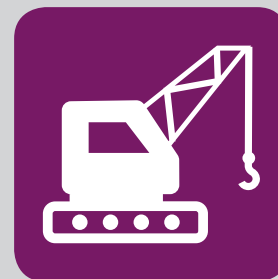




October 2019

Affordable and Specialist Housing Supplementary Planning Document



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Version 2: updated October 2019 to include a revised Map 1 Carlisle Housing Market Areas (page 5) to reflect the new ward boundaries implemented in May 2019, following the 2018 Boundary Commission Review. This update does not materially affect the scope of the content of this Supplementary Planning Document. This document replaces the original version, published February 2018.

Carlisle City Council Affordable and Specialist Housing: Supplementary Planning Document (October 2017) Background/Context

1. Background and Status

1.1 Purpose of the Supplementary Planning Document

The Carlisle District Local Plan 2015-30¹ (The Local Plan) sets out the long-term spatial vision and strategic objectives to support development within the District. The purpose of this Affordable and Specialist Housing Supplementary Planning Document (SPD) is to build upon and provide more detailed guidance, clarity, and consistency in respect of the implementation of the following Local Plan policies:-

HO4 – Affordable Housing

HO10 – Housing to Meet Specific Needs

Delivering the right type of homes in the right locations is essential in meeting the housing needs of Carlisle's population, as well as promoting the local economy. Providing affordable homes and specialist accommodation is integral to the overall housing delivery. A key priority of the Carlisle Plan 2015-18 (aimed at improving the health, wellbeing and economic prosperity of the people of Carlisle) is:-

Address current and future housing needs to protect and improve residents' quality of life.

1.2 Status of this Supplementary Planning Document

Once adopted, the SPD will add further detail and context to existing Affordable and Specialist Housing planning policies within the Local Plan. SPDs do not create new policy or allocate new sites for development.

SPDs are subject to their own adoption process. Local Planning Authorities must be able to demonstrate that they have consulted the community and wider stakeholders for at least 6 weeks on a draft SPD and subsequently taken comments on board. There is no requirement, however, for an SPD to be examined by the Planning Inspectorate, ahead of adoption. SPDs also do not need to be subject to their own Sustainability Appraisal, provided they are attached to a development plan policy that has already been subject to one.

The SPDs will be a useful tool in providing certainty for developers when they are considering how to ensure that their proposals meet the requirements of Local Plan policies. It will also help planning officers to assess the suitability of such proposals against those same policies.



1.3 Affordable Housing Need Evidence (Strategic Housing Market Assessment)

The requirement for affordable housing detailed in Local Plan Policy HO 4 is underpinned by evidence set out in the Strategic Housing Market Assessment (SHMA). The Assessment covers a five year period, and the most recent SHMA, at the time of the adoption of the Local Plan, was completed in September 2014.²

Carlisle has three Housing Market Areas: Carlisle City; Carlisle Rural East; and Carlisle Rural West, which are broken down to ward level, in the map below.

Map 1 Housing Market Areas

Carlisle City Wards:

- Belah and Kingmoor
(excluding Kingmoor Parish)
- Botcherby & Harraby North
- Cathedral & Castle
- Currock & Upperby
- Denton Holme & Morton South
- Harraby South & Parklands
- Newtown & Morton North
- Sandsfield & Morton West
- Stanwix & Houghton
(excluding Stanwix Rural Parish)



Carlisle's September 2014 SHMA identifies the following annual affordable housing need, set out in Table 1, below, over the 5-year period of the Assessment, across Carlisle's Housing Market Areas.

Table 1: Annual Affordable Housing Requirement

Carlisle City	Carlisle Rural East	Carlisle Rural West	Total
201	68	26	295

The headline housing need by property type and tenure identified in the 2014 SHMA are as follows:-

Table 2: Housing Need by Property Type and Tenure (SHMA 2014)

Tenure	<ul style="list-style-type: none"> • 70% affordable / social rent • 30% intermediate low cost home ownership
Property Type	<ul style="list-style-type: none"> • 70% 1-2 bedroom properties • 30% 3/ 3+ bedroom homes

Additional detail on different types of affordable housing is included in Section 2. The Council will keep its housing need evidence regularly under review through the Local Plan period through delivering new SHMA documents, or such other evidence bases as the Government may introduce to supersede the SHMA.

1.4 What is meant by 'Specialist' Housing?

For the purposes of this SPD, specialist housing refers to:-

- Older persons' housing, including Extra Care housing
- Supported housing - homes designed to meet the needs of specific groups of people, including:-
 - Physically disabled people
 - People with learning disabilities
 - People affected by dementia
 - Ex Armed Forces Personnel
- Self-build and custom-build housing
- Community-led development – including Community Land Trusts (CLTs).

Affordable Housing

2 What is Affordable Housing?

2.1 Affordable Housing Tenures

The term 'affordable housing' refers to specific tenures aimed at assisting people who are unable to meet their housing needs on the open market.

There are two main categories of affordable housing:-

- Social/ affordable housing
- Intermediate affordable housing.

2.2 Social Rent / Affordable Rent

Social and affordable rented homes are usually managed by Housing Associations (Registered Providers of affordable housing) - or in areas that have retained their housing stock, by Local Authorities. In Cumbria, all of the Districts, with the exception of Barrow, have transferred their stock to Housing Associations through 'Large Scale Voluntary Transfers'. Carlisle's Council housing stock was transferred to the Riverside Group in December 2002.

- Social Rent: a sub market rental product, based on a 'target' rent, based on a national formula linked to local incomes and property values.
- Affordable Rent: set at a maximum of 80% of a market rent (including any service charge). Affordable Rents were introduced in the (former) Homes and Communities Agency's (HCA's) 2011-15 Affordable Homes Programme, with the intention of superseding social rents in most cases. In Carlisle there is relatively little difference between social and affordable rents.

Social and Affordable rented homes are allocated through the Cumbria Choice allocation scheme.³ All six of the District Councils in Cumbria and the eight largest Housing Associations in the County participate in Cumbria Choice. It is occasionally agreed that applicants can rent the affordable properties themselves, with appropriate conditions in the Section 106 Agreement to ensure these homes remain affordable. In these cases, it would be expected that the applicant (or subsequent owner) should advertise these affordable rental dwellings through Cumbria Choice (or any successor policy) to ensure that they are targeted at households in need of affordable housing. There is a cost for this service.

A list of the main local Housing Associations, including development contacts, is provided in Appendix 8.



2.3 'Intermediate' Affordable Housing

Most 'intermediate' housing tenures are low cost home ownership products aimed at helping people on modest incomes to buy their own home or acquire a stake in the development. The most common intermediate tenures are detailed below:-

- Discounted Sale: properties sold at a fixed percentage discount from market value, so the purchaser buys the whole property at a reduced rate. The percentage discount is then passed on upon each successive re-sale. Carlisle City Council's Low Cost Home Ownership Policy requires a 30% discount on new developments. Further information on the **Council's Low Cost Housing Scheme** is available on the Council's Website.⁴
- Shared Equity: where more than one party has an interest in the value of the home.
- Shared Ownership: a form of shared equity, whereby the purchaser buys an initial share in a home (e.g. 50%) – usually from a Housing Association. A rent is then payable on the element of the home the purchaser doesn't own. The purchaser can buy additional shares (known as 'staircasing') and in most cases they are eligible to 'staircase out' through buying the final share to own the home outright. Restrictions do apply in many of the District's rural locations, where the purchaser can only own a maximum of 80% of the equity, due to a shortage of affordable homes in rural areas.
- Rent to Buy: properties are rented, through a shorthold tenancy, at a reduced rate of approximately 20% below market rent for a fixed period (e.g. five years). The expectation (although not obligation) is that the shorthold period allows the tenant the opportunity to save for a cash deposit towards buying a share of the home.
- Intermediate Rent: rents higher than a social rent, but less than a market rent – intermediate rents have been largely superseded by affordable rents.
- Starter Homes – homes sold with a 20% discount from market value targeted at young first-time buyers (aged 23 to 40) with a household income of less than £80,000 on properties up to £250,000 (outside London). The discounts apply for 15 years rather than in perpetuity, as in the case of discounted sale. The Housing White Paper (2017) stated that the Government intended to amend the NPPF to require 10% of Starter Homes on new developments.

3 National and Local Planning Policy Context

3.1 National Planning Policy

- National Planning Policy Framework (NPPF)

The NPPF5 sets out the Government's planning policies for England, and how these are expected to be applied. The following chapters are particularly relevant to Housing:-

6. Delivering a wide choice of high quality homes; &
7. Requiring good design.

- National Planning Practice Guidance (NPPG)

The NPPG6 is a Government Website providing revised and updated planning guidance, supporting the NPPF.

Paragraph 31 of the NPPG stipulates that exemptions from onsite affordable housing requirements can be claimed for small sites (10 units or less and which have a maximum combined gross floor space (gross internal area) of 1,000 square metres).⁷

3.2 Local Planning Policy

Local affordable housing planning policies must be in accordance with the definition of affordable housing in the NPPF and NPPG.

Affordable Housing is covered by Local Plan Policy **HO 4** (set out in Appendix 1). The policy sets affordable housing thresholds for different zones, linked to site based viability – a map identifying Zones A, B and C is shown in **Map 2**, below.

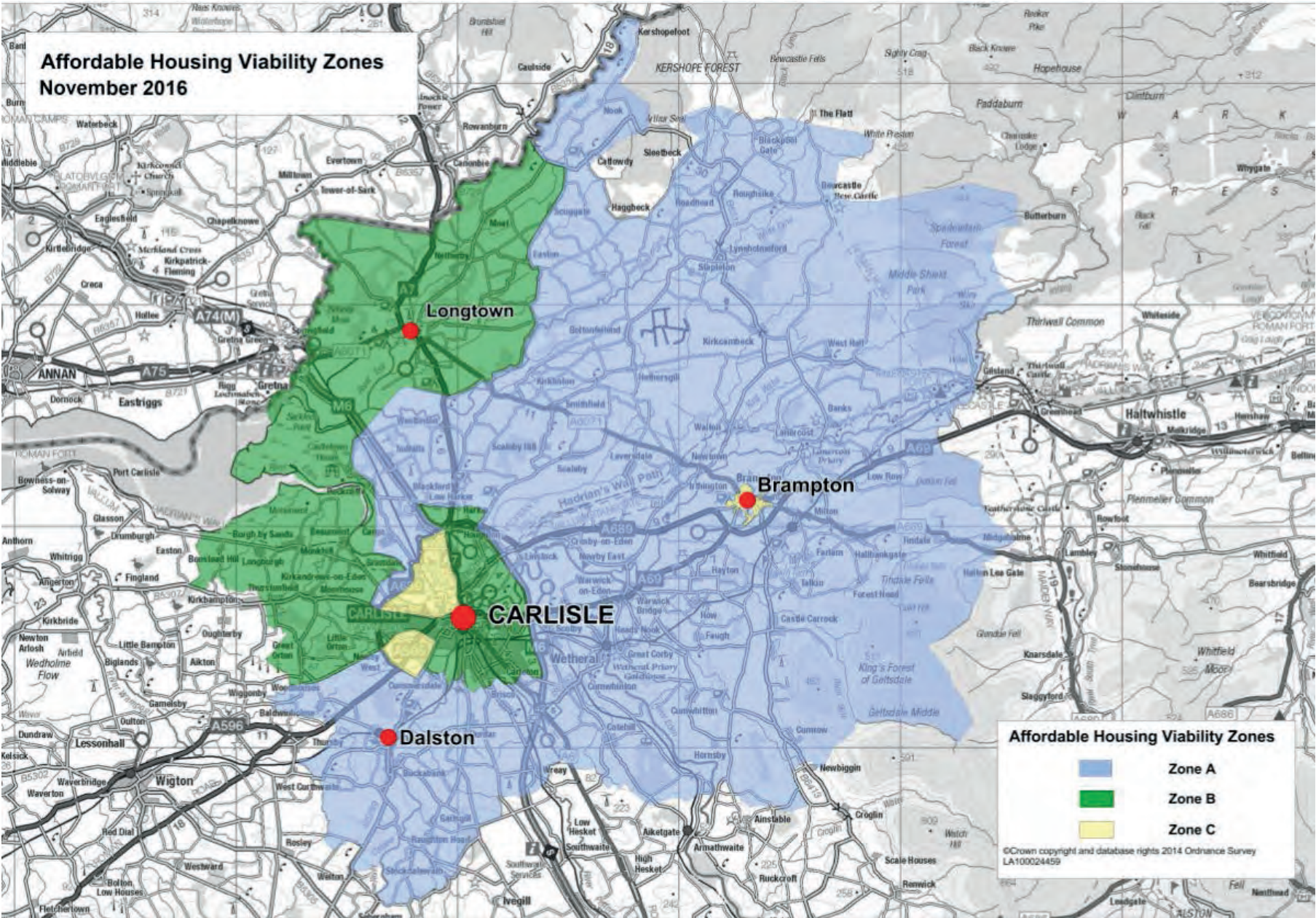
Zone A: the affordable housing threshold is 30% onsite affordable housing on sites of 11 or more units. On sites of 6-10 units a 'commuted sum' financial payment will be required as a contribution towards delivering affordable housing rather than onsite affordable housing.

