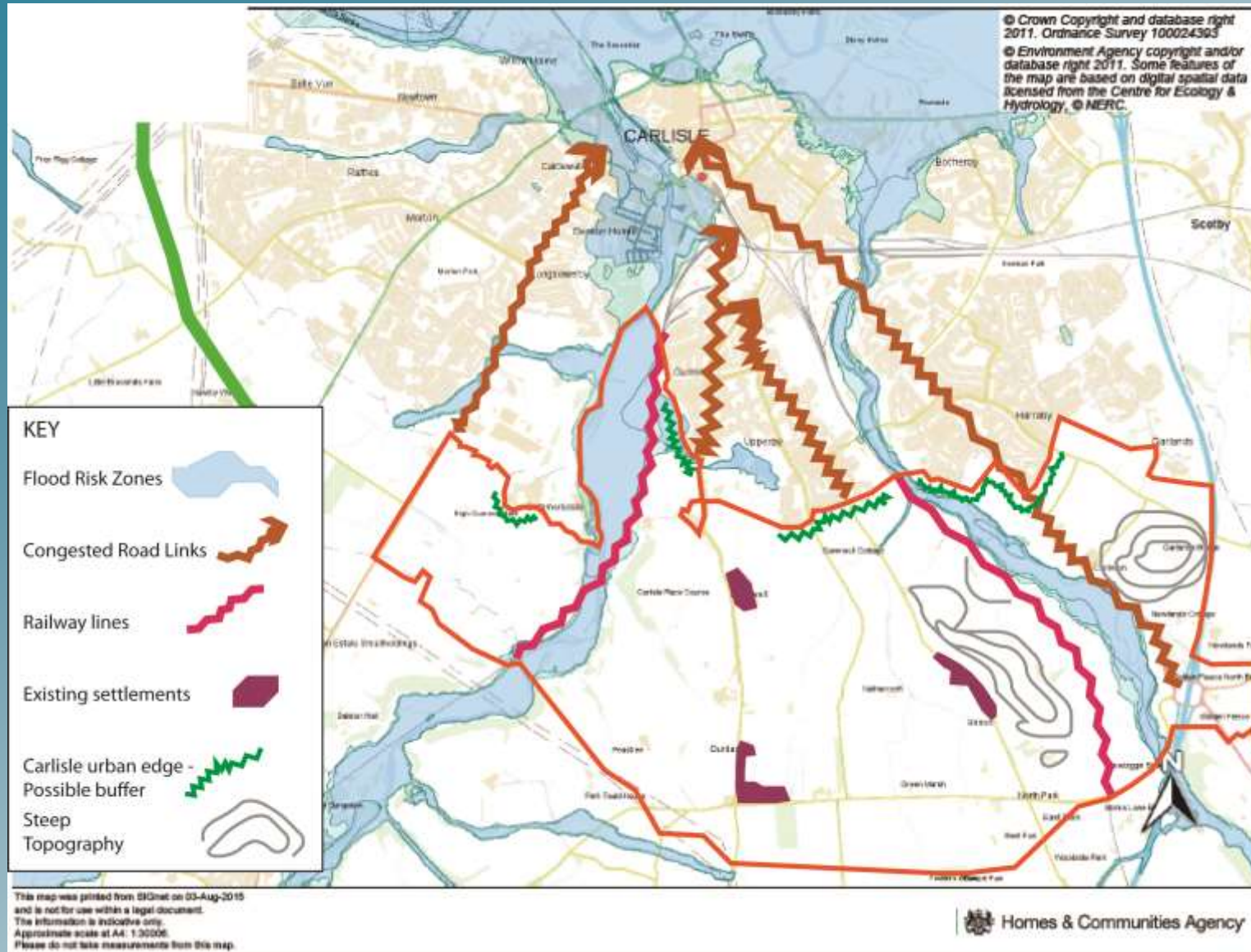


Figure 3 – South Carlisle Key Constraints



## 3. Emerging Vision and Concepts

3.1 Having considered the opportunities and constraints the officer group then identified a series of high level development options for South Carlisle. Essentially the discussion points can be summarised into vision components and associated spatial implications and these are set out in the table below and in the concept plan in Figure 3. As explained earlier in this report consultants have been commissioned to undertake a feasibility study into the possible options of a new east – west link road to unlock the development potential of the area. Through this work, initial and high level route options will be identified which will help inform the on going masterplanning exercise.

Vision Components	Spatial Implications
South Carlisle will be a self sustaining community that does not rely on existing infrastructure and services but provides its own physical, social and community infrastructure.	Need for critical mass of residential sites to enable new facilities (schools, health, local retailing) to be delivered in key locations (hubs).
South Carlisle will provide a choice of transport modes and will seek to reduce further pressures on existing road connections into the City Centre.	Need for attractive and sustainable transport links (pedestrian, cycle) to the City Centre combined with GI network. Also need to explore and future proof for a possible new rail station within the site.
Will provide access to a range of employment opportunities both locally and further afield.	Provision of employment uses within the site (logistics and distribution adjacent to J42 of the M6 and high tech employment opportunities to the western part of the site).
Will provide multi-functional green spaces that will deliver attractive connections from the site to the city centre and to the wider open countryside.	Retain and incorporate existing N/S GI connections and also develop links with key destinations including the Carlisle city centre, the race course and new residential and employment sites.

