

Five Year Review of the Carlisle District Local Plan (2015 – 2030)

What is the Carlisle Local Plan 5 Year Review?

1. All planning applications received must be determined in accordance with the development plan (eg the Carlisle District Local Plan) unless material considerations indicate otherwise.
2. Whilst local plans largely cover a minimum 15 year period, individual policies can 'age' at different rates according to a range of circumstances. To ensure policies and the local plan as a whole, remain the effective starting point in the decision making process, we are required to formally review whether there is a need to update adopted local plan policies every 5 years¹.
3. The Carlisle District Local Plan 2015 – 2030 was adopted in November 2016 hence the need to review its effectiveness is triggered. It is worth noting that the National Planning Practice Guidance (NPPG) makes clear that a plan does not automatically become out of date once it reaches 5 years old.
4. There is no prescribed approach as to how local plan reviews are undertaken, so we have taken into account the following as advised by the NPPG:
 - Conformity of the plan with national planning policy;
 - Changes to local circumstances (particularly a significant change in Housing Need);
 - Our Housing Delivery Test performance;
 - Whether we can demonstrate a 5 year supply of deliverable sites for housing;
 - Our appeals performance;
 - Success of policies against indicators in the Development Plan as set out in the Authority Monitoring Report;
 - Plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need; and
 - Significant economic changes that may impact on viability.
5. To ensure this Plan Review comprehensively appraises the effectiveness of our Local Plan, Appendix 1 screens each policy against the current NPPF (2021) and other relevant legislation introduced since 2016. For the purposes of assessing future planning applications, each policy is R.A.G. rated (red, amber or green) as to the weight it should be afforded and whether other material considerations (*ie* the NPPF) should be given greater weight.
6. Should individual policies be deemed 'out of date', this Local Plan Review **does not** introduce the corrective changes. Depending on the nature and scale of the issues identified it may be appropriate to partially update our Local Plan (*ie* changing a limited set of policies) or ultimately prepare an entirely new Local Plan. Either process would need to be completed in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and would necessitate publishing a timetable ('Local Development Scheme') setting out the planned completion of those formal regulatory milestone stages (*eg* Regulation 18 and 19 draft stages, examination and finally adoption) through which those corrective changes are then made.

Conformity of the plan with national planning policy.

7. Our Local Plan was prepared in conformity with the first edition of the NPPF (2012). Since adoption, the NPPF was formally updated in 2018, 2019 and 2021. The NPPG has similarly been revised and updated.

¹Required by Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

8. At the time of writing, Government seeks new legislative changes through the Levelling Up and Regeneration Bill. In December 2022, it began consulting on the Levelling Up and Regeneration Bill Prospectus alongside proposed amendments to the NPPF with some revisions expected to take effect in Spring 2023, followed by more extensive revisions expected later in 2023. The main proposals relevant to the content, format or preparation of local plans include:
 - A new style of local plan (adopted within a 30 month window) that is more strategically focussed supported by site allocations. Authorities wishing current emerging plans to be considered under the existing system must submit plans for examination by June 2025. Otherwise, authorities would move straight to the proposed new plan making system;
 - Applying a suite of National Development Management Policies (to be issued by Government) which would not need to be replicated within a Local Plan ;
 - Retaining the standard method to calculate the number of homes required including the potential for authorities to deliver less than the standard method derives.
9. Whilst the above proposals provide a direction of travel, they are not approved policy so have not been taken into account as part of the screening assessment in Appendix 1.
10. This Review assesses our Local Plan against the NPPF (2021) with the results summarised below:
 - The NPPF at paragraph 11 now provides greater clarity as to what constitutes ‘sustainable development’ for both plan making and decision taking. Policy SP1 details our policy regarding the “presumption in favour of sustainable development” as it was at the time of our Plan’s adoption. It was based on the Planning Inspectorate’s ‘model policy’ who advocated its use in all local plans prepared at that time. This approach is now out of kilter with the current NPPF and is therefore no longer up to date. Policy SP1 should no longer be used and would be removed as part of any future update.
 - The Town and Country Planning (Use Classes) Order categorises all uses of land and buildings into various ‘Use Classes’. In some instances, the Order permits changes of use from one Use Class to another without the need for planning permission (known as ‘permitted development rights’). For Local Plans such as ours, Use Classes are applied in policies to regulate those uses and types of development that can take place within specific areas (such as within defined employment areas and town centres). In 2020, the categories were significantly changed (alongside some of the wider permitted development rights). This specifically affects Policies EC2 (Primary Employment Areas), EC2 (Primary Shopping Areas and Frontages) and EC5 (District and Local Centres). Whilst the integrity of those policies are considered to remain largely sound and consistent with national policy, for the purposes of decision making, account should now be made to these new Use Classes Order and the new permitted changes of use.
 - The NPPF now amends the affordable housing policy confirming that affordable housing should not be sought for ‘minor’ residential proposals (*ie* less than 10 dwellings or more). In designated rural areas, a lower threshold of 5 units or fewer may be applied. Government also introduced “First Homes” as an affordable housing product supported by a new NPPG requiring 25% of affordable housing to be First Homes with specific qualification criteria for new occupants and caps on the available discounts. On balance, it is considered Policy HO4 can operate effectively in the interim though it will need to be implemented with due regard given to the NPPF and PPG requirements for First Homes.
 - The NPPF at paragraph 62 now requires the needs of groups with specific housing requirements are addressed with consideration given to those wishing to commission or build their own homes (*ie* custom and self build housing). In accordance with Section 1 of the Self Build and Custom Housebuilding Act 2015, we maintain and regularly update our

register of those seeking to acquire serviced plots in their area for their own self-build and custom housebuilding. Our Local Plan pre-dates this and makes no specific reference to 'self or custom build'. That said, we have received and determined a variety of applications for between 1 to 20 homes under the banner of 'custom and self-build' which have been determined against Policy HO2 'Windfall Housing Development' and other relevant Local Plan policies. For the present, the Local Plan remains broadly consistent in this regard, though a future Local Plan would benefit from a specific custom and self build housing policy.

- The need to minimise the impacts of development through 'biodiversity net gain' was introduced into the NPPF in 2021. Delivering biodiversity net gain is mandatory where it is contained within an adopted local plan, though this does not presently apply in Carlisle, given this was not a requirement of national policy when our Local Plan was adopted. That said, from November 2023, unless exempt, future developments in Carlisle must provide for a minimum of 10% biodiversity net gain ensuring that the habitat for wildlife is in a better state than it would have been before development. Regard should be had to the NPPG to ensure biodiversity net gain is addressed appropriately in future planning decisions. In association with the other Cumbrian district councils and County Council, we have jointly commissioned specialist consultants to support its implementation until biodiversity net gain is appropriately addressed as part of a future Local Plan update.
- Local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Policy SP6 is the principal policy for good design which on balance, remains largely fit for purpose. That said, working with local communities, we will need to develop a district wide design code to support the implementation of Policy SP6.

Changes to local circumstances (such as a change in Local Housing Need).

11. Policy SP2 seeks to deliver some 9,606 homes between 2013 and 2030, based on an annual average rate of 565 homes. Completion targets are 'stepped' requiring 478 homes annually between 2013 and 2020 rising to 626 homes annually between 2020 and 2030. The need was based on the prevailing NPPF requiring authorities to establish their own 'objectively assessed' needs and this was thoroughly tested and confirmed at the Local Plan examination.
12. In 2018, the NPPF introduced the new 'standard method' for calculating housing need which uses a specific formula informed by nationally published ONS data which local plans are expected to follow. Based on current data, the standard method would suggest the minimum housing need calculation for Carlisle equates to delivering some 175 homes per year.
13. Paragraph 33 of the NPPF states that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. The NPPG provides further detail on whether strategic policies need reviewing on the basis of changes in housing need. It states: "*Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for as quickly as reasonably possible*". Paragraph: 062 Reference ID: 61-062-20190315.
14. We are now actively implementing Policy SP3, which requires us to prepare a separate development plan document for the broad location of growth at Carlisle South. Now referred to as 'St Cuthbert's Garden Village', it would deliver some 10,000 homes, employment space

and a range of supporting infrastructure by circa 2050. This extends well beyond the existing period of our adopted Local Plan. Following publication of a Regulation 18 draft Local Plan in November 2020, the next formal Regulation Draft Local Plan will be published in Autumn 2023.