Zone B: the affordable housing threshold is 20% onsite affordable housing on sites of 11 or more units.

Zone C: the affordable housing threshold is 30% onsite affordable housing on sites of 11 or more units.

If applicants are unsure which Affordable Housing Zone their site falls within it is recommended they confirm this with the Council's Planning team.

Map 2 Affordable Housing Viability Zones



3.3 Exempt Development

Local Plan policy HO 4 Affordable Housing will apply to all residential developments apart from the following exceptions:-

- Residential Care/ Nursing Homes (not including Extra Care or similar independent older persons' schemes)
- Hostels (providing supported accommodation)
- Student Accommodation – where this is provided by, or directly linked to, a local further or higher educational establishment, such as the University of Cumbria or Carlisle College.

4 How is Affordable Housing Funded?

4.1 Affordable Housing Funding Mechanisms

The most common methods of affordable housing delivery are detailed below:-

- Developer contributions through planning obligations on new housing developments or conversions (controlled through Section 106 Agreements)
- Grants - usually through Homes England (formerly the Homes and Communities Agency (HCA)). These grants are usually made to Housing Associations, or those Councils that have retained their housing stock, although private developers can also register with Homes England. Historically, the majority of these affordable housing grants have been for social or affordable rented accommodation; however, the Government are now also keen to promote shared ownership and rent to buy models
- Recycling capital receipts from property sales – relating to Housing Association properties
- Cross-subsidy from commercial arms of Housing Associations/ open market housing.

5 Affordable Housing Delivery

5.1 Am I Expected to Provide Affordable Housing On Site?

Local Plan policy HO 4 makes it explicit that the Council's expectation is that on sites of 11 or more units affordable housing will be delivered on the application site, demonstrating the Council's commitment to creating mixed sustainable communities.

5.2 Under What Circumstances is Offsite Affordable Housing Permitted?

Exceptions to onsite delivery can only be agreed in cases where it can be robustly justified that there would be obvious benefits in providing the affordable housing (through completed units or a financial contribution) on an alternative site – the Council's position on this issue is set out in paragraphs 5.35 and 5.36 of Local Plan Policy HO 4.

On the rare occasions where offsite affordable housing provision is considered acceptable, this would usually be where the alternative site is in a more suitable and sustainable location for affordable housing – e.g. in closer proximity to employment, schools, public transport, local shops and services. Offsite provision should, where possible, be provided in the same Housing Market Area as the application site (Carlisle City; Rural Carlisle East; Rural Carlisle West).

5.3 How are Affordable Housing Units/Contributions 'Rounded'?

- a) Onsite affordable housing contributions: will be rounded down to the nearest whole unit. This approach ensures that the Council does not seek an affordable contribution higher than the target set in Local Plan policy HO 4, as well as assisting with viability, especially on smaller sites:-

Example: 26 unit scheme in Zone A or C (30% affordable requirement)
= 26 (units) x 30% = 7.8 – rounded down to 7 affordable units.

- b) Financial contributions on small rural schemes: will apply on 6-10 unit rural developments in Affordable Housing Zone A. The discount required will be based on 30% of the market value (equivalent to the discount under the Council's Low Cost Home Ownership scheme) of the required no. of affordable homes, had they been on site (see section 5.5), rather than the 50% affordable/social rent & 50% intermediate housing otherwise required under Local Plan policy HO 4. This is in recognition of the fact that it is often difficult to deliver affordable homes for affordable/ social rent (which require approximately double the level of discount) on small rural schemes; basing the total financial contribution on the 30% discounted sale requirement will therefore further assist with viability, in addition to rounding down the affordable housing contribution.

Example: 9 unit scheme x 30% affordable contribution = 2.7 units, rounded down to 2 affordable units – affordable contribution on both units will be equivalent to a 30% discount from open market value.

5.4 How are Offsite Affordable Housing Contributions Calculated on Sites of Eleven or More Units?

In exceptional circumstances, where it has been agreed between the Council and the applicant that the affordable housing can be provided on an alternative site (usually within the same Housing Market Area) then an equivalent number of affordable units must be delivered on the alternative site to meet the housing need identified in the SHMA (or any similar housing needs assessment that may replace the SHMA in the future).

Completed affordable units on the alternative site would need to comply with the equivalent property type and tenure requirements had they been on the application site, or an alternative acceptable to the Council (e.g. if the alternative site was providing bungalows meeting an identified need from older persons).

In cases where the value of properties on the application site is considered to be significantly higher than on the alternative site then an economic viability assessment would usually be required (see Section 8) potentially leading to additional units and/ or a commuted sum being required. Where the units on the alternative site are considered to be of an approximately equivalent market value then this will not be required.

Affordable units on any alternative site would usually be required to be completed prior to the completion of development on the applications site. In cases where this was not possible, the Council would require a guarantee of an equivalent financial payment towards the delivery of affordable housing, meeting an agreed timescale, in case the affordable scheme was not developed for any reason.

A financial payment (commuted sum), equivalent to the cost of providing the affordable units onsite, would only be considered in circumstances where it had been agreed the application site was not suitable for affordable housing, but no alternative site was immediately available. The Council would only agree to such an arrangement on condition that the Council had up to 10 years to spend the commuted sum funding on an alternative affordable housing provision (in the event of phased payments this would only apply from the date of receipt of the final payment).

5.5 How Are Financial Contributions (Commutated Sums) Calculated on Six to Ten Unit Schemes in Affordable Housing Zone A?

The mechanism for determining the financial contribution required towards affordable housing, on 6-10 unit schemes in Affordable Housing Zone A (in respect of the equivalent no. of units and discount from market value, had the affordable units been provided on site) is set out in paragraph 5.3 c). The site specific affordable housing contribution would be determined using one of the options below:-

- a) Market Value of Onsite Units:** if the units on the application site would be suitable for providing affordable housing the contribution would be based on the value of those units.
- e.g. on a 9 unit scheme the contribution would be equivalent to 30% of the units being affordable (= 2.7: rounded down to 2 whole units) at a 30% discount from market value. Assuming each affordable unit has an open market value of £160,000, then the financial contribution would be: £160,000 (OMV) x 30% (discount) = £48,000 x 2 (no. of units) = £96,000.
- b) Lower Quartile Property Price Data:** if none of the units on the application site were suitable units for affordable housing (e.g. an Executive type scheme entirely made up of larger detached units) then 'lower quartile' data will be applied. Lower quartile is the 25th centile, or median of the lower half of the data set, and is considered a reasonable benchmark of entry level property prices.
- In most cases, ward level property price data will be used (using the most recent CACI Paycheck figures – or any alternative dataset the Council may use in future), unless it is considered that the application site is not typical of property prices within the ward, in which case Housing Market Area (HMA) level data will be used.
- e.g. based on the same example shown above of a 9 unit scheme requiring a contribution equivalent to 2 affordable units, but this time based on ward level data, and assuming the site falls within Dalston ward: £160,995* (OMV) x 30% (discount) = £48,299 x 2 (no. of units) = £96,598. (*example based on 2017 CACI Streetvalue lower quartile data for Dalston ward).

5.6 Is Pre-Application Planning Advice Available?

The Council currently provides a free service offering advice and assistance prior to the submission of a planning application. It is recommended that anyone intending to submit a planning application makes use of this service by speaking to the Council's Planning Officers as well as the Housing Development Officer, as it is much easier to rectify any issues or problems if they are identified at the earliest opportunity, rather than unravel any difficulties at a later stage.

Early engagement with local Housing Associations is recommended in respect of: the price they are able to pay for the units (important in respect of site based viability); the type and specification (including the Association's space standards) of homes for social/ affordable rent; and the location of the affordable units within the development. The Council's preference is for the developer to partner with a Housing Association at an early stage to minimise any potential delays in the planning application process.

5.7 Affordable Housing Statement: What Information is Required?

Applicants will be required to submit an Affordable Housing Statement to accompany their planning application. The information required is detailed in Appendix 2.

5.8 What Level of Affordable Housing is Required on the Conversion of Existing Residential Buildings?

Where an existing residential building is converted to form more dwellings, then any affordable housing contribution is based on the number of net additional units. For instance, if a very large house was converted into 12 small self-contained apartments, then the onsite affordable housing contribution (at 30% in Zones A and C, and 20% in Zone B) would be based on 11 units.

5.9 Vacant Building Credit: When Does this Apply and How is the Affordable Housing Contribution Calculated?

Vacant Building Credit applies in respect of empty buildings brought back into use or demolished for redevelopment. The developer is entitled to a financial credit equivalent to the existing gross floor space of those vacant buildings when affordable housing contribution is calculated. Vacant Building Credit does not apply in cases where a building has been abandoned. The relevant paragraphs (21 to 23) from National Planning Practice Guidance are included in Appendix 5.

Examples are provided below for how Vacant Building Credit will be applied in Affordable Housing Zones A and C (30% affordable housing contribution) and Zone B (20% affordable housing contribution) based on the following example:-

Existing vacant building to be demolished or converted = 825 m² (GIA)

Proposed development of 28 flats resulting in a total floorspace of 1575 m²

Increase in floorspace = 750 m²

750 m² as a percentage of overall development of 1575 m² = 48%

Zone A & C: 28 flats x 30% (affordable contribution) = 8.4 x 0.48 (percentage) = 4.03 (rounded down to 4 affordable units)

Zone B: 28 flats x 20% (affordable contribution) = 5.6 x 0.48 (percentage) = 2.69 (rounded down to 2 affordable units).

Details of 'rounding' calculations for affordable housing are included in paragraph 5.3. Should an affordable housing commuted sum payment be agreed in lieu of on-site provision, the sum required would be equivalent to providing the affordable housing on site.

5.10 Residential Conversions under Permitted Development Rights: Are they Exempt from Affordable Housing Requirements?

Where buildings (e.g. offices) are converted to residential use under Permitted Development Rights (PDR) there is no requirement to provide any affordable housing.

It is recommended that applicants wishing to convert offices or other buildings to residential use refer to Part 3 Changes of Use, of the appropriate section of the Town and Country Planning (General Permitted Development) (England) Order 2015.⁸

5.11 Do the Discounts on Low Cost Housing Remain on the Properties in Perpetuity?

Yes. The discount (usually 30%, but less on some older schemes) is passed on to successive occupiers. Only in exceptional circumstances would the Council consider agreeing to the discount being removed (and not at all on the initial sale). Under such circumstances, the owner would be required to pay 50% of the (e.g.) 30% discount to the Council upon completion of the sale, which the Council would use towards the provision of affordable housing elsewhere in the District. The Council would only consider waiving this arrangement under extreme circumstances (e.g. property severely devalued due to damage caused by natural disaster). The owner would also be expected to pay any associated legal costs.

5.12 Does the Council Have Any Guidance on Draft 'Heads of Terms'

in Respect of Section 106 Planning Obligations?

Draft Heads of Terms, in respect of affordable housing and other S106 contributions are available on the Council's Website.⁹

5.13 How are Affordable Housing Financial Contributions Spent?

Financial contributions will be used to deliver new affordable housing. Where possible, affordable housing contributions will be spent within the same Housing Market Area (see Map 1, paragraph 1.3). However, if, despite the Council's best endeavours, it is not possible to identify a suitable development opportunity in the particular Housing Market area then receipts can be pooled and spent within the District.

The Council will require up to 10 years (from the receipt of the final tranche) to spend affordable housing commuted sums. This is because it will often be necessary to pool receipts from more than one scheme (particularly in rural areas where the sums are often smaller and insufficient to deliver new affordable homes on their own) and also as the Council will not always have specific sites lined up to use the funding.

6 Rural Affordable Housing

6.1 Affordable Housing Financial Contributions on 6 to 10 Unit Schemes (Affordable Housing Zone A)

Affordable housing contributions will be required on housing schemes of 6 to 10 units in Affordable Housing Zone A – identified in Map 2, section 3.2. The mechanism for calculating affordable housing financial contributions on 6 to 10 unit schemes is set out in section 5.5. Affordable housing contributions will not be required on rural sites of 5 units or fewer. Onsite affordable housing is required on schemes of 11 units or more in Affordable Housing Zones A, B & C.

