

Examination of Carlisle District Local Plan

Matter 2 Issue 1&2 ; Matter 3 Issue 1&2

Representor reference number 043 - Mr & Mrs Ingham

Housing /Spatial Strategy.

This statement reasserts our previous objections raised during the consultation on the Local Plan and contained in the submission on Matter 2 Issue 1 & 2 and Matter 3 Issue 1&2. The following statement considers all the above matters together, since the housing need, spatial strategy and site allocation of R15 are all interlinked, one provides the context for the other.

We contend that the proposed housing requirement of 8475 dwellings over the Plan period is an unnecessary oversupply based on the range of evidence contained in the Local Plan housing needs assessments. Based on the 2012 ONS Sub National Population projections (May 2015) the population of Carlisle is expected to increase by only 200 or 0.2% over the next 25 years. Although it is projected that Carlisle's population will rise by 800 to 2025 it will then decline by 600 to the year 2037. Carlisle has witnessed only very modest natural growth of 0.1% and a negative net migration rate in recent years. Currently there are 1462 empty homes in Carlisle indicating not only a lack of demand but also suggesting further increasing the stock may have a detrimental impact on the regeneration of the older housing areas. Cumbria's present population is projected to decrease by 5900 (1.2%) by 2037, the only projected decrease amongst all the 33 counties in England.

We strongly believe that the Local Plan should be firmly based on local evidence and trends, and reflect the specific needs and aspirations of the local community. Carlisle's Local Plan should not be driven by the need to solve the housing crisis in other parts of the country, nor by national economic policy to stimulate growth through creating a debt-fuelled housing bubble.

Despite the assertion of a 70/30 split, the proposed spatial distribution of new housing is 67% in urban areas and 33% rural. Given the need for development to be sustainable, the generally higher costs of rural infrastructure and the fact that 94% of allocated housing sites in the rural area are on greenfield land, we would argue there needs to be a rebalancing downwards of the percentage allocated for development in the rural area.

As the NPPF states, the Local Plan should be accompanied by a robust evidence base which demonstrates that an adequate provision of infrastructure is present to support the proposed level of development. In view of the significant scale of the proposed development, we assert that the Infrastructure Delivery Plan fails to deliver this assurance. Given the substantial gaps in the existing provision as identified in the Delivery Plan and the massive public sector cuts already announced in advance of the Autumn Statement, we believe it is simply not credible to expect that the necessary expenditure will be found through the public purse or through developer contributions. The County Council is already facing a reduction of over £80 million in its budget over the next 3 years, whilst Cumbria Police face an expected £15 million cut next year. Without significant improvements in a whole range of infrastructure works and facilities, the quality of life for residents in Carlisle will be diminished.

The Infrastructure Delivery Plan places too much emphasis on developer contributions. There must be a question mark over the viability of the overall scale of development proposed, particularly given the range and extent of on and off site physical and social infrastructure required. It fails to adequately put forward a costed out programme of works of who will deliver, how it will be delivered and when. For instance, the Plan acknowledges there is traffic congestion on the key routes into the City which will grow more pronounced unless appropriate mitigation measures are put in place. However no strategic highway route improvements are put forward to support the future development. Somewhat naively the Plan suggests that for some of the highway works required “funding may also be available from bodies that promote the economy of Cumbria, including Cumbria Tourism and other neighbouring authorities.” This is surely misjudged.

We believe the Plan’s reliance on some windfall sites is soundly based and given knowledge of the local economy, the number of sites coming forward could be much greater. Given changing trends, particularly in retailing, with the continuing rise in internet shopping and the decline of the big four supermarket operators, it is likely more sites will come forward for housing and mixed use development. The Plan modification to scale down the Morton superstore development is an acknowledgement of changing consumer demands. Nationally Tesco are actively disposing of a number of sites for new housing and the brownfield vacant site at Caldew riverside is an obvious contender for housing / mixed use.

Housing Sites Allocated within Policy HO 1

We reiterate our comments that we are unable to reconcile the development of Hill Head (R15) with the findings of the Sustainability Appraisal. In our opinion the appraisal was at best superficial and in reality inaccurate. How can a large scale development proposed for actively farmed grade 2 agricultural land which extends on two sides into open countryside be considered neutral against criteria 16 of the Appraisal ?

We believe the Appendix is inadequate in its assessment of the suitability of the sites, in general for development and, in particular, with regard to R15. There is an unacceptable lack of detail. It fails to accurately consider the impact of the Hill Head development on the environment, the adjoining residential amenities and setting of Scotby village. Whilst it recognises there is a problem with drainage on the site, the implications and solutions are not assessed. We strongly feel that much more detailed investigation work is required before the schedule of allocated sites, and R15 in particular, can be properly considered with any confidence.

We believe the threshold of 0.4 hectares, adopted in the Strategic Housing Land Availability Assessment 2014 for sites to be included in the allocated sites survey, is too large in a rural setting. It results in “lazy planning” with large sites being included for expediency, rather than an extensive trawl of a number of smaller sites which may be better related to the village form, have a lesser impact on residential amenities and be less visually intrusive. Whilst we are not advocating further development in Scotby, there are a number of potential development sites in the village envelope which better meet the above criteria.

We were dismayed from a community consultation point of view to find that R15 had been included in the final consultation version this year when it was deleted from consideration in the previous version. Given this fundamental change we would have expected the

affected residents to be informed. Subsequently we were even more dismayed to read in the “Matters and Issues for Examination document EL1.005b ” that it now appears Scot1 (the adjacent site to the north of R15) has been deemed suitable for development. This raises a number of serious issues.

If the Highways Authority in a consultation last year “raised significant concerns about the spacing between the proposed site access to the junction with the A69” what has now changed to make the site suitable? It raises fundamental questions over the validity and accuracy of the assessment.

Given the contents of Document EL1.005b we are confused as to the status of the Scot1 site. If for some inexplicable reason, following a meeting with the developer, Scot1 is now considered acceptable, is it intended to be reinstated and R15 deleted as recommended in the consultation document last year? If it is intended that Scot1 be added to R15, where is the public consultation on this significant amendment? One of the key tenets of the Development Plan process is the genuine involvement of the community. The way this site has been considered does not look good. Transparency is crucial if the public is to have faith in the planning system. A development of around 100 houses, if that is now being considered, needs full and proper consultation and would be strenuously resisted since the objections already raised for R15 would be substantially magnified.