15. On 1 April 2023, we will formally join with Copeland and Allerdale District Councils and Cumbria County Council to form the new Cumberland Council. The existing suite of adopted local plans of the respective authorities will remain in force until they are replaced by a new local plan for Cumberland. Whilst a programme for its preparation has yet to be confirmed, the new Cumberland Local Plan will amongst other things need to set out an updated position regarding the number of homes required over the plan period and the spatial distribution of that growth.
16. In light of the above range of factors, there have been and will continue to be changes at the local level regarding the number of homes required. Whilst the NPPG is clear that the trigger for a local plan update should be in those instances where the standard method generates a higher housing requirement than is set out within an authority's local plan, this obviously does not apply to Carlisle. That said, given the emerging proposals for St Cuthbert's Garden Village and the transition to a new unitary authority, there will be a need to update those housing requirements as part of the new Cumberland Local Plan.

Housing Delivery Test performance.

17. The Housing Delivery Test (HDT) introduced in 2018 allows Government to measure past housing completions against need. The calculation is expressed as a percentage by comparing housing completions over the last three years with the relevant housing need over the same period (using the standard method). Where delivery falls: below 95% of need an action plan to improve housing delivery is prepared; below 85%, a 20% buffer is added to the 5 year land supply calculations; and where below 75%, the "presumption in favour of sustainable development" applies. As detailed below, we have consistently exceeded the minimum thresholds since the HDT was first introduced.

	Total homes required	Total homes delivered	Test Score
2018 Measurement (2015/16 to 2017/18)	623	1,548	248%
2019 Measurement (2016/17 to 2018/19)	603	1,674	277%
2020 Measurement (2017/18 to 2019/20)	567	1,793	316%
2021 Measurement (2018/19 to 2020/21)	508	1,759	346%

Can we demonstrate a 5 year supply of deliverable sites for housing?

18. The NPPF requires authorities to "*identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement.*" Our last published 5 Year Supply Position Statement (April 2020) confirmed a 5.16 year supply which was based on the housing need derived from Policy SP2. A full review of the 5 Year Housing Land Supply position is scheduled to be completed in Summer 2023 following appropriate dialogue with developers, landowners and planning agents.
19. For the purposes of this 5 Year Local Plan Review, we have prepared an interim 5 year housing land supply position. This offers a proxy position to understand the likely scale of under/over supply against the 5 Year Requirement. Though this should not be relied upon as the definitive position for the purposes of decision making.
20. Calculating the 5 year housing land supply position requires us to determine the number of homes required and match this to the supply of deliverable homes over the next 5 years.

Determining the 5 Year Housing Need

21. Policy SP2 would normally provide the baseline requirement to determine the number of homes required over the next 5 years which is now 626 homes per year. However, where plans such as ours are older than 5 years, the NPPF (paragraph 74) requires authorities to identify the supply of deliverable sites “...against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old” [with footnote 39 adding] “Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance”.
22. The NPPG elaborates on this further in two sections: *Where strategic policies are more than 5 years old, or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement* [Paragraph: 003 Reference ID: 68-003-20190722]. *“Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: the plan was adopted in the last 5 years, or the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method”* [Paragraph: 005 Reference ID: 68-005-20190722]”.
23. In light of the above, we no longer rely on Policy SP2 to set the baseline requirement and instead use the ‘standard method’ (which currently equates to 175 homes per annum).
24. Further to the baseline requirement, we then add a ‘buffer’ which in our case would be either:
 - 5% to ensure choice and competition in the market for land; or
 - 20% for authorities who persistently under deliver.
25. The choice of buffer reflects past delivery. To date, 4,445 homes have been completed against the Local Plan’s requirement of 4,598 homes (under delivering by 153 homes). Previously, under delivery would have been added to the baseline requirement to calculate the five year housing need. However, this no longer applies with the NPPF now requiring us to set the buffer based on performance against the Housing Delivery Test. Given our Housing Delivery Test performance referred to above, a 5% buffer is appropriate for this calculation. When taken together, this would suggest that over the next 5 years, we would need to ensure there was enough housing land for some 919 homes.

	Annual Need	5 Year Need
Baseline requirement	175	875
Buffer @5% (rounded)	9	44
Total 5 Year Need/Target 2022/3 to 2026/7	184	919

Determining the Supply of Deliverable Homes

26. To calculate the housing land supply, it is necessary to determine what land is available and the likelihood of it coming forward during the specified five year period. Annex 2 of the NPPF comprehensively defines ‘deliverable’ sites:

‘Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

A) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

B) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

27. Engagement with the development industry (planning agents, developers and landowners) is important to evidence whether the identified supply of housing land is deliverable (eg clarifying anticipated timescales for sites coming forward and/or projected build- out and completion rates). This information would then be added to our existing monitoring data, such as previous completion rates, known market interest and data from planning applications, indicating lead-in times for different stages of the planning and delivery processes.
28. In the absence of this engagement, we have made a number of assumptions to reflect:
 - Likely build rates – Our monitoring would suggest that 30 dwelling completions or more per annum is being achieved on the majority of large sites (sites over 50 dwellings) though this can vary significantly. When supplemented with the Lichfields' research 'Start to Finish' (February 2020), the analysis shows that larger sites deliver on average more dwellings per year than smaller sites. On sites of 50-99 dwellings the median average delivery is 27 dwellings per annum, whereas sites of 100-499 dwellings delivered a median of 54 dpa. We have therefore taken a prudent approach assuming a delivery rate of 30 dwellings per annum on sites over 50 dwellings. Historic build rates show that smaller sites of 10- 50 dwellings have strong delivery rates, typically delivering within five years once commenced. This has also been factored into the delivery rates of sites.
 - Nutrient neutrality – In March 2022, Natural England informed the impact of nutrient pollution within the protected River Eden Special Area of Conservation. Consequently, we new homes must be 'nutrient neutral'. In the short term, we cannot conclude proposals would not have an adverse effect and until these matters are resolved. Hence, we cannot grant planning permission for current schemes under consideration or for new proposals within the affected catchments (which includes half of the District including the urban area of Carlisle). We are working with Natural England and other partners to develop the solution(s). It does not apply to proposals with Full or Reserved Matters permission permitted prior to March 2022 or to sites already started. We are now in receipt of applications totalling over 2,500 homes that are now caught by nutrient neutrality. For the purposes of measuring supply, we have taken a similar precautionary approach. In effect, we have assumed no development would take place in Years 1 and 2 which is based on the experience of authorities elsewhere who have previously had to address nutrient neutrality.
 - Windfall delivery of small scale sites (less than 9 homes) - An allowance can be made for small windfall sites as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply. For previous Housing Land Supply Position statements we have evidenced this source could contribute some 100 homes each year. Whilst this is likely to remain unchanged for Years 1 and 2 (ie with the pipeline of sites already with planning permission and/or have started), we are mindful that nutrient neutrality would similarly affect future small scale proposals. Accordingly, we have assumed the supply from this source could drop to 30 homes in Year 3, 4 and 5 .

29. In light of the above assumptions, we estimate that as at 1 April 2022, some 2,642 homes could be delivered over the next 5 years.

Site Category	Yr 1 2023/4	Yr 2 2024/5	Yr 3 2025/6	Yr 4 2026/7	Yr 5 2027/8	5 Year Total
Major sites with full consent	642	371	175	113	90	1391
Major sites with outline consent	0	0	445	296	220	961
Minor sites 9 or fewer/windfalls	100	100	30	30	30	290
Total	742	471	650	552	340	2,642

30. In conclusion, the potential housing land supply that is likely to equate to around **14.37 years** worth of housing land as shown below, though we accept the supply position needs to be properly ratified. That said, given the scale of the potential land supply identified through this analysis, it is reasonable to conclude a 5 year land supply position would be demonstrated meaning there should be no implications for decisions on planning applications for new housing, where the plan-led system will continue to be applied.

A Baseline number of homes needed annually	175	Based on standard method
B Baseline number of homes needed over 5 years	875	187 x 5 years
C Plus NPPF 5% buffer	44	In line with NPPF and HDT
D Total	919	Row B+C
E Deliverable Supply over 5 years	2,642	
F 5 Year Housing Land Supply	14.37 years	Row E ÷ D x 5

Our appeals performance.

31. Between January 2017 and September 2021, some 45% of appeals determined were allowed in total (comprising both major and minor applications). Though, it should be noted that the appeal success rate has dropped significantly from 66% in 2017, to 28% in 2020 and to 0% in 2021. On closer evaluation of the nature of the 16 allowed appeals, 14 comprised minor planning proposals where the majority of the deciding factors centred on subjective design based considerations as opposed to the integrity of the relevant Local Plan policies. On balance, it is therefore considered this does present a major cause for concern.

Success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report.