6.2 Spending Section 106 Affordable Housing Contributions in Rural Areas

As affordable housing contributions on rural schemes are often for relatively small amounts, which would not be sufficient to develop an affordable housing scheme on their own, it will generally be necessary to pool affordable housing contributions, meaning it will not always be possible to spend them within the same settlement or parish. However, wherever possible, they will be spent within the same Housing Market Area (Rural Carlisle East or Rural Carlisle West). If, despite the Council's best endeavours, it is not possible to identify a suitable development opportunity in the particular Housing Market area then receipts can be pooled and spent within the District.

6.3 Rural Exception Sites

In certain cases sites in rural areas that may otherwise not have received planning permission may receive permission for affordable housing (possibly with an element of enabling market housing) to meet an identified need. These sites would need to be in sustainable locations (the NPPF is clear that Local Planning Authorities should avoid allowing new isolated homes in the countryside). Applicants should refer to Local Plan policy HO 5 Rural Exception Sites.

7 Sub-division of Sites

Local Plan policy HO 4 is explicit that the sub-division of sites to avoid paying affordable housing contributions will not be permissible: “It will not be acceptable to sub-divide sites and purposely design a scheme to avoid making affordable housing contributions.”

The Council's Planning Services will monitor planning applications accordingly to ensure small applications are not brought forward in a piecemeal fashion. In cases where an earlier planning permission has been awarded, additional affordable units will be required on subsequent applications to ensure the total number of affordable properties across two or more applications is compliant with the policy requirement for the overall combined site.

For example - if the same landowner/ developer submitted a planning application for 10 units in Zone B (one unit below the threshold at which the onsite affordable housing requirement would apply); then followed this up with another application on an adjoining piece of land for a further 10 units, then the contribution required on the second application site would be based on the total 20 units over the two sites: 4 affordable dwellings would therefore be required (in accordance with the 20% affordable housing requirement in Affordable Housing Zone B).

Some sites which would meet the requirement for affordable housing provision may progress in a piecemeal process through a number of applications as housing is developed. The Local Planning Authority will consider the use of legal agreements on a number of applications and with subsequent interested parties to ensure that the original requirement is met.

Consideration will be given to the timescale over which a site is developed and should development stall or be delayed, the affordable housing contribution would only be re-considered where there has been a direct link to the viability of the development.

8 Site Based Viability

8.1

The Council will consider a proportional reduction in the level of affordable housing contribution required in cases where the applicant can robustly justify that the development site could not viably yield the Council's affordable housing target.

8.2

A standard economic viability template is included at Appendix 4. It is recommended applicants use this template, which should be completed in conjunction with the economic viability guidance in Appendix 3. Due to the specialist nature of this area of work, Appendices 3 & 4 have been produced by Lambert Smith Hampton, who provide planning viability consultancy services to a number of Local Authorities in Cumbria.

8.3

Wherever possible, the viability assessment should be carried out as soon as possible within the planning process; although it should be based on the final proposed scheme to avoid the cost of more than one viability assessment.

8.4

Land value – applicants should ensure that all planning obligations are factored into the land transaction price (securing an option to buy sites subject to securing planning permission is advisable). This approach embeds the requirement for affordable housing into land values, improving the transparency and consistency of the viability process.

8.5

Fees for Financial Viability Assessment Reviews (FVARs) will be split 50/50 between the Council and applicant, as the Council only has limited resources to fund this work. Where possible, the Council will negotiate a fixed fee with a suitably qualified and experienced firm of Chartered Surveyors. The applicant will be expected to provide their share in advance. Where additional fees arise due to applicants disputing the consultant's findings, it is expected that the applicant will fund the cost of the resulting additional Surveyors' fees.

9 Affordable Housing Design Standards

9.1 Local Plan & Supplementary Planning Design Requirements

Good design ensures attractive, usable, and adaptable places, and is integral to securing sustainable development – these principles are applicable to affordable as well as market housing. New development should make a positive contribution to enhance the character of the local environment. The design should reflect the distinctiveness of the urban streetscape or rural character of an area; utilise appropriate materials and detailing; reinforce local architectural features, and respect the historic environment, including heritage assets.

Applicants should refer to the Council's following policy and guidance:-

- Carlisle District Local Plan Policy SP 6 – Securing Good Design.
- Carlisle City Council's Achieving Well Designed Housing SPD.¹⁰

9.2 Minimum Space Standards for Affordable Homes

The Council expects that affordable homes will be designed to meet comfortable space standard. The dwelling sizes shown in Table 4 were provided by the largest Housing Associations currently operating and developing in Carlisle District, through the Affordable and Specialist Housing SPD consultation. These recommended standards, which are smaller than Homes England or National Space Standards, have been included as guidance for applicants to help inform their negotiations with Housing Associations.

Table 3: Housing Association Affordable Unit Size

Unit Type	Housing Association Expected Space Standards (GIA*)
1 bed 2 person Apartment	47 m
2 bed 3 person Apartment	57 m ²
1 bed 2 person Bungalow	47 m ²
2 bed 3 person Bungalow	60 m ²
1 bed 2 person House	50 m ²
2 bed 3 person House	65 m ²
2 bed 4 person House	74 m ²
3 bed 4 person House	80 m ²
3 bed 5 person House	87 m ²
4 bed 5 person House	90 m ²
4 bed 5 person House	100 m ²

(*The Valuation Office definition of Gross Internal Area is detailed in Appendix 6)

It is also expected that homes for intermediate low cost home ownership will be provided to similarly comfortable space standards.

It is appreciated that these standards may not always be achievable in all cases (usually in respect of the conversion of an existing building); in which case applicants are advised to bring this to the Council's attention through pre-application discussions.

9.3 Flood Resistance & Resilience

Applicants should refer to Local Plan policy CC4 Flood Risk and Development. Additional British Standards guidance can be found in BS 85500:2015: Flood Resistant and Resilient Construction - Guide to Improving the Flood Performance of Buildings.

Information on Flood Zones and flood mapping can be found on the Environment Agency's Website.¹¹

Guidance on requirements for preparing Flood Risk Assessments on planning applications is available from DEFRA and the Environment Agency.¹²

10 Community Infrastructure Levy (CIL)

Affordable housing cannot be funded through CIL receipts and because of this they are not subject to the S106 'pooling' restrictions. Paragraph 99 of the Planning Policy Guidance - Community Infrastructure Levy states: "For provision that is not capable of being funded by the levy, such as affordable housing, local planning authorities are not restricted in terms of the numbers of obligations that may be pooled, but they must have regard to the wider policies on planning obligations set out in the National Planning Policy Framework ..."

Specialist Housing

11 Older Persons' Housing

11.1 Impact of Demographic Change on Carlisle's Housing Requirements

Elderly persons' accommodation is covered by Local Plan Policy HO 10 – Housing to Meet Specific Needs. Policy HO 10 identifies that there is a greater proportion of people in all age groups from age 45 onwards within Carlisle District compared to the national average, and that this is more acute in Carlisle's rural areas, with nearly 30% of residents in both of Carlisle's rural Housing Market Areas (Carlisle Rural East and Rural West) aged 60 or over.

The table below, showing POPPI (Projecting Older People Population Information) figures, based on Office of National Statistics (ONS) trend-based data, updated in July 2017, highlights the significant projected increase in the number of older people, aged 65 and over in Carlisle District, including an acute increase in the number of people aged 85 and over.



Table 4: Projected Increase in the Number of Older Persons in Carlisle

Projected Changes in the Numbers and Percentages of People Aged 65 and Over and 85 and Over (2017-2035)					
	2017	2020	2025	2030	2035
Total population	108,500	109,000	109,700	110,300	110,500
Population aged 65 and over	22,900	24,100	26,300	29,300	31,300
Population aged 85 and over	3,200	3,400	4,000	4,800	6,200
Population aged 65 and over as a proportion of the total population	21.11%	22.11%	23.97%	26.56%	28.33%
Population aged 85 and over as a proportion of the total population	2.95%	3.12%	3.65%	4.35%	5.61%

POPPI data identifies a substantial projected increase in the number of older people across Carlisle District between 2017 and 2035. The POPPI projections show a 37% increase in the number of people aged 65 and over; including a 94% increase in people aged 85 and over (who are more likely to require adapted accommodation or housing-related support). This will have a significant impact on the type of accommodation and care provision required.

The increased need for accommodation suitable for older persons, linked to these changing demographics, is highlighted in the following table, showing the projected need for older persons' accommodation, including specialist accommodation (such as Extra Care housing), included as Figure 5.15, paragraph 5.50, of the 2014 SHMA.

Table 5: Projected Need for Older Persons' Accommodation by Tenure

Projected Need for Older Persons' Accommodation (Including Specialist Housing) by Broad Tenure (2013-30)			
	Market	Affordable	Total
Need	1,148	618	1,766
(Supply)	(104)	(431)	(535)
Net Need	1,044	187	1,231

(Source: derived from demographic projections)

11.2 Provision of Bungalows / Properties Suitable for Older Persons

The following paragraph and associated table are quoted from Carlisle's Strategic Housing Market Assessment (SHMA) Update (September 2014):-

Our experience when carrying out stakeholder work as part of other SHMA commissions typically identifies a demand for bungalows. Where developments including bungalows are found it is clear that these are very popular to older people downsizing. It should be acknowledged that providing significant numbers of bungalows involves cost implications for the developer given the typical plot size compared to floor space – however providing an element of bungalows should be given strong consideration on appropriate sites, allowing older households to downsize while freeing up family accommodation for younger households (paragraph 5.50).

It is essential that we begin to address the changing demographic around the ageing population (identified in POPPI data and SHMA evidence) through the planning system, by delivering a greater number of accessible properties, suitable for older persons. Developing increased numbers of accessible homes for older and disabled people is fundamental to future-proofing Carlisle's housing market, creating a long-term positive social investment, as well as freeing up family homes for younger people. This approach is supported by Local Plan Policy HO 1 – Housing Strategy and Delivery, which establishes the principle of: “provid(ing) housing to meet a broad range of needs” (paragraph 5.8).

It is therefore recommended that applicants provide an element of bungalows, or other property types suitable for older persons, designed to flexible and adaptable standards (see Section 13 Residential Design Standards). Other types of suitable accommodation include:-

- Adaptable ground floor apartments;
- Adaptable upper floor apartments, which are serviced by a lift;
- Dormer bungalows, incorporating a ground floor w/c and washing facilities that can easily be converted to a wet room.

It is recognised that on some schemes, such as conversions of existing buildings or town centre apartment schemes, bungalows would not be practical or appropriate.

The benefits are also acknowledged of developing properties with level access front doors, and stair cases (minimum 900 mm wide) capable of accommodating stair lifts. These property types can enable people to remain in their homes as they get older, where people do not wish to move – especially if they have a support network in the area.

It is appreciated that bungalows require a larger footprint, as acknowledged in the text quoted from the SHMA (above), which can raise viability issues, especially on smaller sites. This issue is discussed in greater detail in Section 11.3. The recommended proportion of bungalows (or other suitable adaptable dwellings) in the table below is therefore based on a sliding scale, taking into account economies of scale around the size of the development site.

Table 6: Provision of Bungalows / Other Adaptable Accommodation

No. of Units on Development Site	Recommended Percentage of Bungalows, or other suitable adaptable property types
Fewer than 50	Applicants are encouraged to provide an element of bungalows or other housing suitable for older persons
50 – 99	5%
100 or more	10%

The requirement to provide bungalows, or other suitable adaptable properties meeting the needs of the ageing population, relates to both market and affordable housing. The proportion of affordable properties suitable for older persons should broadly reflect the targets set for each Affordable Housing Zone, in Local Plan Policy HO 4. For example:-

Example 1: 150 unit scheme in Affordable Housing Zone B: $x 10\% = 15$ dwellings suitable for older persons / $15 \text{ units} \times 20\%$ (affordable housing target) = 3 affordable / 12 open market;

Example 2: 80 unit scheme in Affordable Housing Zone A: $x 5\% = 4$ dwellings suitable for older persons / $4 \text{ units} \times 30\%$ (affordable housing target) = 1 affordable / 3 open market (rounded to the nearest whole unit).

The above guidance can be applied flexibly - for instance if the affordable older persons' units were provided as pairs of semi-detached bungalows it would be practical to include 4 of the 15 older persons' units as affordable in example 1, and 2 of the 4 older persons' units as affordable in example 2. Early dialogue is recommended.