Figure 4 – Indicative Concept Ideas A

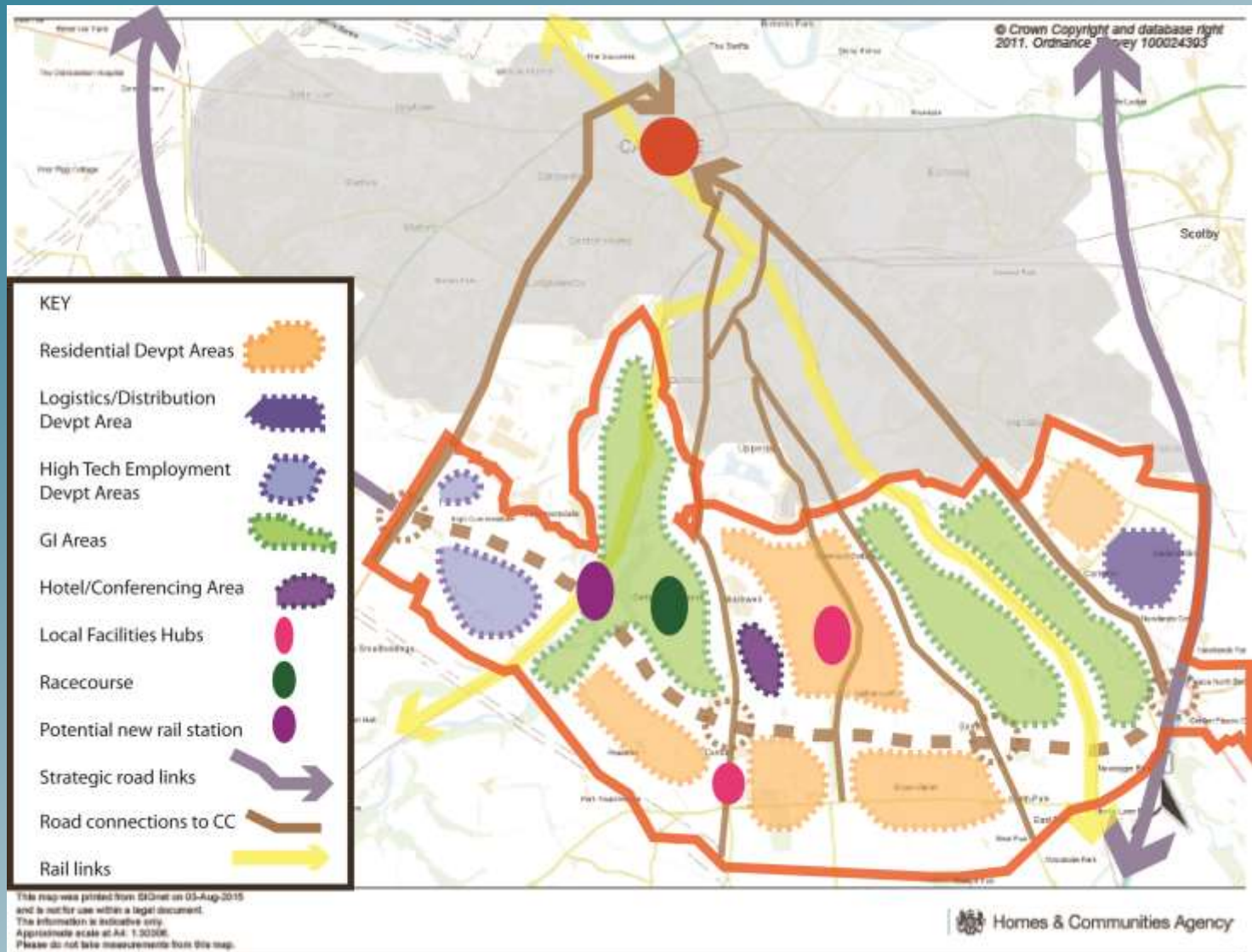
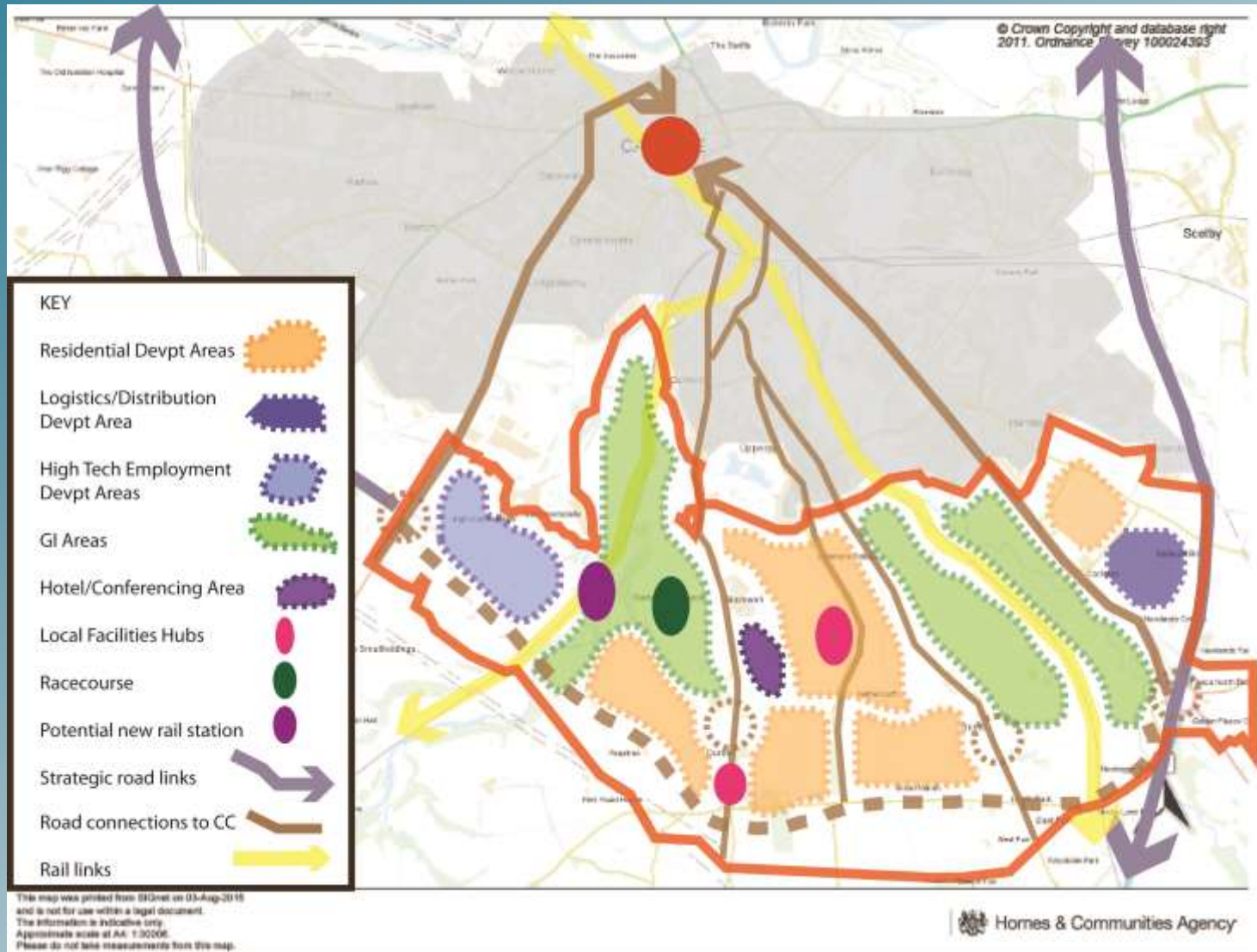