32. The Council's latest Authority Monitoring Report was published in December 2021. The strategy for housing growth set in SP2 remains broadly on track. SP2 details a stepped phasing approach to housing delivery setting where between 2013/14 – 2019/20, 3,445 homes were delivered against a target of 3,346 homes. For the 2020-2030 phase, 626 homes are required annually and by 2021/22, 1,000 homes were built against a target of 1,252. Though, these homes were built at the height of Covid lockdowns which nationally saw a drop in housing completions. It would be reasonable to assume that without the global pandemic, housing delivery would otherwise remain firmly on track.

Year	Target	Net Completions	Difference
2013/14	478	190	-288
2014/15	478	419	-59
2015/16	478	502	24
2016/17	478	541	63
2017/18	478	505	27
2018/19	478	625	147
2019/20	478	663	185

2020/21	626	471	-155
2021/22	626	529	-97
Total	4,598	4,445	-153

33. In terms of the economy, the District contains some 1,169,000 sqm of employment space (as at 2020/21) 88% of which comprises industrial uses (*ie* manufacturing and storage/distribution) and 12% of space in office use. Since 2000/01, our employment stock has grown by 159,000 sqm which is more than double the rate observed across Cumbria (+7.7%). Kingmoor Park Enterprise Zone comprises the districts largest industrial estate. The 45ha of land allocated at Kingmoor Park remains on track to come forward over the Plan period.
34. In terms of retailing, the Local Plan identified no requirement for new convenience provision in the city to 2030, though there was a spatial deficiency in convenience retail provision in the west and south of the city with the allocation of the new Morton District Centre and this site is now being actively marketed. Carlisle City Centre performs the role of a regional shopping destination and makes a significant contribution to the local economy, however the number of comparison retailers contained within the centre, as proportion of the total number of commercial/community uses decreased between 2019 and 2021 and was accelerated by the Covid pandemic (including the high-profile closure of the former Debenhams department store within The Lanes). That said, the decline in such uses within the Primary Shopping Area (PSA) has been more modest. By contrast, the proportion of service uses within the Centre has increased over the same period. This will be particularly boosted by Cumbria University's proposals to centralise much of its operations within the City Centre at The Citadels.

Plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need.

35. As detailed above, under Local Government Reorganisation, we will formally be joining with Allerdale and Copeland District Council to create the new unitary Cumberland Council. The comparable Westmoreland and Furness Council will be created from South Lakeland, Eden and Barrow District Councils. Under these new arrangements, both unitary authorities will be required to prepared new Local Plans to provide an appropriate planning framework for their areas. Whilst we continually engage with our adjoining authorities under the terms of the Duty to Cooperate, at present no issues have been identified by the respective authorities that they would be unable to meet their respective housing needs.

Significant economic changes that may impact on viability.

36. There have been no significant economic changes that may impact on the overall viability of the Local Plan. The Plan's policies build in safeguards regarding viability considerations which are dealt with on a case by case basis.

Do we need to update the adopted Carlisle District Local Plan 2015-2030?

37. The above demonstrates that the Carlisle District Local Plan 2015-30 remains an effective Plan which is meeting many of the needs of the District, despite the various national policy changes introduced since the Local Plan was adopted. Whilst the policy screening at Appendix 1 identifies some variances, these are not considered to be so significant so as to justify making the necessary arrangements to undertake a formal update of the Local Plan. Even if this was the case, it is considered that to carry out any necessary revisions to our adopted Local Plan would be largely abortive given:
- We will soon be embarking on the preparation of a fully NPPF compliant Local Plan for Cumberland that will replace the existing suite of adopted Local Plans of the sovereign authorities. The new Cumberland Local Plan would be the most logical mechanism to address any identified deficiencies of our adopted Local Plan.

- Whilst not formally embedded in legislation, Government intends to reform the process of plan making and will require authorities to transition to the new local plan formats as quickly as possible.
 - The proposed national reforms include the introduction of a national suite of development management policies (that would replace comparable local plan policies). Until there is greater clarity on the scope of those new policies, it would be unwise to press ahead with revisions to the Local Plan's development management policies.
38. On the balance of probability, we can demonstrate the strong likelihood that we would have a 5 year housing land supply and we are maintaining, and expect to continue maintaining, our housing delivery target. The Local Plan was prepared in the context of the National Planning Policy Framework (2012), the main emphasis of which has not been changed by its subsequent revisions.
 39. The largest significant change relates to the issues of housing need in housing need as a result of the new national approach to calculating the minimum number of homes (though the standard method need not result in reducing number of new homes required). Long term needs for the District as a whole would need to be reassessed to take into account the planned delivery of the 10,000 home St Cuthbert's Garden Village over the next 30 years alongside the need to determine the number of homes required for the new Cumberland Council area. The most appropriate vehicle to consider this would similarly be through the preparation of a new Cumberland Local Plan, as opposed to a partial update to our Local Plan.
 40. On balance, the positive position in relation to our five year supply and Housing Delivery Test provides us with a window of opportunity to carry out all relevant updates in a coordinated manner through a new Cumberland Local Plan while not moving away from the plan-led system of decision making.

Appendix 1: Carlisle District Local Plan 2015 – 2030 Policy Screening

Spatial Strategy and Strategic Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
SP1: Sustainable Development	Timely approval of applications that represent sustainable development	% applications determined within statutory timescales % appeals dismissed	Policy is in general conformity with the NPPF, in particular Chapter 2 which sets out the requirements for the presumption in favour of sustainable development which are set out at paragraph 11. which indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally.		No longer required: At the time of plan preparation, SP1 was based on the model Policy then advocated by the Planning Inspectorate (PINS). Since adoption, PINS no longer requires inclusion of this form of policy given that subsequent revisions to the NPPF have further clarified ‘the presumption’ with regards to plan making and decision taking. SP1 is therefore no longer required.	R
SP2: Strategic Growth and Distribution	Delivery of at least 9,606 net additional dwellings between 2013 and 2030 Approximately 70% of new homes delivered in the Urban area Five years of deliverable housing land at all times Adequate delivery of and forward supply of employment land to support economic growth Realisation of the opportunity presented by the part commercialisation of MOD Longtown (Solway 45) Take up of additional 18,700 m ² (net) additional comparison retail floorspace between 2012 and 2030 Respond to opportunities and encourage development on previously developed land	Net cumulative total new dwelling completions. Projected rates of delivery as illustrated through the housing trajectory. Urban/rural split of gross housing completions Annual Five Year Housing Land Supply Position Statement Employment Land uptake (Ha) and type (B1/B2/B8) Amount of employment land available (Ha) and type (B1/B2/B8) Progress toward the delivery and take up of the opportunity New (net) Comparison Retail Floorspace Amount of development on	Adoption of the Local Plan and its housing requirement pre-dates the introduction of the ‘standard method’ now advocated in the NPPF to determine the minimum number of homes required. Government remains committed to supporting authorities who want to plan for more growth, and the Planning Practice Guidance clarifies the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour – hence it is appropriate to consider whether actual housing need is higher than the standard method indicates [paragraph: 010 Reference ID: 2a-010-20201216] The wider policy remains in general conformity with the NPPF and aims to deliver sustainable development and identifies the Councils’ priorities for development including focusing growth in the existing built up area.	This policy sets the strategic framework for growth across the District. The evidence underpinning SP2 remains broadly relevant, though will require updating as part of any local plan review, particularly in light of potentially changing circumstances in regarding retailing and future employment growth to ensure it reflects current circumstances and changes to the Use Classes Order. The latest SHMA update is July 2019 (JG Consulting). The update focussed on the needs in the 2018-30 period, however key analysis also looked forward to 2050 and in particular in relation to St Cuthbert’s Garden Village. Overall, the SHMA identifies that the Government’s Standard Method would lead to a minimum housing need for circa 185 homes per annum. Planning for this scale would <i>inter alia</i> likely to see a reduction in the resident labour supply and therefore act as a barrier to economic development in the Council area. It does not preclude higher targets. To ensure economic growth, the Council will continue to develop in line with the adopted Local Plan (to 2030) and seek to provide strong delivery thereafter – this will include the development of St Cuthbert’s Garden Village.	Retain but apply with caution: the overarching strategy for growth and distribution remains sound and should continue to be applied. The strategy for housing growth set in SP2 remains on track. SP2 details a stepped phasing approach to housing delivery setting a target of 3,346 homes between 2013/14 – 2019/20 - 3,445 homes were delivered. For the 2020-2030 phase, 628 homes are required annually – by 2021/22, 1,000 homes were built against a target of 1,252 – it should however be noted delivery during this period was at the height of Covid lockdowns where nationally there was a drop in housing delivery. However, when setting the 5 Year Housing Land Supply position , the PPG is clear to calculate the homes required over a rolling 5 year period should be based on the adopted housing policies where the plan is less than 5 years old. For plans older than 5 years such as the Carlisle Local Plan, the local housing need position is calculated using the standard method [Paragraph: 005 Reference ID: 68-005-20190722]. The remaining elements of SP2 remain broadly consistent with the NPPF though a future local review would need to review the Urban/Rural split if 70-30 to reflect proposals coming forward for St Cuthbert’s Garden Village (at SP3).	A