11.3 Bungalows and Viability

The following text, relating to viability implications in respect of developing bungalows, has been provided by Lambert Smith Hampton, who provide planning viability consultancy services to a number of Local Authorities in Cumbria, as part of their economic viability review for the Council:-

Whilst bungalows are relatively 'land hungry', requiring a larger plot of land to deliver a similar floor area as a house of two or more storeys, they will also generally achieve greater values with values recently evidenced in the region of 25% higher on new developments in Carlisle compared to houses of similar floor area. It is considered that any marginal negative effect of viability arising from the requirement for bungalows on schemes of 50 or more units will be factored into site value negotiations.

Furthermore, on sites of this size there is scope to 'design out' any potentially negative viability effect, for example through slightly reducing average garden sizes or varying the size and shape of areas of public open space. In the round it is felt that a requirement to provide 5% of units as bungalows on a 50 unit sites (equating to three bungalows) and 10% of units as bungalows on 100 unit sites (10 bungalows) is not particularly challenging in viability terms.

It should also be pointed out that a number market housing schemes in recent years have viably delivered a greater percentage of bungalows than this stipulation.

11.4 Extra Care Housing

Extra Care Housing (sometimes also referred to as ‘very sheltered housing’ or ‘assisted living’) is accommodation designed with the needs of frailer older people in mind. Whilst they are primarily for older people some schemes may support younger people with disabilities. Extra Care schemes enable (mostly) older people to self-care and continue to live independently (with their own front door, kitchen, bedroom, and bathroom) but with varying levels of care and support available on site (24 hours a day/ 7 days a week) tailored to meet their individual requirements. There are also community facilities and activities available.

The ‘Extra’ in Extra Care is generally recognised to relate to care services that can:-

- Respond quickly to residents’ changing needs;
- Provide unplanned care as and when required, in addition to planned care;
- Provide an emergency response.

Extra Care housing can enable couples to remain living together, even with different levels of support needs, in a supportive environment at the heart of the local community. In some situations, Extra Care can even allow people to move out of residential care and return to independent living. A link is provided at the end of this document to Cumbria County Council’s Extra Care Housing and Supported Living in Cumbria Web page.¹³

In some circumstances, this can include dementia sufferers, although Extra Care may not be the most appropriate form of housing for people entering the scheme with dementia in its advanced stages. Extra Care schemes should be located in sustainable locations, in close proximity to local services and public transport.

Cumbria County Council’s Extra Care Housing and Supported Living Strategy (2016-25) projects a shortfall of 389 Extra Care housing units by 2025 when comparing current supply against estimated demand. Extra care properties can be for market sale, intermediate housing (usually shared ownership), or social / affordable rent - Heysham Gardens at Belle Vue is an example of a mixed tenure Extra Care scheme.

On larger applications, the Council would be amenable to accepting affordable Extra Care housing units (i.e. for social / affordable rent or intermediate housing) as part, or all, of the affordable housing requirement on the development. This could be as part of an affordable or mixed tenure Extra Care scheme. The Council would accept 50% social/ affordable rental and 50% intermediate housing, on the same basis as general needs affordable housing; however, schemes of mostly or all rental units would also be acceptable, where this is deemed more appropriate, e.g. for Housing Management purposes. It is accepted this has viability implications in respect of the larger discounts required on nil grant rental units.

The table below identifies a need for an additional 389 Extra Care units by 2025, across Carlisle’s urban and rural Housing Market Areas.

Table 7: Need for Additional Extra Care Housing to 2025

District HMA	Key Service Centre (KSC)	Towns/Villages included within the Area	Average Demand for ECH by 2025	Current ECH Supply (2017)	Average Shortfall for ECH by 202
Carlisle			550	161	389
Carlisle Rural East	Brampton, Longtown	Brampton, Stanwix rural, Great Corby & Geltsdale, Irthing, Hayton, Wetheral, Longtown & Rockcliffe, Lyne	152	38	114
Carlisle City	Carlisle	Belah, Belle Vue, Botcherby, Castle, Currock, Denton Holme, Harraby, Morton, St Aidan's, Stanwix urban, Upperby, Yewdale	351	123	228
Carlisle Rural West	Dalston	Dalston, Burgh (Wetheral*)	47	0	47

Note: Rural West with regard to Wetheral – i.e. included in Rural East, but some of those people may be equally keen on a move to an Extra Care scheme in Dalston (adjoining ward)

(Source: Cumbria County Council's Adult Social Care team)

Additional information and context is provided in the Cumbria County Council's Extra Care Housing and Supported Living Strategy 2016-25.¹⁴

11.5 HAPPI Design Principles

The 'Housing our Ageing Population: Panel for Innovation' (HAPPI) is made up of representatives from the All Party Parliamentary Group on Housing and Care for Older People.

HAPPI principles are based on the following 10 key design criteria, based on delivering accessible homes to enable older people to maintain independent lives:-

- Space and flexibility
- Daylight in the home and in shared spaces
- Balconies and outdoor space
- Adaptability and 'care ready' design
- Positive use of circulation space
- Shared facilities and 'hubs'
- Plants, trees, and the natural environment
- Energy efficiency and sustainable design
- Storage for belongings
- External shared surfaces and 'home zones'.

The first HAPPI report was launched in 2009, with an update provided in 2012. A link is provided at the end of this document to the most recent update from June 2016: HAPPI 3 Making Retirement Living a Positive Choice.¹⁵

Applicants are encouraged to embrace HAPPI principles in respect of new housing for older people, including Extra Care housing.

12 Other Supported Specialist Accommodation

12.1 Examples of Specialist Housing

Carlisle City Council is supportive of the provision of specialist housing schemes, which provide accommodation to support particular groups of people, e.g.:-

- Physically disabled people (developed to adaptable and flexible design standards);
- People with learning disabilities;
- People affected by dementia;
- Ex Armed Forces Personnel (who can sometimes struggle to reintegrate into civilian life, after leaving an institutionalised lifestyle).

The Council will work with partners, including Cumbria County Council's Adult Social Care team, to help facilitate and enable specialist developments.

In accordance with the principles of Local Plan policy HO 10, the Council will consider provision of suitable supported or specialist housing as an alternative to some, or all, of the affordable housing provision required under policy HO 4, where the supported or specialist accommodation would be meeting a clearly identified need.

13 Residential Design Standards for Older Persons and Specialist Accommodation

13.1 Accessible and Adaptable Dwellings

Carlisle's Local Plan Policy HO 10 – Housing to Meet Specific Needs is committed to the development of flexible and adaptable homes to meet the needs of elderly, disabled or otherwise dependant persons. Requirements for accessible and adaptable dwellings and wheelchair user dwellings are set out in Categories 2 & 3 of Part M (Volume 1) of the Building Regulations:-

Access to and Use of Buildings – Volume 1 Dwellings

M4(1) Category 1: Visitable dwellings

M4(2) Category 2: Accessible and adaptable dwellings

M3(3) Category 3: Wheelchair user dwellings.¹⁶

Lifetime Homes standards have now been incorporated into Part M of the Building Regulations; however, applicants may still find the Lifetime Homes Design Guide a useful reference.¹⁷

In regard to accessibility further details can be found in BS 9266:2013 Design of accessible and adaptable general needs housing – code of practice.

13.2 Replacement for Code for Sustainable Homes.

Following a fundamental review of the technical housing standards the Government has withdrawn the Code for Sustainable Homes. Issues such as water efficiency, accessibility and thermal efficiency are subject to control under the Building Regulations 2010 (as amended) with the guidance for these issues being contained within Approved Document G (Sanitation, hot water safety and water efficiency) Approved Document L1a (conservation of fuel and power in dwellings) and Approved Document M (Access to and use of buildings).

13.3 Dementia-Friendly Housing

Dementia is one of the most serious health and care issues affecting society – NHS estimates in 2017 were that 676,000 people in England are affected by dementia at a cost of £23 billion a year. From the age of 65, the risk of developing dementia is roughly doubled every 5 years.

The Alzheimer's Society has produced a 'Dementia-friendly housing charter', providing informative guidance on a range of housing-related issues, relevant to people affected by dementia, which will be useful to applicants, including:-

- Location – the importance of familiarity
- Design – colour and layout
- Technology – alarms, sensors, and lights
- Accessibility – the importance of local amenities
- Signage – clarity and appropriateness
- Adaptability – as needs change.

A link to the Charter is included at the end of this document.¹⁸

14 Self-Build and Custom Build Housing/Community Led Development

14.1 Self-Build and Custom House Building

The Council is supportive of individuals or groups of individuals who wish to develop their own homes. Self-build housing can be market or affordable; individual or group build; and can be hands-on, self-commissioned, or self-finish.

The Housing and Planning Act (2016) provides the following definition:-

“Self-build and custom housebuilding” means the building or completion by –

- (a) Individuals;
- (b) Associations of individuals; or
- (c) Persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals.”

(Section 9 (1) (A2))

NaCSBA (National Custom and Self-Build Association) identifies the distinction between Self-Build & Custom housing as follows:-

- Self-build Housing: “... projects where someone directly organises the design and construction of their new home. This covers a wide range of projects. The most obvious example is a traditional ‘DIY self-build’ home, where the self-builder selects the design they want and then does much of the actual construction work themselves. But self-build also includes projects where the builder arranges for an architect/ contractor to build their home for them; and those projects that are delivered by kit home companies, where the self-builder still has to find the plot ... ”
- Custom Housebuilding: “... where you work with a specialist developer to help deliver your home.”

A link to the NaCSBA Website is provided at the end of this document.¹⁹

14.2 Carlisle City Council’s Self-Build Register

Carlisle City Council has set up a register of people interested in building their own home.²⁰ The Self-build and Custom Housebuilding Act (2015) places a duty on the Local Authority to have regard to the register when carrying out planning, housing, land disposal and regeneration functions.

14.3 Serviced Plots

The Housing and Planning Act (2016) places an additional duty on Local Planning Authorities (LPAs) to grant suitable permissions for development to deliver sufficient serviced plots to match the level of demand on their Self-build and Custom Build Register. A serviced plot of land has access to a public highway and connections for electricity, water and waste water.

Further guidance is provided by the Planning Advisory Service (PAS) in Planning for Self and Custom-Build Housing (June 2016).²¹

14.4 Community Led Development & Community Land Trusts

Self-build or Custom Housebuilding is sometimes carried out by community-led groups, such as Community Land Trusts (CLTs) – the definition below is taken from the National CLT Network Website.

“**Community Land Trusts (CLTs)** are a **legally defined** concept but they are not a legal format in themselves. Any prospective community land trust should choose a legal format which would enable them to meet the legal definition as legislated in the Housing & Regeneration Act 2008, Part 2, Chapter 1, Clause 79:

A Community Land Trust is a corporate body which:-

- 1) is established for the express purpose of furthering the social, economic and environmental interests of a local community by acquiring and managing land and other assets in order:-
 - to provide benefit to the local community
 - to ensure that the assets are not sold or developed except in a manner which the trust’s members think benefits the local community
- 2) is established under arrangements which are expressly designed to ensure that:-
 - any profits from its activities will be used to benefit the local community (otherwise than by being paid directly to members)
 - individuals who live or work in the specified area have the opportunity to become members of the trust (whether or not others can also become members)
 - the members of a trust control it.”

A link is provided at the end of this document to the National CLT Network Website.²²

The Council is supportive of, and will, where possible, assist with CLT development schemes. It is recognised that CLTs offer the potential to engage local communities, and incentivise the release of land at affordable prices, while encouraging people to make an investment in their neighbourhoods and villages.

Additional information on Community Led Housing models and funding opportunities is detailed in Appendix 7.

Appendices and Glossary

Appendix 1: Carlisle District Local Plan (2015-30) Policy HO 4 Affordable Housing

Policy HO 4 - Affordable Housing

In order to achieve mixed and inclusive neighbourhoods, affordable housing provision will be sought in the following circumstances:

1. within Zone A, all sites of six units and over will be required to provide 30% of the units as affordable housing;
2. within Zone B, all sites of 11 units or over will be required to provide 20% of the units as affordable housing; and
3. within Zone C, all sites of 11 units or over will be required to provide 30% of the units as affordable housing.

It will not be acceptable to sub-divide sites and purposely design a scheme to avoid making affordable housing contributions.

The tenure split of affordable housing to be provided should be 50% for social or affordable rent and 50% for intermediate housing. A lower proportion and/or different tenure split may be permitted where it can be clearly demonstrated by way of a financial appraisal that the development would not otherwise be financially viable or where the proposed mix better aligns with priority needs. Early dialogue with the Council on these matters is essential.

For sites of between six and ten units, the affordable housing contribution will be sought in the form of cash payments which will be commuted until after completion of units within the development. For sites of 11 units or over, the affordable housing should be provided on the application site unless off site provision, or a financial contribution of broadly equivalent value in lieu of on-site provision, can be robustly justified by local or site specific circumstances.