Figure 5 – Indicative Concept Ideas B



## 4. Conclusion and Next Steps

4.1 This report summarises the key discussion points from a workshop held on the 23<sup>rd</sup> July 2015. The session enabled key officers from Carlisle City Council and Cumbria County Council to start to identify the critical constraints and opportunities that will influence the future development of South Carlisle. The session also allowed officers to discuss potential spatial ideas that will help to develop a site specific vision, objectives and concept framework. The issues and options captured in this report will require further testing and analysis and a much greater understanding of site constraints and delivery issues to inform an eventual development framework. However the workshop was a useful in starting to co-ordinate officers knowledge and ideas about the future planning and development of South Carlisle.

4.2 In order to develop the thinking further towards a concept framework and brief for a site wide masterplan ATLAS recommends the following next steps/actions:

- Build on the identification of South Carlisle as a formal Council project by further developing the business case including risk and opportunity assessment. Work up/agree a project plan as an integral part of these efforts that sets out the key tasks and actions to develop the concept framework and masterplan together with a

critical path that aligns individual workstreams (Local Plan production, infrastructure planning). The project plan should also include a commitment of resources from CCC and CuCC as part of a project management structure that will enable and co-ordinate decision making. It should further set out arrangements for engaging and managing stakeholders given the scale and timeframe of the project, the likely infrastructure requirements and the need for political buy in;

- Schedule further officer discussions/workshops covering a wider array of disciplines in order to develop and test the initial ideas that have emerged from the initial session;
- Further discussions and analysis regarding potential alignments and character options for new infrastructure such as a new road are needed. Any new road would be a fundamental parameter in the concept framework and subsequent masterplan and decisions about its alignment should have regard to its intended function and character as well as the technical and financial feasibility. This needs to be considered as the masterplan for development evolves.
- Complete an evidence base audit and identify any key gaps in order to understand and capture further the site constraints that will influence the eventual concept framework (e.g. ground conditions/topography, ecology, viability)



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