		previously developed land.				
SP3: Broad Location for Growth: Carlisle South	Masterplan and infrastructure delivery strategy in place for Carlisle South Housing delivery at Carlisle South in line with Masterplan	Progress against timetable set out in LDS Actual dwelling completions at Carlisle South. Progress against delivery of required infrastructure	Policy is in general conformity with the NPPF particularly para 73 which details those circumstances for delivering new homes through large scale development.	Carlisle South (now known as St Cuthbert's Garden Village) is being delivered through a site specific development planning document. Accordingly, a separate evidence base is in preparation.	Policy remains sound: The emerging St Cuthbert's Garden Local Plan will upon adoption fully replace Policy SP3. In the short term, regard should also be had to the St Cuthbert's Strategic Design Supplementary Planning Document (April 2021) which provides further guidance as to the implementation of Policy SP3.	G
SP4: Carlisle City Centre and Caldew Riverside	Protect and enhance the vitality and viability of the City Centre Realisation of City Centre and Caldew Riverside development opportunities	City Centre Health Check Progress towards the realisation of identified opportunities	Policy is in general conformity with the NPPF particularly with regards to Chapter 7 which supports a positive strategy for growth of town centres and identification of a suitable range of sites to meet the scale and type of development likely to be needed.	The evidence underpinning SP4 remains broadly relevant, though will require updating as part of any local plan review, particularly in light of potentially changing circumstances regarding retailing to ensure it reflects current circumstances and changes to the Use Classes Order. Reference to expansion of the primary retail area to the north of Lowther Street and Rickergate -need reviewed updated Retail study required to determine scale and need 10 + years ahead.	Policy remains sound: City Centre boundary remains sound. With the benefit of Future High Streets Fund and Town Deal funding, a series of city centre enhancements have been delivered and are being actively developed in line with the objectives set out in the Carlisle Economic Strategy and Action Plan (2021). Citadel regeneration now has the planning approval for a mix of city centre uses to support a University Campus to attract greater student numbers and boost the number of HE learners and graduates in Carlisle. Delivery of Caldew Riverside is being still being actively pursued and promoted as a regeneration opportunity based on more . Lowther Street Primary Retail expansion remains as an option, but demand less pressing given large units in existing Primary Retail area that have since become vacant.	G
SP5: Strategic Connectivity	To protect and enhance the strategic connectivity of the District and support delivery of priorities as identified in the Infrastructure Delivery Plan and Local Transport Plan	Progress towards delivery of identified priorities	Policy is in general conformity with the NPPF. Para 92a supports pedestrian and cycle connections within and between neighbourhoods as a means of promoting social interaction. Para 186 promotes a strategic approach to air quality through, for example, traffic and travel management. Para 104c details how plans should identify and pursue opportunities to promote walking, cycling and public transport.		Policy remains sound: There remains a need for a strategic policy of this nature which is in general conformity with the NPPF. Future local plan reviews would need to reflect the status of the Carlisle Southern Link Road and Borders Railway and potentially have more emphasis on the strategic connectivity network in terms of low carbon, health and wellbeing solutions to moving people around.	G
SP6: Securing Good Design	High quality design which supports/ creates a strong sense of place	Policy usage	Policy is in general conformity with the NPPF which at para 126 states that one of the essential ways of achieving well-designed places is effective engagement between applicants, communities, LPAs and other interests throughout the process. Para 128 suggests that authorities should prepare design guides or codes at an area-wide, neighbourhood or site-specific scale as part of plan or SPD. Since the adoption of the Local Plan, Government has now introduced the National Design Guide and has updated the NPPF which advises that local authorities develop design codes working with their local communities.	Design coding will need to be undertaken in future to inform future local plan reviews. As part of this consideration should be given to delivering the concept of the "20-minute neighbourhood" since adoption of the Local Plan and its supporting evidence. which presents multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change. A Design Code is in preparation that will inform and evidence the emerging St	Policy remains sound: The policy is implemented through the Development Management process by approving new development seeks to promote good design and a sense of place. There remains a need for a strategic policy of this nature which is in general conformity with the NPPF. The policy should be used in conjunction with the National Design Guide. Future local plan reviews would need to be updated to reflect future design coding requirements and ensure that all NPPF objectives for good design are achieved including reference to accessible cycle storage, electric charging points and sustainable design and construction techniques, the potential for delivering 20-minute neighbourhoods.	G

				Cuthbert's Local Plan			
SP7: Valuing our Heritage and Cultural Identity	To protect, enhance and enable the enjoyment of the District's heritage and cultural assets	Net change in designated heritage assets Number of conservation areas with up to date appraisals and management plans Number of designated heritage assets considered to be at risk	Policy in general conformity with the NPPF as detailed in Chapter 15.	A suite of appraisals and management plans have been prepared to inform proposals within conservation areas. These will in due course need to be reviewed and updated. However, these need not necessarily have a material impact on detail contained within Policy SP7.	Policy remains sound: The policy is implemented through the Development Management process by approving new development that maximises opportunities to sustain and enhance the significance of heritage assets and their setting. There remains a need for a strategic policy of this nature which is in general conformity with the NPPF.		G
SP8: Green and Blue Infrastructure	Protection and enhancement of an interconnected and multifunctional green and blue Infrastructure network	Policy usage and S 106 Monitoring	Policy in general conformity with the NPPF which states that strategic policies should set out overall strategy for pattern, scale and design quality of places, and make sufficient provision for landscapes and green infrastructure. Para 175 further says that plans should take a strategic approach to maintaining and enhancing networks of habitats and GI and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	The Carlisle GI Strategy 2011 was the evidence base for the policy at the time. Subsequently a Green Spaces Strategy 2020-25 was published in 2018, which sets out an assessment of existing provision. It is a strategy focussing on green spaces in the district that are owned and managed by the Council. It references that the LP sets out the policies, and the GSS sets out the actions. In terms of updating the evidence base the PPG states that in order to inform strategic policy and implementation we will need a GI Framework or Strategy prepared at a district-wide scale. These need to be evidence-based and include assessments of the quality of current green infrastructure and any gaps in provision. Existing national and local strategies – for example on tree and woodland provision – can inform the approach to green infrastructure; and standards such as the Accessible Natural Greenspace Standard can be applied when assessing provision.	Policy remains sound: The policy continues to perform a useful role setting out the strategic approach to green infrastructure and the natural environment and is considered to be effective and consistent with both Councils' current objectives, as well as the NPPF. To ensure the policy can be readily implemented, a district wide GI strategy to inform future Local Plan will be needed.		G
SP9: Healthy and Thriving Communities	Improve the health and sense of wellbeing of the District's population, and reduce health inequalities.	Health Profile/Joint Strategic Needs Assessment of the District	Policy in general conformity with the with NPPF as detailed in Chapter 8. The wellbeing and health of communities is a priority for the City Council given its WHO Healthy City Status and is also being actively pursued through the emerging Local Plan for St Cuthbert's Garden Village.		Policy remains sound: Principle of policy remains sound and is supported by a range of wider policies that interlink with health such as design, open space, green infrastructure and transport which also contribute towards health indicators.		G
SP10: Supporting Skilled Communities	To support efforts to up-skill the District's population	Levels of education attainment	Policy in general conformity with the with NPPF particularly at paras 95 and 96.		Policy remains sound: There remains a need for a strategic policy of this nature which is in general conformity with the NPPF.		G