The opportunity to secure affordable extra care housing schemes as part of the wider affordable housing mix on development sites will be sought where it is considered to meet needs and the site is in an appropriate location.

Policy HO 4 will operate within the context of national policy and will be implemented with regard to any relevant future changes including to the national definition of affordable housing.



Appendix 2: Affordable Housing Statement

Applicants will be required to provide an Affordable Housing Statement with any planning application that needs to provide on-site affordable housing, in accordance with Policy **HO 4** 'Affordable Housing' of Carlisle's Local Plan. Please also refer to section 3.2 'Local Planning Policy' of this document.

The Council would strongly recommend that applicants engage in pre-application discussions with the Council's Housing Development Officer (or other members of the Local Plans team), to establish the size, type and tenure of the affordable housing required.

If the applicant feels they are unable to deliver the Council's affordable housing target (please refer to Policy HO 4 and Section 3.2 of this document in respect of the requirement for Affordable Housing Zones A, B & C), then applicants are required to submit an Economic Viability Assessment, following the guidelines set out in **Appendices 3 & 4**, in addition to the Affordable Housing Statement.

It is expected that the applicant will have held pre-application discussions with the Council's Development Control team to ensure the proposed development is acceptable in principle prior to undertaking an economic viability assessment. The Council currently provides pre-application advice as a free service.

The **Affordable Housing Statement** should clearly set out the following:-

1. Detail how the proposed development complies with national (NPPF & NPPG) and local (especially Local Plan policy HO 4 Affordable Housing) planning policies.
2. Provide a schedule of the overall number of residential properties proposed, including the mix of market and affordable units, and providing a breakdown of both market and affordable units by property type.
3. Estimated open market value for the affordable units (ideally provided by a local RICS qualified surveyor). This is because on some higher value schemes properties for some affordable tenures (e.g. discounted sale) may not be “affordable” to people on typical local incomes, even with a discount applied. In cases where an economic viability assessment has been provided valuations will also be required for the open market units – see Appendix 3.
4. A site layout plan, identifying the location and property types of the affordable units – different affordable housing tenures, such as social rent or discounted sale, should be made explicit on the plan (e.g. through colour coding). The layout plan, including the key, should be clearly legible when printed in A3. The plan should also detail car parking for each plot including the affordable units.
5. Clarification of the gross site area and net developable area.
6. The affordable properties should be fully integrated within the development, which should be “tenure blind” as far as possible, achieving mixed sustainable communities principles. It is acceptable to have clusters of social/ affordable rented properties for housing management purposes, although on larger schemes they should not be in just one location; however, low cost home ownership properties should be “pepper-potted” around the site as much as possible.
7. Details of the individual unit sizes for each of the affordable units – guidelines on minimum affordable unit sizes (based on gross internal floor space) are set out in Table 3 in Section 9.2 of this document.
8. Identification of the development standards for both the scheme and individual units need to be considered (guidance on Affordable Housing Design Standards is included in Section 9, and Residential Design Standards for Older Persons and Specialist Accommodation is covered in Section 13).

9. If the proposal is that the affordable units are delivered other than transferring any rental units to a Housing Association and selling the low cost home ownership units through the Council’s discounted sale register, details will be required of the arrangements for ensuring the properties remain affordable to successive occupiers.
10. The expectation set out in Local Plan policy HO 4 is that affordable housing will be delivered on the application site, unless it can be evidenced that this cannot be managed effectively on site or there would be other benefits (e.g. significantly widening housing choice and encouraging a better social mix) – please refer to paragraph 5.36 of Policy HO 4 for further detail. If the proposal is that the affordable housing would be delivered on an alternative site (which would usually need to be built before the application site), or via a commuted sum financial payment, this would need to be agreed with the Council’s Housing Development Officer or Planning Policy team, prior to submitting the details in the Affordable Housing Statement. This would not usually be considered acceptable.
11. Details of the preferred Housing Association partner involved in the development (where applicable).

The Council would reserve the right to invalidate the planning application, in cases where no Affordable Housing Statement has been provided, or the Statement contains insufficient supporting information. However, it is acknowledged that not all information may be available at Outline Planning stage (as detailed below).

Outline Planning Applications

It is accepted that not all of this information will always be available for Outline Planning Applications (especially in respect of the above points 2, 3, 4 & 7). In the case of Outline applications, it is recommended that a headline summary of the likely provision should be included, pertaining to these points, with the final detail then provided with the Reserved Matters application.

Appendix 3: Economic Viability Assessment Guidance (Lambert Smith Hampton)

Site specific viability assessments must be based on up to date locally sourced sales, build and development costs, as well as evidenced site specific costs. The text in this Appendix has been supplied by Lambert Smith Hampton ('LSH') as guidance to assist applicants. LSH provide planning viability consultancy services to a number of Local Authorities in Cumbria.

The text below is accompanied by a viability appraisal template (included as Appendix 4). This template comprises an updated version of a template previously developed by Cumbria Local Economic Partnership (LEP) Planning and Housing Task Group. It is recommended that this template will be used to provide a common basis for decision making within Carlisle District, where viability is an issue in the determination of a planning application.



What is viability?

Planning Practice Guidance (PPG) (2014, Viability, paragraph 16) provides the most concise definition:-

‘A site is viable if the value generated by its development exceeds the costs of developing it and also provides sufficient incentive for the land to come forward and the development to be undertaken.’

Royal Institution of Chartered Surveyors ('RICS') guidance (Financial Viability in Planning - RICS Guidance Note 1st Edition (GN 94/2012) (RICS, August 2012) provides a methodology framework and guiding principles for financial viability in the planning context. It defines ‘financial viability for planning purposes’ as being:-

‘An objective financial viability test of the ability of a development project to meet its costs including the cost of planning obligations, while ensuring an appropriate Site Value for the landowner and a market risk adjusted return to the Applicant delivering the project.’



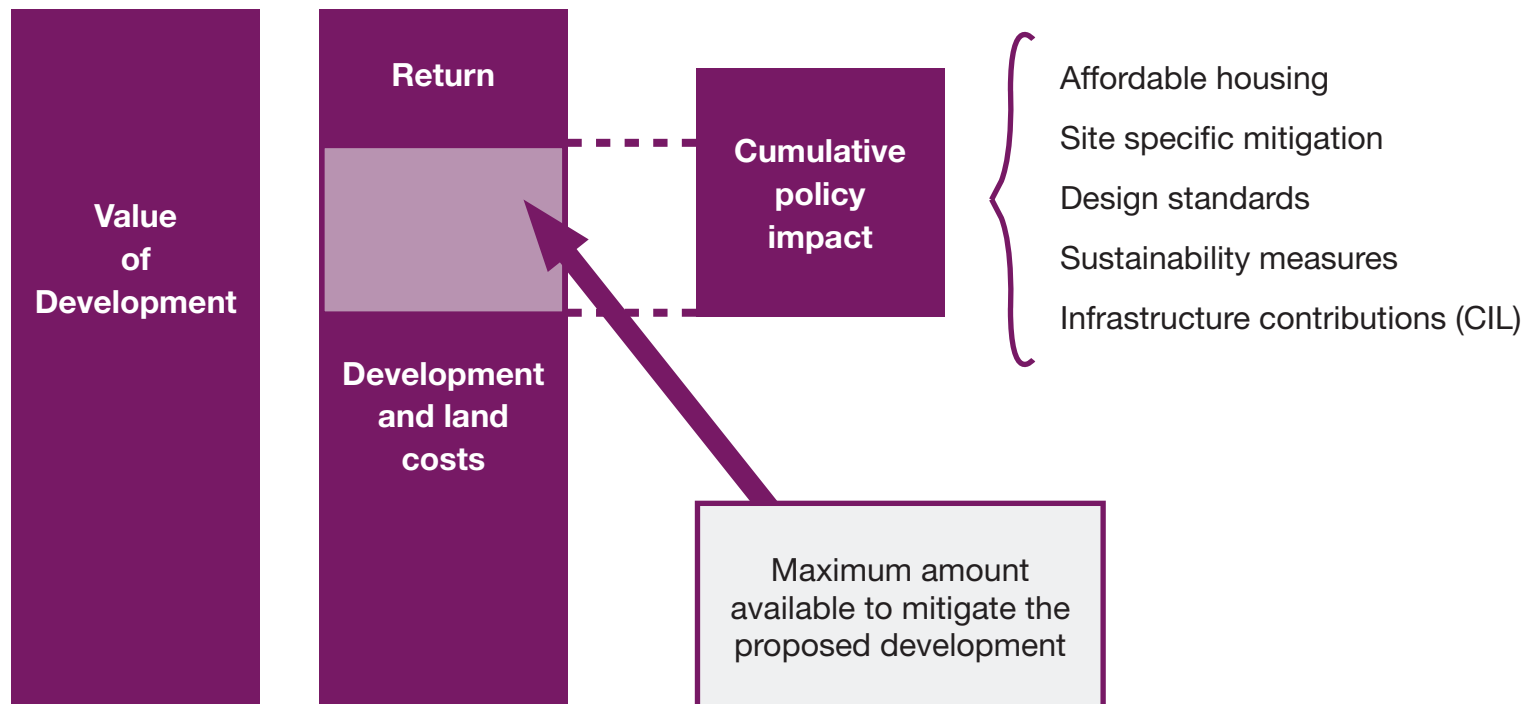
Another important source of guidance is Viability Testing in Local Plans – Advice for planning practitioners (LGA/HBF – Sir John Harman, June 2012) (known as the ‘Harman Guidance’), which provides practical advice for planning practitioners on developing viable local plans and viability testing states (at page 14) that:-

‘An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.’

The National Planning Policy Framework (‘NPPF’) says that plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened, as illustrated by the diagram below:

NPPF (paragraph 173) emphasises deliverability of development and the provision of competitive returns to willing land owners and developers to enable sustainable development to come forward:-

‘To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.’



Why is viability important?

To be financially viable, a development broadly needs to satisfy three main parties:-

1. Developer – providing a competitive return to a willing developer in consideration of the risks of development.
2. Landowner – providing a competitive return to a willing landowner to sell their land.
3. Local planning authority – in order to grant planning permission, including CIL and Section 106 requirements (typically in the form of on-site affordable housing contributions).

If one or more parties (landowner, developer or planning authority) are not satisfied, it is unlikely that the development or redevelopment in question will proceed.

Assessment of viability

A developer will generally produce a development appraisal in order to assess the residual value ('RV') of a potential scheme and compare this to a target value (also known as the 'residual valuation model'). Residual value will generally relate to either the site value (land price) or the level of developer return (profit). If the RV is above the target value, in the context of a set of reasonable and realistic development assumptions, then the scheme is considered to be viable. If the RV is close to or slightly below the target value then the scheme is likely to be of marginal viability. If the RV is significantly below the target value the scheme will be considered to be unviable and one or more costs of the scheme (land value, planning contributions development costs or profit) will need to be reduced in order for the scheme to proceed. In such instances the Applicant may decide to submit viability evidence to the LPA in an attempt to justify deviation from the headline planning policy position in respect of the provision of on-site affordable housing and / or other planning contributions.

The 'RICS Guidance' note advocates the use of the development appraisal / residual valuation model in such situations:-

'In assessing the impact of planning obligations on the viability of the development process, it is accepted practice that a residual valuation model is most often used. This approach uses various inputs to establish a (Gross Development Value) GDV from which (Gross Development Cost) GDC is deducted. GDC can include a Site Value as a fixed figure resulting in the developer's residual profit (return) becoming the output, which is then considered against a benchmark to assess viability. Alternatively, the developer's return (profit) is an adopted input to GDC, leaving a residual land value as the output from which to benchmark viability, i.e. being greater or less than what would be considered an acceptable Site Value.'

The diagrams below show the key elements in a development appraisal / residual valuation model:-

Residual Value approach with land value as output:

Gross Development Value

(The combined value of the complete development)

LESS

Gross Development Cost

(Cost of creating the asset, including a profit margin)

(i.e. Construction + fees + finance charges + profit)

= RESIDUAL LAND VALUE

(which is then compared with acceptable competitive return
for willing landowner)

Residual Value approach with developer profit as output:

Gross Development Value

(The combined value of the complete development)

LESS

Gross Development Cost

(Cost of creating the asset, including purchase of land)

(i.e. Land + Construction + fees + finance charges)

= RESIDUAL PROFIT (RETURN)

(which is then compared with acceptable competitive return
for willing developer)

Commentary is provided below on each expected variable element within a development appraisal (Applicant viability submission) in the context of LSH's ongoing experience of the local housing sector.