Economy Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
EC1: Employment Land Allocations	To support economic growth and increase the level of high value jobs within the local economy through making land available for employment land purposes	Take up of the allocated 45Ha employment land.	Policy in general conformity with the with NPPF with regards to paras 82-83. However, since Local Plan adoption, a new Use Classes Order was introduced in 2020 changing the category references for and permitted changes of use.	Delivery of Kingmoor Park (and the 45ha of land allocated remains on track to come forward. The emerging Socio Economic Study will provide an updated position regarding longer term employment needs including the potential for employment land releases at Carlisle South (St Cuthbert's Garden Village) based on the new Use Classes Order classifications.	Policy remains sound: Trends in economic growth, delivery (take-up) of employment land and market indicators suggest that EC1 remains an effective approach to meeting identified needs for economic growth in Carlisle. The supply of employment land should continue to be monitored on an ongoing basis to ensure sufficient supply is maintained and will be reflected in the findings of the emerging Socio-Economic Study. Future iterations of plan should retain the principle of this policy considering following updates the potential additional need for new allocations (eg subject to the evidence at Carlisle South and include updated reference to Use Classes and the permitted changes of use within them.	G
EC2: Primary Employment Areas	To safeguard primary employment areas to ensure land and premises are available to provide the wide variety of sites required to meet the needs of businesses across the plan period	Vacant floorspace (m2) and/or land in designated PEAs. Loss of PEAs (Ha) and /or floorspace (m2) to non-employment (B1, B2, B8) uses.	Policy in general conformity with the with NPPF with particular regard to para 82. However, since Local Plan adoption, a new Use Classes Order was introduced in 2020 changing the category references for and permitted changes of use.	Socio economic study will provide an updated position there may be some PEAs that should no longer be designated as such based on a qualitative and quantitative assessment of land designated	Retain but apply with caution: Trends in economic growth, delivery (take-up) of employment land and market indicators suggest that EC2 remains an effective approach to meeting identified needs for economic growth in Carlisle. The supply of employment land should continue to be monitored on an ongoing basis to ensure sufficient supply is maintained and will be reflected in the findings of the emerging Socio-Economic Study. Future iterations of plan should retain the principle of this policy considering any updates to those sites allocated as PEAs (including new additions and deletions) as informed by the emerging Socio Economic Study and include updated reference to Use Classes and the permitted changes of use within them.	A
EC3: Primary Shopping Areas and Frontages	To maintain the vitality and viability of Primary Shopping Areas through the retention of high levels of retailing (Use Class A1) at ground floor levels	% of ground floor units within the Primary Shopping Areas in A1 use. % of ground floor units within designated Primary shopping frontages in A1 use.	Policy in general conformity with the with NPPF with particular regard to para 86(b) regarding the defining a network and hierarchy of town centres and promote their long-term vitality and viability- by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries and defining range of uses acceptable in primary shopping areas. However, since Local Plan adoption, a new Use Classes Order was introduced in 2020 changing the category references for and permitted changes of use.	To be informed by updated city centre health checks, the policy remains broadly consistent with the Carlisle Economic Strategy (2021) at Objective 3 which seeks to increasing City Centre Vibrancy: diversify the range of uses present in the city centre 'encouraging and where possible facilitating leisure, cultural, employment and residential development must be a priority' and increase the mix of uses in the city centre will generate different kinds of footfall through the day and into the evening and increase the perception of vibrancy. The shift from a retail centre to a multifunctional hub will enhance the overall experience of the city centre and reposition it as a visitor destination.	Retain but apply with caution: The retail market is challenging due to several factors (including the rise of on-line sales) which will continue to affect many retailers. These conditions result in a volatile environment for the retail sector, which will nonetheless continue to provide some opportunities. With the benefit of Future High Streets Fund and Town Deal funding, a series of city centre enhancements have been delivered and are being actively developed in line with the objectives set out in the Carlisle Economic Strategy and Action Plan (2021). The policy remains broadly consistent with the NPPF and both Councils' current objectives for supporting appropriate uses within designated Areas and Frontages. EC3 is considered to be flexible enough to support changing nature of city centres, but caution needs to be applied based on the amendments to the Use Classes Order and new permitted changes – these will need to be reflected within future iterations of the Plan.	A

EC4: Morton District Centre	Delivery of a District Centre	Progress towards the delivery and take up of the allocation including foodstore anchor	Policy in general conformity with the with NPPF with particular regard to para 92 given the wider allocation for significant residential growth planned as part of the wider Morton development.	The Socio Economic Study will be required to assess the potential provision of the proposed Morton District Centres as part of the consideration for supporting district and local centre provision within St Cuthbert's Garden Village.	Policy remains sound: As part of the planned growth at Morton, the Council, as landowner, is actively pursuing delivery of the Morton District Centre proposed at EC4. Implementation of EC4 will however need to reflect the amendments to Use Classes Order and permitted changes.	G
EC5: District and Local Centres	To protect the vitality and viability of District and Local Centres	District and Local Centre Heath Checks- negative trends e.g. increases in vacancies or mix of uses.	Policy in general conformity with the with NPPF with particular regard to para 86(a) regarding the defining a network and hierarchy of town centres and promote their long-term vitality and viability- by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries and defining range of uses acceptable in primary shopping areas. However, since Local Plan adoption, a new Use Classes Order was introduced in 2020 changing the category references for and permitted changes of use.	The Socio economic study will consider the local and district centres planned and present which may be impacted by provision at St Cuthbert's Garden Village. Further updates to be informed by city centre health checks.	Retain but apply with caution: EC5 remains consistent with the NPPF and the current suite of designated centres is considered to remain appropriate. Implementation of EC5 will however need to reflect the amendments to Use Classes Order and permitted changes. Future iterations of this policy may need to be expanded to recognise the potential additional District and Local Centres coming forward within St Cuthbert's Garden Village.	A
EC6: Retail and Main Town Centre Uses Outside Defined Centres	To protect the vitality and viability of defined retail centres through controlling inappropriate out of centre retail and leisure developments	Retail centre health checks New comparison retail floorspace (m2) in out of centre locations.	Policy in general conformity with the with NPPF with particular regard to paras 87-90.		Policy remains sound: The Local Plan continues to set out an appropriate retail hierarchy of centres and provides a framework that is sufficiently flexible to respond to / accommodate ongoing changes whilst still supporting the principle role and vitality and viability of those centres from inappropriate out of centre proposals.	G
EC7: Shop Fronts	To help establish a strong sense of place through well designed shop fronts	Policy usage	Policy in general conformity with the with NPPF with particular regard to the requirements for well designed places set out in Chapter 12.		Policy remains sound: The policy is implemented through the Development Management process by approving well designed and appropriate shop fronts.	G
EC8: Food and Drink	To facilitate the creation of a vibrant and viable food and drink offer across the District	Retail Centre health checks Policy usage	Policy in general conformity with the with NPPF with particular regard to para 92 which supports the provision of healthy, inclusive and safe places that enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.		Policy remains sound: EC8 remains consistent with the NPPF. Implementation of EC5 along with any future iterations of this policy will however need to reflect the amendments to Use Classes Order and permitted changes.	G
EC9: Arts, Culture, Tourism and Leisure Development	To protect and enhance the District's arts, cultural, tourism and leisure offer	Policy usage	Policy in general conformity with NPPF, in particular para 84 to plan positively for social, recreational and cultural facilities and services and supporting a prosperous rural economy along with Chapter 7 which supports such uses within town centres.	EC9 continues to reflect the Councils' priorities for leisure, culture and tourism facilities in in both the city centre as part of its Economic Strategy (2021) as a key visitor destination, while supporting the visitor economy in the Rural areas.	Policy remains sound: EC9 remains consistent with the NPPF and the current suite wider policies designed to protect and enhance the role of the city centre and its wider tourist, leisure and cultural attractions across the District.	G
EC10: Caravan, Camping and Chalet Sites	To facilitate visitor accommodation in appropriate locations	Policy usage	Policy in general conformity with NPPF, in particular para 84 to plan positively for social, recreational and cultural facilities and services and supporting a prosperous rural economy.		Policy remains sound: EC10 remains consistent with the NPPF regarding the need to support a prosperous rural economy.	G
EC11: Rural Diversification	To enable rural diversification in order to support the rural economy	Policy usage	Policy in general conformity with NPPF, in particular para 84 to plan positively for social, recreational and cultural facilities and services and supporting a prosperous rural economy.		Policy remains sound: EC11 remains consistent with the NPPF regarding the need to support a prosperous rural economy.	G

			The policy makes provision for 'sustainable economic activities' in rural areas in both new buildings or the conversion of existing buildings, subject to meeting 4 criteria.			
EC12: Agricultural Buildings	To support ongoing agricultural investment and activities within the District	Policy usage	Policy in general conformity with NPPF, in particular para 84 to plan positively for social, recreational and cultural facilities and services and supporting a prosperous rural economy. The policy makes provision for 'sustainable economic activities' in rural areas in both new buildings or the conversion of existing buildings, subject to meeting 4 criteria.		Policy remains sound: EC12 remains consistent with the NPPF regarding the need to support a prosperous rural economy.	G
EC13: Equestrian Development	To support ongoing equestrian investment and activities within the District	Policy usage	Whilst equestrian development is not listed specifically within the NPPF, it is considered this remains in broad conformity with para 84 of the NPPF.	n/a	Policy remains sound: EC13 remains consistent with the NPPF regarding the need to support a prosperous rural economy.	G

Housing Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
HO1: Housing Strategy and Delivery	Site allocations contributing to housing delivery as anticipated	Delivery of site allocations in line with policy.	Policy in general conformity with NPPF, in particular paras 68 to 80 regarding making sufficient suitable, developable and deliverable land available to meet the identified housing needs.	Delivery of new homes is in part assessed through the Strategic Housing Market Assessment and 5 Year Housing Land Supply Statements.	Policy remains sound: The majority of the housing allocations in the CDLP have come forward for development or are at least pre-app or application stage. As such, delivery of those sites allocated remains broadly on track with housing trajectory. Any remaining sites will be targeted for intervention and in the first instance this will be an approach to the landowner to see what is preventing them from bringing their site forward. The Local Plan requires delivery of St Cuthbert's Garden Village in part to meet the residual housing requirement to 2030 and this is currently being brought forward through a separate Local Plan.	G
HO2: Windfall Housing Development	Annual average of at least 100 windfall dwelling completions	Actual and projected rates of windfall delivery.	Policy in general conformity with NPPF, in particular paras 69 which supports the delivery of suitable windfall (unallocated) sites.	SHLAA update will be required to provide a robust indication of aggregate housing capacity across the district. SHLAA update is underway.	Policy remains sound: Suitably located windfall developments make a small but important contribution to meeting a range of housing needs. To date, the policy remains largely effective in this regard. Future local plans should give consideration to the further clarifying criterion 3 with regards to differentiating between edge of settlements and 'open countryside' and the definition of 'unacceptable intrusion'. The penultimate paragraph is largely a repetition of criterion 2.	G
HO3: Housing in Residential Gardens	To preserve the character and quality of housing areas	Policy usage	Policy in general conformity with NPPF, in particular para 71 which suggests that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Residential gardens cannot be considered brownfield.		Policy remains sound: Suitably located windfall developments make a small but important contribution to meeting a range of housing needs. Future local plans should give consideration to the further clarifying that gardens have benefits for biodiversity.	G
HO4:	To contribute towards	The number of	Policy in general conformity with NPPF, in particular para	HO4 applies a differential rates across the	Retain but apply with caution: The Policy is considered to be	A

Affordable Housing	meeting affordable housing needs through securing affordable homes from qualifying open market housing developments	affordable homes delivered (by tenure / property type / location)	<p>63. Though since adoption of the Local Plan, NPPF revisions have introduced additional requirements and clarifications including:</p> <p>Para 64 clarifies that affordable housing should not be sought on for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer) para 65 requires that major developments should (subject to certain exemptions) provide at least 10% of the homes for low-cost home ownership</p> <p>The PPG's introduction of First Homes as an affordable housing product with a requirement for 25% of affordable housing to be <i>this product</i> with specific qualification criteria for new occupants, and caps on the available discounts.</p> <p>Para 58 also confirms that in cases where applicants claim they cannot viably deliver the full S106 requirement Economic Viability Assessments must now be made publicly available.</p>	<p>District informed by development viability.</p> <p>The SHMA suggests an annualised requirement for 158 affordable homes per annum. To date, some 29% of the housing completions have been affordable equating to some 108 affordable homes completed p.a.</p> <p>It should be noted that affordable completions can fluctuate significantly depending on the level of RP-led development (funded by Homes England) in addition to fluctuations in viability which can be affected by a combination of macro economic conditions (such as rising costs of materials) or unforeseen site specific abnormal costs.</p>	<p>largely effective, supported by up to date evidence of development viability, though it should be applied with consideration given to updates set out in the NPPF and First Homes initiative detailed within the PPG.</p> <p>It would be preferable to continue with other intermediate tenures (e.g. Discounted Sale; Shared Ownership; Rent to Buy) alongside First Homes, as these are more flexible tenures in respect of the qualification criteria. For instance, many of the people currently housed under the Council's low-cost housing (discounted sale) scheme are people seeking to get back on the housing ladder following a divorce or relationship breakdown, who would not qualify under the First Homes policy.</p> <p>Future local plans will need to updated in several key areas:</p> <p>Evidence of development viability to ensure the zonal charging areas and rates are realistic and deliverable. Consideration will also need to be given to introducing an additional charging zone area to reflect St Cuthbert's Garden Village.</p> <p>First Homes can in the interim be managed within the existing framework that HO4 provides alongside the PPG requirement for 25% of affordable housing to be First Homes.</p>	
HO5: Rural Exception Sites	To make provision for rural housing need	Policy usage	<p>Policy in general conformity with NPPF. Para 78 and 79 states that LPAs should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this.</p> <p>The definition of exception sites in the NPPF references the needs of the 'local community' who are either current residents or have an existing family or employment connection.</p>	<p>The SHMA update 2019 undertook analysis to estimate the need for affordable housing in the 2018-30 period. In the rural west and rural east areas of the district combined the estimated need is for 82 homes.</p> <p>The SHMA does not provide an affordable housing target as the amount of affordable housing delivered will be limited to the amount that can be viably provided. However, the evidence does still suggest that affordable housing delivery should be maximised where opportunities arise.</p>	<p>Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.</p>	G
HO6: Other Housing in the Open Countryside	To protect the open countryside from inappropriate housing development whilst recognising there may be special circumstances where new housing will be allowed	Policy usage	<p>Policy in general conformity with NPPF. Para 80 continues to outline when and where isolated housing in the open countryside will be permitted. This policy builds on each of the criteria presented in the NPPF. However, HO6 does not reflect the guidance regarding designs of exceptional quality. but it is considered sufficient to rely on NPPF for this element for the purposes of decision making.</p>		<p>Policy remains sound: The Policy is well used and continues to strike a good balance between protecting the countryside and allowing suitable development to take place.</p> <p>Future Local Plans would need to address proposals of exceptional design.</p>	G
HO7: Housing as Enabling Development	To assist in protecting Heritage Assets	Policy usage and decision monitoring.	<p>The NPPF continues to allow planning authorities to consider granting permission for housing as enabling development in cases where it would otherwise be refused when it can be shown it would secure the future conservation of a heritage asset.</p>		<p>Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.</p>	G
HO8: House Extensions	To assist in adaption of existing dwellings to meet changes in	Policy usage	<p>NPPF does not provide explicit detail regarding minor householder applications, although promoting good design is address specifically within Chapter 12.</p>		<p>Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives</p>	G

	lifestyle				regarding good design.	
HO9: Large Houses in Multiple Occupation and the Subdivision of Dwellings	To contribute to the mix of housing offer within the District	Policy usage	NPPF does not provide explicit detail regarding HMO and sub-divisions of homes. However, para 62 requires plans to cater for different groups in the community.	2019 SHMA recognises that HMOs continue to have a role in housing provision as part of private rented sector.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HO10: Housing to Meet Specific Needs	To contribute to the mix of housing offer within the District	Policy usage Number of additional specialist accommodation and/or supported housing units delivered.	Policy in general conformity with NPPF. Para para 62 requires plans to cater for different groups in the community including but not limited to older people, students, people with disabilities and families.	Affordable and Specialist Housing SPD adopted Feb 2018 (updated Oct 2019). SHMA / Cumbria CC's Extra Care Housing and Supported Living Strategy (2016-25)	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HO11: Gypsy, Traveller and Travelling Showpeople Provision	To meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople	Net increase in permanent pitches and plots delivered Turnover on permanent sites Net increase in transit pitches and plots delivered	The Government's 'Planning Policy for traveller sites' (2015) sets out how travellers' housing needs should be assessed. HO11 conforms with the governments aims as set out in the policy paper, for authorities to make their own assessment of the need for traveller sites, providing sites which are accessible to local services e.g. schools, and protecting local amenity and environment.	Since the Local Plan was adopted, a new GTAA has been prepared (2022)	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. Future iterations of policy will need to reflect future evidence findings from the GTAA including preparation of a Pitch Delivery Assessment (PDA), to identify how much of the need can be delivered through existing privately-owned sites, in order to determine the required number of pitch allocations.	G
HO 12: Other Uses in Primary Residential Areas	To protect the amenity of Primary Residential Areas	Policy usage	NPPF continues to expect planning policies to protect and deliver high standards of amenity in development. No national policy change in this regard since 2012.	N/a.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G