GDV – Market Units

For viability assessment purposes it is important to realistically model the effective sales value (i.e. the capital contribution to the scheme) of any market units within a scheme. Applicants should provide realistic market values for proposed units. This should ideally be expressed as market value figures for each unit, with accompanying floor areas and figures being expressed on a £ per m² / ft² basis. Anticipated sales values should be based on the developer's professional knowledge, if necessary with a supporting valuation report from a Chartered Valuation Surveyor. The viability audit process will be assisted by the provision of comparable valuation evidence by Applicants.

Market values seen across Carlisle District are diverse. Higher value settlements such as Cumwhinton, Brampton and Dalston will often generate market values of between 30% and 40% above those seen in parts of urban Carlisle.

This disparity in market values between different locations within the District is illustrated by the table below, which looks at sales values achieved for the same Story Homes house types across their current schemes:

Address	Taunton house type	Warwick house type	Durham house type	Guildford house type
Edenholme Park, Cumwhinton	£355,950*	£324,950*	N/A	N/A
The Grange, Dalston	£347,950	N/A	£286,075	£203,839
Eden Gate, Houghton	£326,617	£300,458	N/A	N/A
Crindledyke Farm, Kingstown	N/A	£289,950*	N/A	£200,593
The Ridings, Blackwell	£284,950	£263,950	£245,838	£186,760

- Taunton House type – circa 151m² – 4 bedroom detached with integral single garage
- Warwick house type – circa 130m² – 4 bedroom detached with integral single garage
- Durham house type – circa 121m² – 4 bedroom detached with integral garage
- Guildford house type – circa 108m² – 3 storey, 3 bedroom semi-detached, or terraced with detached garage, driveway parking or parking court
- Note – Sales prices analysed are from period 01/01/2016 to 31/03/2017, with exception for Edenholme Park and 'The Warwick' at Crindledyke Farm where asking prices are shown.

The Zoopla website compiles a 'zed-index' which is the average property value in a given area based on current Zoopla estimates, which in turn are based on a range of information including sales data, asking prices, regional price trends. Zoopla estimates provide a useful starting point when reviewing the current price differentials between different areas, although any assumptions must be considered in the context of the respective nature of the generic housing stock of each area (i.e. a predominance of small terraced houses will reduce average recorded sale prices).

The table below shows current 'zed-index' figures for each postcode sub-area within Carlisle District.

Postcode sub-area	'zed-index' figure	Settlements in area	Value change in 12 months to June 2017
CA1	£127,571	Carlisle Urban area (east, including Carleton)	+ 2.42%
CA2	£125,066	Carlisle Urban area (south-west, including Durdar, Belle Vue and Denton)	+ 3.21%
CA3	£179,637	Carlisle Urban area (north, including Houghton (part) and Stanwix)	+ 3.42%
CA4	£263,481	Warwick Bridge, Wetheral, Cumwhinton, Scotby and Armathwaite (note this area includes a small part of Eden District)	+ 4.68%
CA5	£256,850	Dalston and Burgh-by-Sands (note this area includes part of Allerdale Borough)	+ 4.05%
CA6	£213,329	Longtown, Bewcastle, Cargo, Roadhead, Rockcliffe and Houghton (part)	+ 4.09%
CA8	£219,851	Brampton, Gilsland, Greenhead & Slaggyford (note this area includes a part of Northumberland)	+ 4.19%

For reference, set out below is a summary of sales values of open market units achieved on seven ongoing and recently completed housing developments within the District for the period from 1 January 2016 to 31 March 2017.

Address	Ave floor area (m2)	Number of market sales in period	Ave sale price per unit	Ave £ per m2	Ave £ per ft2
Thornedge, Cumwhinton – Bungalow units only (Magnus Homes)	137	5	£363,418	£2,657	£247
Eden Gate, Houghton (Story Homes)	126	35	£280,067	£2,228	£207
The Grange, Dalston (Story Homes)	110	42	£233,544	£2,117	£197
Thornedge, Cumwhinton – House Units only (Magnus Homes)	99	3	£208,833	£2,117	£197
The Ridings, Blackwell (Story Homes)	111	28	£207,489	£1,872	£174
Carleton Farm ('Speckled Wood') (Persimmon Homes)	88	14	£181,263	£2,055	£191
The Oaks, Longtown – All bungalow units (Oakmere Homes)	63	9	£136,950	£2,182	£203
Former Border Terrier, Morton (Irving Builders)	67	4	£112,000	£1,672	£155

Applicants should avoid designing unnecessarily large dwellings, thereby making sites extremely low density (which could potentially be motivated by an attempt to side-step the requirement to provide affordable housing). There is a maximum/optimum price that a purchaser would be prepared to pay for a property in a particular area, and this should be reflected in the scheme layout/design.

GDV – Affordable Units (Intermediate and Affordable/Social Rent Homes)

For viability assessment purposes it is important to realistically model the effective sales value (i.e. the capital contribution to the scheme) of any elements of affordable housing within a scheme. Where possible any value assumptions should be able to be evidenced by an offer in writing made by a Registered Provider ('RP').

Rental affordable housing tenures (refer to section 2.2 for additional detail) will typically comprise one of the following:-

- **Social Rent**

Any such units arising from privately developed residential schemes will generally be purchased from a developer upon completion of construction by an RP. At the time of writing such RP transfers of such properties typically take place at between 40% and 50% of full market value, dependent upon the exact nature and location of the properties concerned.

- **Affordable Rent**

Any such units arising from privately developed residential schemes will again generally be transferred upon completion of construction to an RP. At the time of writing such RP transfers of such properties typically take place at between 40% and 50% of full market value, dependent upon the exact nature and location of the properties concerned. In Carlisle District there is relatively little difference between social and affordable rents.

'Intermediate' affordable housing tenures (refer to section 2.3 for additional detail) will typically comprise one of the following:-

- **Discounted Sale**

Carlisle City Council's Low Cost Home Ownership Policy requires a 30% discount on new developments (i.e. these properties are sold to first time and subsequent purchasers at 70% of full market value).

- **Shared ownership / shared equity**

Typically such properties will be purchased from a developer upon completion of construction by a RP (Housing Association). At the time of writing such RP transfers of such properties typically take place at between 50% and 65% of full market value, dependent upon the exact nature and location of the properties concerned.

- **Starter Homes**

A potentially emerging affordable product, on which Government regulations are awaited at the time of writing. It is envisaged that these properties will be sold to first time purchasers at 80% of full market value.

Land Value (Competitive return to a willing landowner)

What can be considered to be a reasonable landowner return will depend upon the specific circumstances of the case, for example whether a site is greenfield or brownfield in nature, the extent of abnormal costs, current and future uses of the land. Clearly if a landowner does not receive close to what they perceive to be a reasonable return in relation to the sale of their land then it will not be made available for development.

The Threshold Land Value ('TLV') is a viability concept relating to a land value at or above that which it is assumed a landowner would be prepared to sell.

The Residual Land Value ('RLV') is the amount remaining to buy the land once the total cost of a development and an appropriate profit are deducted from the gross development value. The RLV must be above or close to the TLV in order for a scheme to be considered to be potentially viable.

Typically a landowner will have a preconceived notion of the value or worth of their site. In the case of greenfield sites (typically in an existing agricultural use) it is relatively simple to reconcile whether this notion is realistic through the benchmarking of greenfield land values against other relevant transactions. The benchmarking of land value for brownfield sites is much more subjective, depending on such factors as the existing and previous use of the property or site in question, the extent of abnormal or remediation costs required to facilitate an alternative use for the site and lost income from the termination of existing investments on the site and the perceived historic investment in the site or building by the landowner.

The 'RICS Guidance' states that 'site value' as a (landowner) benchmark should: 'equate to the market value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan.'

Land values seen across the District in recent years are diverse. The table below details recent transactional evidence for residential development sites and has been obtained from HM Land Registry (and is therefore in the public domain):

Name of site	Purchase date	Price	Approx. net acres	Price per net acre	Comment
Thornedge / Highcroft (and Lyndhurst), Cumwhinton (Magnus Homes)	May 2017 Oct 2015 July 2014	£888,000	4.56	£194,737	35 units Brownfield / Greenfield / within village – including purchase and demolition of existing house to gain access to site and demolition of former equestrian buildings. Total assumed purchase price reduced by £50k to reflect simultaneous purchase of additional land to be used for equestrian purposes outside of area of subject scheme.
Carleton Clinic, Cumwhinton Rd, Carlisle (Taylor Wimpey)	May 2016	£2,991,451	14.13	£211,643	189 units Greenfield / urban edge
The Ridings, Durdar Rd, Blackwell (Phases 1 and 2 only) (Story Homes)	Jan 2016 Feb 2015 Mar 2014	£2,178,451	8.85	£246,046	108 units (from a total for overall scheme of 318). Greenfield / urban edge
The Grange, Townhead Rd, Dalston (Story Homes)	Jan 2016	£1,510,000	10.06	£299,289	121 units Greenfield / village
Caxton Road, Newtown, Carlisle (Prospect Estates)	May 2015	£225,000	3.63	£62,035	63 units outline consent Brownfield – demolition and re-development of existing industrial buildings
Eden Gate (Hadrian's Camp), Houghton (Story Homes)	Feb 2015	£1,540,000	9.41	£163,656	99 units Brownfield / urban edge
Former Border Terrier Public House, Morton (Irving Builders)	Sept 2014	£250,000	0.84	£297,619	23 units Brownfield urban infill – demolition and re-development of site of existing public house

Name of site	Purchase date	Price	Approx. net acres	Price per net acre	Comment
Land adj to St Augustine's Church, Waverley Gardens, Carlisle (McCarthy and Stone)	Sept 2013	£600,000	1.16	£516,621	42 retirement living units Brownfield / Greenfield urban infill – demolition and re-development of site of existing social club and adjoining amenity space
Former Botcherby Dairy, Holywell Crescent, Carlisle (Top Notch Construction)	Sept 2011	£500,000	3.73	£134,002	66 units Brownfield – demolition and re-development of redundant dairy site
Linton Grove, London Road, Carlisle (Persimmon Homes)	Mar 2008	£3,500,000	6.37	£549,494	98 units Brownfield – demolition and re-development of existing storage yard and depot

In the context of the above evidence, adopted local and national planning policy and LSH's ongoing local knowledge and experience of Carlisle District and the wider Cumbrian residential land market, it is considered that a benchmark greenfield land value of between £150,000 and £300,000/net developable acre is appropriate for sites (without any significant abnormal costs) within the District at the present time.

With respect to site-specific viability audits, where required, the appropriate land value attributable to each case will be considered on its own merits in the context of relevant factors and circumstances.

Development costs

Component costs and typical methods of calculation:

- **Basic build costs**

These are direct costs relating to the creation of each proposed dwelling unit, including preliminaries, cost of creating substructure and superstructure, but excluding abnormal items. They do not include the costs of any external works beyond the footprint of the walls of each dwelling.

A useful starting point for the calculation of basic build costs for new build schemes is RICS's BCIS ('Building Cost Information Service') – the UK property market's leading provider of construction cost and price information. Adopted BCIS costs should be location adjusted to the District and LSH would generally advocate the use of median data for small sites. BCIS costs are based on Gross Internal Area ('GIA'). For residential schemes BCIS 'Average Prices' data arises from the analysis of sample cost returns from a range of schemes, including wholly affordable housing schemes (which will typically have greater relative costs than private residential schemes), of varying design. Although of use, BCIS data should always be 'sense checked' against an Applicant's own internal figures – which are typically built up from actual costs arising from previous local comparable projects and / or costed specifically by quantity surveyors. When preparing or auditing site specific viability assessments LSH's opinion of appropriate build costs will always be considered within the context of data held of recent representative build costs from within the local area. At the time of writing, there has been a significant increase in BCIS costs over the past 12 to 18 months. This increase has been greater than the rate of increase seen in representative local build costs. Typically, LSH are now finding that local build costs fall between BCIS lower quartile and median index figures for 'housing, mixed developments', with medium and larger sized sites at the lower end of this range. BCIS costs will typically include main contractor profit (circa 10%). With 'main contractors' often being a subsidiary part of an Applicant (developer) company it is debateable whether it is appropriate to assume a main contractor profit in conjunction with a developer profit (i.e. in this scenario the total assumed profit could be as high as 30%).

Whilst BCIS figures are also available for conversion schemes LSH have found that the sample data on which these figures are based is typically small and from a diverse range of projects to make the resultant cost data of particular use. LSH would advocate the use of a quantity surveyor / cost consultant for conversion schemes and for particularly complex or high density schemes.

With respect to site-specific viability audits, where required, the appropriate level of build costs for each case will be considered on its own merits in the context of relevant factors and circumstances.