Infrastructure Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
IP1: Delivering Infrastructure	To ensure timely delivery of infrastructure needed to support delivery of the Plan	Delivery mechanisms within IDP	Policy in general conformity with NPPF. Ensuring developments have the right infrastructure they need, and it is delivered in a timely fashion continues to be a recurring theme throughout the NPPFeg paras 73, 82, 92, 96, 104, 106, 124 and 153.	Council will no longer be taking forward a community infrastructure levy.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. Future iterations of policy may want to remove reference to CIL.	G
IP2: Transport and Development	To minimise the impact of new developments on the transport network	Type, nature and location of new developments	Policy in general conformity with Chapter 12 of the NPPF. The policy continues to continues emphasis on sustainable transport in new development, including ensuring good accessibility to public transport, active travel networks, the requirements travel plans and transport assessments. The need for charging points is now expressly mentioned in NPPF as something to consider when making policies on parking.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G

IP3: Parking Provision	To ensure appropriate parking standards are adhered to Adoption of SPD setting out parking standards	Compliance with any standards in operation Progress against timetable set out in LDS	Policy in general conformity with the NPPF, in particular para 107. The NPPF continues to allow authorities to set own standards based on certain sustainability criteria – all of which is reflected in Cumbria Design Guide.	County Council design guide includes updated references to parking provision. Decision taken that this removes the need for a Carlisle specific SPD. Decision taken to remove the SPD from the most recent LDS.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
IP4: Broadband Access	To ensure new developments benefit from access to high speed internet	Policy usage Infrastructure Delivery Plan	Policy in general conformity with the NPPF. Chapter 10 is now much clearer on how it addresses broadband and digital communication technology. Policies should be outlining how FULL fibre will be provided as part of new development. And also show how access to these technologies can be future proofed as much as possible.	This is a rapidly changing sector and technology has moved on significantly in terms of broadband availability, speeds and demand since the Local Plan was adopted.	Retain but apply with caution: whilst the principle of the policy remains sound, regard should be had to para 114 of NPPF regarding broadband speeds.	A
IP5: Waste Minimisation and the Recycling of Waste	To reduce the level of waste and improve levels of recycling	Levels of residual household waste per household (kg) Levels of household waste sent for re-use, recycling or Composting (%)	NPPF continues to expect methods for waste minimisation to be included within development proposals.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
IP6: Foul Water Drainage on Development Sites	To ensure sufficient capacity for foul water drainage to support growth	Policy usage Infrastructure Delivery Plan	Policy is in general conformity with the NPPF. Whilst foul water drainage is not referred to specifically, the subject matter is considered under the broad umbrella of ensuring all development has the infrastructure it needs which is referenced significantly throughout.	Policy originally informed through consultation with United Utilities. UU have confirmed that policy is still in line with their approach.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. Future local plan reviews, may need to give reference to Nutrient Neutrality within proposals for overnight accommodation.	G
IP7: Carlisle Airport	To facilitate the ongoing operation of Carlisle Airport	Policy usage	Policy is in general conformity with the NPPF, para 107(e) which supports their operation and expansion and the contribution to the wider local economy		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
IP8: Planning Obligations	To secure any measures agreed as necessary to make development acceptable in planning terms	S106/CIL monitoring as reported annually	Policy is in general conformity with the NPPF, paras 55 to 58. The NPPF sets out three tests that obligations must meet to be considered sound – necessary for the development to be made acceptable, directly related to the development, and fairly and reasonable related in scale and kind to the development. IP8 including reference to where developers seek to depart from any obligations being sought.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. An update to the IDP should be considered in future to ensure infrastructure contributions remain appropriate as part of a future Local Plan, which should also remove references to the Council preparing a Community Infrastructure Levy. This is no longer to be taken forward.	G

Climate Change and Flood Risk Polices

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
CC1: Renewable Energy	To facilitate/enable development which contributes to generating renewable energy	Capacity in kW output of approved applications Number of applications received	Policy in general conformity with NPPF, in particular, paras 152, 155, 156 and 158.	The Council declared a climate change emergency in in 2019 and subsequently adopted a Climate Change Strategy Action Plan. Renewable energy has an important role to play in reducing emissions created through energy generation and should therefore continue to be supported in policy	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CC2: Energy from Wind	To facilitate/enable development which contributes to generating renewable energy from wind DPD to identify suitable areas for wind energy development is in place	Capacity in kW output of approved applications Number of applications received Progress against timetable set out in LDS	Policy in general conformity with NPPF, in particular, paras 152, 155, 156 and 158	The Council declared a climate change emergency in in 2019 and subsequently adopted a Climate Change Strategy Action Plan. Wind energy has an important role to play in reducing emissions created through energy generation and should therefore continue to be supported in policy.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CC3: Energy Conservation, Efficiency and Resilience	To ensure development proposals are energy efficient and resilient to the impacts of climate change	Policy usage	Policy in general conformity with NPPF, in particular, paras 152, 153, 154, 155, 156, 157 and 158	The Council declared a climate change emergency in in 2019 and subsequently adopted a Climate Change Strategy Action Plan. Energy efficiency has an important role to play in reducing emissions and should therefore continue to be supported in policy.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. Principle of policy remains sound. Future iterations should also consider the future requirements for and implications of retrofitting buildings to improve energy efficiency and resilience.	G
CC4: Flood Risk and Development	No development which would be subject to flood risk or increase the possibility of flood risk elsewhere	Number of applications granted against flood authority advice	Policy in general conformity with NPPF, in particular, paras 159 to 169 and guidance in the PPG.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. The policy is being applied effectively through the development management process in order to minimise new development at risk of flooding as indicated by the Strategic Flood Risk Assessment. The Council is working with the Local Lead Flood Authority and the Environment Agency to ensure that dwellings are not at risk of flooding.	G
CC5: Surface Water Management and Sustainable Drainage Systems	Prioritisation of SUDs in new development sites	Number of applications granted against flood authority advice	Policy in general conformity with NPPF, in particular, para 169 and guidance in the PPG.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. The policy is being applied effectively through the development management process in order to minimise new development at risk of flooding as indicated by the Strategic Flood Risk Assessment. The Council is working with the Local Lead Flood Authority and the Environment Agency to ensure that dwellings are not at risk of flooding and SuDs schemes are being secured.	G

					<p>United Utilities have updated their suggested policy wording for this policy, but policy is considered flexible enough to capture this.</p> <p>Future iterations of the Policy would however need to give reference to requirements for Nutrient Neutrality.</p>	
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Health, Education and Community Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
CM1: Health Care Provision	Support New Health Care Provision	Type, nature and location of new healthcare provision	Policy in general conformity with the with NPPF as detailed in Chapter 8. NPPF continues to support the creation of healthy places and this is consistent with wider NPPF references regarding the need for development to be supported by the infrastructure it needs and is delivered in a timely fashion. This is a recurring theme throughout the NPPF eg paras 73, 82, 92, 96, 104, 106, 124 and 153.	An update to the IDP should be considered for future local plans to ensure infrastructure contributions remain appropriate.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CM2: Educational Needs	Support Educational Provision	Sufficient capacity to support proposed growth	Policy in general conformity with the with NPPF particularly para 95. CM2 is consistent with wider NPPF references regarding the need for development to be supported by the infrastructure it needs and is delivered in a timely fashion. This is a recurring theme throughout the NPPF eg paras 73, 82, 92, 96, 104, 106, 124 and 153.	An update to the IDP should be considered for future local plans to ensure infrastructure contributions remain appropriate.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CM3: Sustaining Community Facilities and Services	Avoid loss of valued community facilities and services	Policy usage Number of facilities registered as a community asset	Policy in general conformity with the with NPPF particularly para 93 regarding the planning for the provision of social, communal and recreational facilities. Policies should guard against the loss of community facilities, especially where this would stop people from meeting their day to day needs within their community.	Policy references community asset register. Register is still active and regularly updated so policy reference remains valid. An update to the IDP should be considered in future to ensure infrastructure contributions remain appropriate.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CM4: Planning Out Crime	Design of development deters crime	Policy usage	Policy in general conformity with the with NPPF particularly para 92 regarding the design of safe communities which reduces crime and the fear of crime.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CM5: Environmental and Amenity Protection	To protect the environmental and residential amenity	Policy usage	Policy in general conformity with the with NPPF particularly paras 174, 183 to 188. The NPPF continues to expect pollution from development to be minimised. New and existing development should be protected from unacceptable levels of soil, air, water, noise pollution and subsidence. The NPPF seeks to ensure that ground contamination issues are considered within the decision making process. Policies should focus on whether proposals are acceptable use of land (taking local amenity of other uses into account) rather than seeking to control processes or emissions.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
CM6: Cemetery and Burial Grounds Provision	To facilitate and enable additional cemetery and burial grounds	Type, nature and location of new cemetery provision	NPPF doesn't specifically mention cemeteries beyond passing reference in the green belt chapter. They fall under a wider green/open space category with national policy being to ensure adequate provision is positively planned for.	Healthy City Team confirm a new cemetery site is still required.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives. An update to the IDP should be considered in future to ensure infrastructure contributions remain appropriate.	G

Historic Environment Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
HE1: Hadrian's Wall World Heritage Site	To protect Hadrian's Wall World Heritage Site from inappropriate development	Policy usage	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets (such as world heritage sites) being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a world heritage asset should be supported. Policy continues to be in conformity with NPPF. Hadrian's Wall management plan has not changed since this policy was adopted.	No changes have been made to the World Heritage Site designation since the Plan was adopted. The Lake District National Park has since been designated a World Heritage Site, but it lies wholly outside the district's border and is unlikely to be impacted by development within Carlisle District. Additional policy reference to the LDNP WHS not considered necessary.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HE2: Scheduled Ancient Monuments and Non-Designated Archaeological Assets	To protect scheduled and non-designated archaeological assets as a resource for research, education, leisure, tourism and for their influence on perceptions of identity and sense of place	Net change in designated Heritage assets – negative trends would trigger a review of policy.	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a heritage asset should be supported.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HE3: Listed Buildings	To protect buildings and/or structures that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest	Net change in designated Heritage assets – negative trends would trigger a review of policy.	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a heritage asset should be supported.	No significant deteriorating trends in listed building designations	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HE4: Historic Parks and Gardens	To protect buildings and/or structures that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest	Net change in designated Heritage assets.	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a heritage asset should be supported.	No additional historic parks and gardens have been designated since adoption of policy	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HE5: Historic Battlefields	To protect buildings and/or structures that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest	Net change in designated Heritage assets.	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a heritage asset should be supported.	No additional historic battlefields have been designated since adoption of policy.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
HE6: Locally Important Heritage Assets	To protect locally important heritage assets that have not been placed on the Statutory List of Buildings of Special	Policy usage. No. Of assets included on a local list.	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a heritage	Locally listed designations continue to include key townscape frontages. Some work has been done to establish a nomination process for local listings. No additional locally listed assets have so far been nominated, but a process is in place	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G

	Architectural or Historic Interest		asset should be supported. Policy continues to be in conformity with NPPF. Local listings are specifically mentioned within the definition of a 'heritage asset' in the NPPF.	for their consideration and inclusion on the list if they are of merit. Planning policy not considered an obstacle to bringing nominations forward.		
HE7: Conservation Areas	To preserve or enhance the character and appearance of conservation areas	Policy usage	Policy in general conformity with the with NPPF particularly with regards to Chapter 16. The NPPF continues to ensure heritage assets are protected from harm with most important assets being granted the strongest protection. Development that could better preserve or enhance the historical integrity of a heritage asset should be supported.		Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G

Green Infrastructure Policies

Policy	Objective	Indicator	NPPF/PPG/other national policy conformity	Evidence base considerations	Conclusion & Recommendation	Policy Status
GI1: Landscapes	To protect against insensitive development	Policy usage	Policy in general conformity with the with NPPF particularly paras 175 to 177. The NPPF continues to place importance on protecting and enhancing landscapes, including direct reference to recognising the intrinsic character and beauty of the countryside, which supports the 'all landscapes matter' approach of GI 1. Reference to protecting dark skies remains current within the NPPF.	Cumbria landscape character guidance and toolkit (2011) remains current and continues to inform decisions relevant to this policy. Document is somewhat dated now but remains our most comprehensive evidence base for landscape character across the district. The approach to assessing the capacity of landscapes to support change and the potential threats from development could face, as presented in the toolkit, also remains a valid approach. More locally specific assessments have been carried out for St Cuthbert's Garden Village providing more detail for these areas – including the St Cuthbert's Landscape and Townscape appraisal, and the Brisco and Durdar Landscape Sensitivity Study. Policy could be included to reference these more detailed studies, introducing the requirement for similar locally specific studies to be carried out where large scale development likely to have a major impact on the landscape setting of an area is proposed.	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G
GI2: Areas of Outstanding Natural Beauty	To protect and enhance the natural beauty and special characteristics and landscape quality of the Solway Coast and the North Pennine AONBs	Policy usage	Policy in general conformity with the with NPPF particularly paras 175 to 177. The NPPF continues to include strong protection for nationally designated landscape assets, such as AONBs. Cross-boundary considerations – need to ensure AONB policies continue to be in line with other districts' AONB policies where AONBs are shared across boundaries.	Both North Pennines and Solway Coast have updated their management plans since CDLP was adopted. Policy is written however to only refer to the most up to date management plans. Wording in both the policy and the supporting text therefore remain current in this regard without the need to update. Policy refers directly to the Solway Coast AONB landscape character assessment. This document is becoming somewhat dated now, but it remains our most detailed	Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.	G

				evidence base for the AONB and is still current.		
GI3: Biodiversity and Geodiversity	No net loss of biodiversity or geodiversity	Net change in designated biodiversity and geodiversity assets.	<p>Policy in general conformity with the with NPPF particularly paras 174 to 175. It should be noted the NPPF para 20 states that strategic policies should set out overall strategy for pattern, scale and design quality of places, and make sufficient provision for ... <i>conservation and enhancement of the natural environment</i> but doesn't specifically reference biodiversity.</p> <p>The BNG requirement in the Environment Act will not become law until Nov 2023.</p>	<p>The policy seeks to protect, and where possible, enhance biodiversity assets across the district, and sets out 5 principles to apply when considering planning applications. It also details the approach to be taken to international through to local sites.</p> <p>The emphasis in the NPPF goes beyond this and requires biodiversity to be improved (the environmental objective). It states that planning policies and decisions should provide net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures. In particular, to protect and enhance biodiversity and geodiversity plans should identify and pursue opportunities for securing measurable net gains for biodiversity.</p>	<p>Retain but apply with caution: the overarching strategy for growth and distribution remains sound and should continue to be applied. The protection and hierarchy of biodiversity assets remains current and should continue to inform decisions.</p> <p>However, the requirement for mandatory 10% minimum net gain will be introduced from November 2023 and will need to be applied from that date. It is currently only mandatory if there is a policy in a Local Plan. A new policy would be needed to build up on emerging net gain requirements in the Environment Act. The NPPG on 'biodiversity, geodiversity and ecosystems' has useful advice regarding evidence that may be necessary.</p> <p>Future local plans will need to update the GI3 referencing the requirements to bio diversity net gain with further consideration to amending the strategic policy SP9.</p>	A
GI4: Public Open Space	No unacceptable loss of public open space Ensuring new housing developments in excess of 20 units, where required, provide or contribute to the creation of additional public open space	Amount of public open space (Ha) lost Amount (Ha) of public open space secured on new housing developments	<p>Policy in general conformity with the with NPPF particularly paras 98 to 99. The NPPF retains emphasis on ensuring access to a network of high quality open spaces and opportunities for sport and physical activity. It continues to recommend that policies be based on up to date needs assessments for open space, sport and recreation facilities.</p> <p>Policy remains in conformity with NPPF, wording reflects and builds on the approach outlined in NPPF.</p>	<p>Policy references Playing Pitch Strategy from 2013. A new Playing Pitch and Outdoor Sports Strategy is currently in development and in future this should be used to inform proposals relating to playing pitches and outdoor sports.</p> <p>An update to the Open Space Audit is scheduled to be prepared.</p>	<p>Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.</p>	G
GI5: Public Rights of Way	No net loss of public rights of way	Amount of public rights of way (km).	<p>Policy in general conformity with the with NPPF particularly para 100. The NPPF continues to ensure that rights of way are protected and enhanced as part through the planning process. Opportunities to provide better facilities or improved connections should be taken where possible.</p>		<p>Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.</p>	G
GI6: Trees and Hedgerows	No unauthorised loss of trees subject to a TPO or hedgerows qualifying as 'important' under the Hedgerow Regs 1997	Number of TPOs Amount of 'important' hedgerows – a negative trend would trigger a review.	<p>Policy in general conformity with the with NPPF particularly paras 131, 174 and 180. The NPPF now confirms the importance of trees within the design of schemes advising that new streets are tree lined. NPPF also encourages additional planting and using opportunities to incorporate trees within new development.</p> <p>Policy relies strongly on British Standard: BS 5837 which remains current.</p> <p>Policy provides hook to Trees and Development SPD, which was last amended in 2009. SPD is still regularly used by DM in planning decisions.</p>		<p>Policy remains sound: The Policy is considered to be effective, supported by up to date evidence, and consistent with the NPPF and both Councils' current objectives.</p>	G