- **Infrastructure and External Costs**

These are the costs of any external works beyond the footprint of the walls of each dwelling. These include the cost of 'non-abnormal' external works within the curtilage of each plot and within the communal areas of the site such as the installation of utilities, drainage, highways infrastructure and site landscaping. Many of these items will depend on individual site circumstances and can only properly be estimated following a detailed assessment of each site. It is however possible to generalise. External costs are typically lower for higher density than for lower density schemes as higher density schemes will have a smaller area of external works, and services can be used more efficiently. Large greenfield sites are more likely to require substantial expenditure on bringing mains services to the site. Typically LSH would expect to see external costs comprising from around 10% of basic build costs for smaller sites (up to 0.5 hectares) and increasing to 20% of basic build costs for larger greenfield schemes (of 1.5 hectares and above). Any deviation from this assumed range will need to be specifically evidenced by the Applicant.

- **Site-specific abnormal costs**

Abnormal costs should be those specific to the site, which are over and above costs that can reasonably be expected to be incurred for the development of an allocated, level and well-drained greenfield site with adopted highways and utilities available to the site boundary. When auditing Applicant viability submissions the LPA will require that site-specific abnormal costs are separated from non-site-specific external costs. This is important as significant abnormal costs are likely to have a bearing on land value.

Such costs are typically provided on behalf of an Applicant by a quantity surveyor / cost consultant or engineer. Applicants will need to provide evidence and justification for abnormal costs within viability submissions to the LPA.

Examples of typical site-specific abnormal costs are set out below:-

- Re-contouring, construction of retaining walls and importation of topsoil to achieve and maintain appropriate levels for development platforms and vehicular access road due to significant sloping and undulating nature of a site.
- The use of more expensive methods of construction (e.g. piled foundations) as a result of identified ground conditions.
- Demolition of existing structures on a site in order to facilitate development.
- Removal to a licensed landfill site or appropriate treatment of contaminated topsoil or identified alien materials.
- The need to relocate existing services crossing a site.
- The geology of a site necessitating the breaking out of rock for drains and sewers.
- Site-specific flood mitigation measures.

When carrying out audits of Applicant viability submissions LPAs may appoint a specialist to independently cost submitted abnormal cost items in situations where it is felt that such costs could be excessive or unnecessary.

- **Contingency**

A contingency allowance will typically range between 2% and 5% of total build costs for new build schemes. For previously undeveloped and otherwise straightforward sites LSH would normally allow a contingency of around 2.5% with a higher figure of 5% on more risky types of development and previously developed land. Contingency figures in the range of 5 to 7.5% may be appropriately adopted for conversions of more challenging buildings – where it is more likely that unexpected costs could be encountered as a scheme progresses on site. Where costs have been more accurately calculated, for example by a quantity surveyor or engineer or in the context of particularly extensive site investigative works, there may be a case to reduce contingency.

Professional Fees

Professional fees for schemes within the local area (including statutory fees) will typically fall into the range of 5% to 10% of construction costs, dependent upon scale and nature of scheme. Sites requiring input from wider range of professionals (e.g. brownfield, flood-affected and more complicated sites) are likely to be at the higher end of this range.

Some Applicants will utilise the professional services of their own employees, whilst others will utilise external consultants. Costs arising from either scenario should fall into ‘professional fees’. Volume housebuilders will be able to reduce professional fees to an extent through the use of a suite of standard house types across a number of schemes, negating the need for the specific re-design of every unit on each scheme.

Developer contributions (s106)

Each scheme should be considered on its own merits, dependent on the specific need for off-site mitigation, as reasonably justified by the LPA. Typical developer cost contributions provided through s106 agreements relate to education, off-site public open and community space provision and off-site highways.

Marketing and disposal costs

Marketing and disposal costs include sales legal fees, sales promotion and agency, marketing budget and sales incentives (where necessary). Typically these cumulative costs are expected to fall within the range of 1.5% and 3% of GDV. Some developers prefer to deal with marketing in-house, whilst others will utilise the services of a local estate agent. Whichever model is adopted the resultant costs will fall under this heading. Larger housing developments are likely to require a staffed show-house. Small schemes may require little promotion beyond a roadside sales board and a presence on an online property sales portal.

In the context of the significant local housing need for affordable discounted sale units LSH would expect to see the marketing and sales allowance for such units reduced to 1% (comprising legal fees and basic agency only). It is anticipated that affordable and social rent units will be transferred directly to an RP, therefore a lower allowance of 0.5% (comprising legal fees only) should be adopted for such units.

Site Acquisition Costs

Site acquisition costs will typically be covered within a budget of 1.5% of site value and will incorporate acquisition agents and legal fees. In addition to this allowance SDLT (Stamp Duty Land Tax) should be accounted for at the prevailing rate for the scheme in question. Link to the most recent SLDT rates:

<https://www.gov.uk/stamp-duty-land-tax/overview>

Development Finance Costs

Finance costs within a development appraisal are usually based on the accumulated debt, ideally calculated using a cash flow model in the context of the application of appropriate timescales for the scheme in question. At present most mainstream developers can obtain finance in the range of 4 to 5% per annum with a credit facility or up to around 60% loan to value. When the arrangement costs of obtaining finance are taken into account the total cost of finance will typically fall within the range of 6% to 7% per annum.

It is appreciated that the business models of some developers will involve investing more of their own funds into schemes, with other developers requiring greater external funding. The 'RICS Guidance' note (detailed below) is very clear on how such matters must be dealt with:-

‘... viability appraisals... should disregard either benefits or disbenefits that are unique to the applicant, whether landowner, developer or both; for example, internal financing arrangements. The aim should be to reflect industry benchmarks as applied to the particular site in question for a planning application Clearly, there must be consistency in viability principles and application across these interrelated planning matters.’

Consequently, for consistency, the assumption is advocated that finance will fall within the range of 6% to 7% per annum of accumulated debt; assuming a requirement for 100% debt funding. Any scenario that differs from this will need to be specifically justified by an Applicant.

Sales rates and development timescales

Sales rates of between 1.5 and 3 units per month are typical at the present time across Carlisle District dependent upon the nature and location of scheme and subject to the appropriate initial pricing of units by the developer. By way of local current examples, Story Homes had four active residential sites within the District during 2016. The table below sets out total number of sales achieved during this period with average number of sales per month.

Address	Total number of sales (2016)	Ave number of sales per month
The Grange, Dalston	38	3.17
Eden Gate, Houghton	35	2.92
The Ridings, Blackwell	30	2.5
Crindledyke Farm, Kingstown	29	2.42

In general terms, it would be typical to expect each dwelling on a scheme to be built on average over a six month period. LSH would typically anticipate a two to three month pre-construction enabling / mobilisation period following site purchase and a six month period from commencement of construction to first sale. Flatted schemes will be assessed on their own merits, as clearly it can be impractical for such units to be sold and occupied until the block they sit within has been completed in full.

Any significant deviation from these starting assumptions will need to be justified by the Applicant.

Developer Return (Profit) (Competitive return to a willing developer)

There has been much debate at appeal and through assessment of Local Authority policy and guidance documents of what might be considered a competitive and appropriate developer return. The following points are useful to refer to in this regard:-

- The Planning Advisory Service 'Viability Handbook and Exercises' (para 4.80) (January 2011) advises that:-

Where a positive residual land value is achieved...Typical required margins, depending on the developer and the risks of the development, are a 20% margin on cost and 17.5% margin on GDV.

- The accompanying guidance to the HCA's (now Homes England) Development Appraisal tool comments as follows on Developer's Return for Risk and Profit (including developer's overheads):-

Open Market Housing

The developer 'profit' (before taxation) on the open market housing as a percentage of the value of the open market housing. A typical figure currently may be in the region of 17.5-20% and overheads being deducted, but this is only a guide as it will depend on the state of the market and the size and complexity of the scheme.

Affordable Housing

The developer 'profit' (before taxation) on the affordable housing as a percentage of the value of the affordable housing (excluding SHG). A typical figure may be in the region of 6% (the profit is less than that for the open market element of the scheme, as risks are reduced), but this is only a guide.

- Lambert Smith Hampton provided expert witness services in relation to a key appeal decision in relation to a large urban edge housing scheme in Kendal in 2013. The following extract, taken from the Appeal Decision, sets out the Inspector's conclusion as to developer return:-

The concept of a 'competitive return' is not further defined by the NPPF, and could be the subject of differing interpretations by the parties involved in any particular development. The assessment of a competitive return will involve an element of judgement. Clearly, however, excessively ambitious predictions must be tempered by comparison with industry norms and local circumstances. In this case, it is common ground that a competitive return for the developer can be taken as a profit of 18-20% of the gross development value ('GDV')...I see no reason to reach a different conclusion.

It is important to acknowledge that the returns sought by different developers and how they secure this through the whole development process can vary considerably. Developers will take into account a range of factors relating to the risk profile of the scheme, such as scheme size, time of delivery, location and other market factors, in determining what an acceptable rate of return is. Developer's Return is often the most potentially contentious aspect of any Viability Assessment.

From experience LSH are aware that widely differing profit margins will be expected by different Developers within the Cumbria area. Some smaller developers may be willing to accept profit levels of between 8 and 15% of GDV (net of central overheads) in order to keep their workforce employed. Such smaller developers will generally have low level or no funding requirements and the policies of lenders will have minimal relevance.

Other Developers have greater profit expectations of anything from 15% and 20% of GDV. Developers falling into this bracket will generally utilise bank funding facilities and therefore the current risk-averse cautious policies of lenders will have a greater effect. In general terms ongoing reduced sales rates across the UK continue to cause lenders some concern.

In relation to the current situation in Carlisle District it is LSH's view that a minimum assumption of 15% of GDV is appropriate on smaller schemes of up to 10 units (affordable housing contributions would apply on sites of 6 to 10 units in Affordable Housing Zone A), increased to 18% for schemes of 11 or more units. It should be noted that these assumed target rates of return are inclusive of central overhead costs.

Whilst many funders do expect 20% of GDV as a starting point on medium and large schemes, there is typically scope for a developer with a reasonable track record to agree a reduction to 18% of GDV where viability becomes an issue and all three parties to transaction (the landowner, developer, LPA) will each need to potentially compromise expectations to some extent, in order to broker a mutually acceptable solution.

Appendix 4: Economic Viability Assessment Template

Housing Viability Model:			Bespoke pro-forma viability appraisal template													
Brief Description																
Location:	[Site Location]												Date		Work in Progress	
Typology:	FEATURING	40	UNIT development												Status: Draft	
		30	OPEN MARKET UNITS												Private & Confidential	
		10	AFFORDABLE UNITS	Subject to tenure assumptions, policy requirements and viability for affordable housing												
Gross Development Value																
Plot Number 1	2 Bed	For sale		70	m2		98,000	Affordable	Source: Discounted Sale Affordable Unit @ 70% of MV						£1,400	per m2
Plot Number 2	2 Bed	For rent		70	m2		70,000	Affordable	Source: Recent negotiated contracts with RPs						£1,000	per m2
Plot Number 1	2 Bed	For sale		70	m2		98,000	Affordable	Source: Discounted Sale Affordable Unit @ 70% of MV						£1,400	per m2
Plot Number 4	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 5	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 6	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 7	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 8	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 9	2 Bed flat	For rent		60	m2		60,000	Affordable	Source: Recent negotiated contracts with RPs						£1,000	per m2
Plot Number 10	2 Bed flat	For rent		60	m2		60,000	Affordable	Source: Recent negotiated contracts with RPs						£1,000	per m2
Plot Number 11	2 Bed flat	For rent		60	m2		60,000	Affordable	Source: Recent negotiated contracts with RPs						£1,000	per m2
Plot Number 12	2 Bed flat	For rent		60	m2		60,000	Affordable	Source: Recent negotiated contracts with RPs						£1,000	per m2
Plot Number 13	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 14	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 15	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 16	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 17	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 18	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 19	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 20	2 Bed	For sale		75	m2		150,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 21	3 Bed	For sale		100	m2		200,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 22	3 Bed	For sale		100	m2		200,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 23	3 Bed	For sale		100	m2		200,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 24	3 Bed	For sale		90	m2		180,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 25	3 Bed	For sale		90	m2		180,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 26	3 Bed	For sale		90	m2		180,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 27	3 Bed	For sale		90	m2		180,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 28	3 Bed	For sale		90	m2		180,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 29	3 Bed	For sale		100	m2		200,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 30	3 Bed	For sale		100	m2		200,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 31	3 Bed	For sale		100	m2		200,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 32	3 Bed	For sale		90	m2		126,000	Affordable	Source: Discounted Sale Affordable Unit @ 70% of MV						£1,400	per m2
Plot Number 33	3 Bed	For sale		90	m2		126,000	Affordable	Source: Discounted Sale Affordable Unit @ 70% of MV						£1,400	per m2
Plot Number 34	3 Bed	For sale		90	m2		126,000	Affordable	Source: Discounted Sale Affordable Unit @ 70% of MV						£1,400	per m2
Plot Number 35	4 Bed	For sale		120	m2		240,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 36	4 Bed	For sale		120	m2		240,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 37	4 Bed	For sale		120	m2		240,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 38	4 Bed	For sale		150	m2		300,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 39	4 Bed	For sale		150	m2		300,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2
Plot Number 40	4 Bed	For sale		150	m2		300,000	Open Market	Source: Applicant Chartered Valuation Surveyor's opinion of market value						£2,000	per m2

Appendix 5: Vacant Building Credit

The text below is taken from paragraphs 21 to 23 of National Planning Practice Guidance (NPPG).

What is vacant building credit?

National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace (paragraph 21).

What is the process for determining the vacant building credit?

Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.

The existing floorspace of a vacant building should be credited against the floorspace of the new development. For example, where a building with a gross floorspace of 8,000 square metres is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought (paragraph 22).

Does the vacant building credit apply to any vacant building being brought back into use?

The vacant building credit applies where the building has not been abandoned.

The policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy.

In doing so, it may be appropriate for authorities to consider:

- Whether the building has been made vacant for the sole purposes of re-development.
- Whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development (paragraph 23).

Appendix 6 – Gross Internal Area

The following definition is taken from the Valuation Office Agency (VOA) guidance:
Code of measuring practice: definitions for rating purposes (2012):

<https://www.gov.uk/government/publications/measuring-practice-for-voa-property-valuations/code-of-measuring-practice-definitions-for-rating-purposes>

Gross internal area

Broadly speaking the whole enclosed area of a building within the external walls taking each floor into account and excluding the thickness of the external walls.

GIA will include:

- areas occupied by internal walls (whether structural or not) and partitions
- service accommodation such as WCs, showers, changing rooms and the like
- columns, piers, whether free standing or projecting inwards from an external wall, chimney breasts, lift wells, stairwells etc.
- lift rooms, plant rooms, tank rooms, fuel stores, whether or not above roof level
- open-sided covered areas (should be stated separately)

GIA will exclude:

- open balconies
- open fire escapes
- open-sided covered ways
- open vehicle parking areas, terraces and the like
- minor canopies
- any area with ceiling height of less than 1.5m (except under stairways)
- any area under the control of service or other external authorities

Note that the areas excluded from GIA should be calculated and shown separately.

Appendix 7 – Community Led Housing Models

Community led housing (CLH) can act as a driver for communities, and is supported by both Central and Local Government. A list of community-led models is detailed in this Appendix.

The Government is keen to see increased levels of self-build housing – all party housing task force identified CLH as one driver for housing market diversity. At the first National CLH conference, the Housing Minister confirmed continuation of £60m pa CLH grant which is now extended to urban communities:

<http://www.communitylandtrusts.org.uk/article/2017/11/30/community-led-housing-conference-triumph>

<http://www.communitylandtrusts.org.uk/article/2017/11/29/government-relaunches-multi-million-community-housing-fund>

Self-build – getting better value for money in terms of quality and space standards:
www.nacsb.org.uk/

Community Land Trusts (CLTs) & co-ops – ensuring local allocations of affordable housing, protecting affordable homes in perpetuity, maximising affordability, creating support for affordable housing, improving space standards and functionality, bringing sites forward through local knowledge and contacts, influencing design:

www.communitylandtrusts.org.uk

<https://www.cds.coop/community-led-housing/>

Co-housing – communities providing an antidote to isolation, provision of shared work and meeting space, increased social support, reduced social costs. Groups decide on the mix and approach – this can include affordable housing:

<https://cohousing.org.uk>

Schemes may include a mix of the above, and also promote innovation – examples include:

- Keswick not charging rent on shared ownership unsold equity.
- Lilac co-housing – mutual ownership where leaseholders acquire an equity stake.

Communities are not required to take on all the technical aspects – advice and technical support are available through national networks, Local Authorities and Housing Associations.

Appendix 8: Useful Contacts

Carlisle City Council, Civic Centre, Carlisle, CA3 8QG

Tel: 01228 817200

lpc@carlisle.gov.uk

(Ask to speak to the Housing Development Officer, Investment & Policy team)

Cumbria County Council Development & Infrastructure Planning

Tel: 01228 606060

DM&LLFA_east@cumbria.gov.uk

Homes and Communities Agency

Tel: 0300 1234 500

mail@homesandcommunities.co.uk

Valuation Office Agency

Tel: 03000 501501

ratingnorthwest@voa.gsi.gov.uk

Local Housing Associations Development Contacts

Riverside Carlisle

Tel: 0345 111 0000

info@riverside.org.uk

Home Group

Tel: 0345 141 4663

<https://www.homegroup.org.uk/Contact%20Centre/Enquires>

Castles and Coasts

Tel: 0800 085 1171

mailbox@castlesandcoasts.co.uk

Eden Housing Association

Tel: 01768 861400

enquiry@edenha.org.uk

Brampton Rural Housing Society

Tel: 016977 2323

ruralhousing@brhs1926.com

(Alternatively, current contact details for Housing Association Development Managers will be available from the Council's Housing Development Officer).

Glossary

Affordable Homes Programme (AHP)	Bidding round for affordable housing providers (usually Housing Associations) to bid for Homes England funding to deliver affordable homes
BCIS	Build Cost Information Service – provides advice on build cost (run by the Royal Institution of Chartered Surveyors).
CIL	Community Infrastructure Levy
Cumbria Choice	Countywide choice-based lettings policy for social and affordable rented housing, managed by Housing Associations.
Custom Build	See Self-Build housing
DCLG	Department for Communities and Local Government (superseded by Ministry of Housing, Communities and Local Government, January 2018)
DEFRA	Department for Environment, Food & Rural Affairs
Extra Care Housing	A type of housing aimed at enabling older people (usually minimum age 55) to live independently within a supported environment with onsite care available
GDV	Gross Development Value
GIA	Gross Internal Area
HAPPI	Housing our Ageing Population: Panel for Innovation

Homes England	Government Department that supports the delivery of affordable and specialist housing, including through allocation of grants, usually to Registered Providers (formerly known as the Homes and Communities Agency (HCA)).
Housing Association	Organisation providing and managing affordable homes – usually for rent (see Registered Provider)
Housing Market Area (HMA)	A Housing Market Area is a geographical location defined by household demand and preferences for different housing typologies; reflecting the key functional linkages (e.g. travel to work areas and commuter patterns) between places where people live and work
Intermediate Housing	A form of affordable housing tenure usually relating to low cost home ownership products (e.g. discounted sale or shared ownership)
Lifetime Homes Standards	Lifetime Homes Standards (relating to flexible and adaptable residential design) have now been amalgamated into Part M of the Building Regulations
Local Plan	Plan setting out the long-term spatial vision and strategic objectives to support development within the District
LPA	Local Planning Authority
NaCSBA	NaCSBA (National Custom and Self Build Association)
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

OMV	Open market value (of a property)
PAS	Planning Advisory Service
PD/PDR	PD/PDR Permitted Development/Permitted Development Rights
POPPI	POPPI Projecting Older People Population Information System
Registered Provider (RP)	A Registered Provider of social housing – usually a Housing Association, regulated by the Homes and Communities Agency
Residual Land Value	Gross Development Value less Gross Development Cost (which is then compared with acceptable competitive return for a willing landowner)
RICS	Royal Institution of Chartered Surveyors
SDLT	Stamp Duty Land Tax
Section 106 Agreement (S106)	Section 106 of the Town and Country Planning Act (1990) covers Planning obligations, including affordable housing. The S106 Agreement would set out the local connection eligibility criteria in respect of the affordable housing
Self-Build & Custom House Building	House building by individuals; associations of individuals; or persons working with or for individuals or associations of individuals
SHMA	Strategic Housing Market Assessment – a strategic document, valid for a 5-year period, identifying the level of new homes required over the Assessment period, including the number, type and tenure of new affordable housing required over that period, as well as specialist accommodation requirements, such as Extra Care or supported housing

SPD	Supplementary Planning Document – providing additional context to Local Plan policies; a material consideration in determining planning applications
‘Staircasing’	This is where someone increases their share of equity in a shared ownership or shared equity property – in some cases ‘reverse staircasing’ is possible, whereby the owner reduces their equity share.
Starter Homes	A Government scheme, with full details to be updated in the NPPF - these properties will be sold to first time purchasers at 80% of full market value, with time limited discounts (provisionally 15 years).

References & Useful Websites

¹ Carlisle and District Local Plan 2015-30:

<http://www.carlisle.gov.uk/planning-policy/Local-Plan/Carlisle-District-Local-Plan-2015-2030>

² Carlisle and District Strategic Housing Market Assessment (SHMA) September 2014:

http://www.carlisle.gov.uk/Portals/24/Documents/Examination_Library/Evidence%20Base%20Documents/EB%20002%20Carlisle%20Strategic%20Housing%20Market%20Assessment%20Update.pdf?timestamp=1505830013648

³ Cumbria Choice (Choice Based Lettings Scheme) Website:

<https://www.cumbriachoice.org.uk/Data/ASPPages/1/30.aspx>

⁴ Carlisle City Council's Low Cost Housing Scheme Web Page:

<http://www.carlisle.gov.uk/Residents/Housing-and-Homeless/Low-Cost-Housing>

⁵ National Planning Policy Framework:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁶ National Planning Practice Guidance:

<http://planningguidance.communities.gov.uk/>

⁷ Planning Obligations (DCLG):

<https://www.gov.uk/guidance/planning-obligations>

⁸ Permitted Development Rights (The Town and Country Planning (General Permitted Development) (England) Order 2015):

<http://www.legislation.gov.uk/ukxi/2015/596/schedule/2/made>

⁹ Carlisle City Council Draft Heads of Terms for Section 106 Planning Obligations:

<http://www.carlisle.gov.uk/Portals/0/Documents/PDF/Draft%20Heads%20of%20Terms%20August%202017.pdf>

¹⁰ Carlisle City Council's Achieving Well Designed Housing SPD (2011):

http://www.carlisle.gov.uk/Portals/24/Documents/Local_Plan/Supplementary%20Planning%20Documents/Achieving%20Well%20Designed%20Housing%20SPD.pdf?timestamp=1479131904655

¹¹ Environment Agency Website:

<https://www.gov.uk/government/organisations/environment-agency>

¹² Flood Risk Assessments for Planning Applications (DEFRA & Environment Agency, updated 2017):

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

¹³ Cumbria County Council's Extra Care Housing and Supported Living in Cumbria Web page

<http://www.cumbria.gov.uk/healthsocialcare/ech/default.asp>

¹⁴ Cumbria County Council's Extra Care Housing and Supported Living Strategy 2016-2025:

<http://www.cumbria.gov.uk/eLibrary/Content/Internet//327/6548/425289574.pdf>

¹⁵ HAPPI 3 Making Retirement Living a Positive Choice (All Party Parliamentary Group on Housing and Care for Older People, 2016):

https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Other_reports_and_guidance/HAPPI3_Report_2016.pdf

¹⁶ Access to and use of Buildings, Volume 1: Dwellings – part M of the Building Regulations, incorporating 2016 amendments for use in England:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

¹⁷ Lifetime Homes Design Guide (Habingteg Housing Association, 2010) – please note, Lifetime Homes have now been incorporated into Part M of the Building Regulations, and this link is provided for information only:

<http://www.lifetimehomes.org.uk/pages/quick-print-version-revised-criteria.html>

¹⁸ Dementia-friendly Housing Charter (Alzheimer's Society, 2017):

https://www.alzheimers.org.uk/download/downloads/id/3485/dementia-friendly_housing_charter.pdf

¹⁹ NaCSBA (National Custom and Self Build Association) Website:

<http://www.nacsb.org.uk>

²⁰ Carlisle City Council Self-Build and Custom House Building Web Page:

<http://www.carlisle.gov.uk/Residents/Planning-Building-Control/Self-Build>

²¹ Planning for Self and Custom-Build Housing (Planning Advisory Service (PAS), 2016):
http://www.pas.gov.uk/documents/332612/6363137/Planning+for+Self-Build+and+Custom+Housebuilding+Report_final+04.pdf/0d81dfa2-01f0-4c70-8ce6-69d94f089ee0

²² National Community Land Trust (CLT) Network Website:
<http://www.communitylandtrusts.org.uk/>

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Stuart Walker Photography

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