



## PORTFOLIO AREA: ECONOMIC DEVELOPMENT

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Date of Meeting: 13th February 2012

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Public

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Key Decision: Yes

Recorded in Forward Plan:

No

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Inside/Outside? Policy Framework

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**Title: INTERIM PLANNING STATEMENT - HOUSING**

**Report of: DIRECTOR OF ECONOMIC DEVELOPMENT**

**Report reference: ED. 07/12**

### Summary:

This paper sets out the need for an Interim Planning Policy Statement (IPPS) to provide further planning policy guidance on how the Council intends to deal with the shortfall in the delivery of new housing and manage the release of housing land prior to the adoption of the new Local Development Framework (LDF).

### Recommendations:

It is recommended that the interim planning statement for housing is approved for consultation

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**Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers: None**

## **1. BACKGROUND INFORMATION AND OPTIONS**

- 1.1 The Council is committed to preparing its Local Development Framework (LDF) which will bring forward a new Core Strategy setting out the spatial direction for future development and will be supplemented with a detailed allocation of sites plan to deliver that strategy. Work is well underway and to timetable. However the statutory processes require a number of stages to be completed until it can be adopted by the Council.
- 1.2 As part of the evidence base for future housing policies and the development of a housing strategy the Council published its Housing Needs and Demand Study in November 2011. This study identified an immediate shortage of affordable housing, and depending on which option is followed, the need to provide additional open market housing to meet economic needs as well as growth aspirations.
- 1.3 At the end of 2011 the Council also published its LDF Annual Monitoring Report covering the period April 2010 to March 2011. This report clearly indicates that whilst the authority has granted a number of planning consents for new housing the proportion of these being delivered in the current economic climate is reduced. The Council has to ensure that a 5 year supply of housing is always available to be developed i.e. with planning consent. In order to monitor this position more closely an update of the housing supply position to the end of October 2011 was undertaken. This indicates that the Council only had 3.63 years supply as of 30<sup>th</sup> September 2011.
- 1.4 Most of the sites allocated for housing in the current Local Plan have now either been developed or have consent. A high level of demand and a shortage of deliverable supply puts the Council in a vulnerable position regarding planning applications for housing development. Where local planning authorities are unable to demonstrate an up-to-date five year supply of deliverable sites, Planning Policy Statement 3 (PPS3) stipulates that they should consider planning applications for housing favourably, whilst having regard to the other policies in PPS3 and ensuring that proposals do not undermine wider policy objectives.
- 1.5 In order to ensure that development proposals do not undermine wider planning policy objectives it would be prudent to set out an interim policy. This policy will not allocate specific development sites for housing but will guide where development may be appropriate and the circumstances under which it may be acceptable. This interim policy would be in place until the Core Strategy provided the new direction for development.

- 1.6 The lack of guidance provided by an Interim statement could limit the ability to manage growth and align it to the forthcoming Core Strategy.

### **What will the Interim Statement Do?**

- 1.7 Although this interim policy is not an official Development Plan Document, it will be treated as a material planning consideration in the assessment and determination of planning applications for residential development until the adoption of the LDF Core Strategy or a 5 year supply has been demonstrated whichever is the sooner.
- 1.8 The Interim Planning Policy Statement (IPPS) will give planning policy guidance which will identify a series of considerations that are material to applications, and to provide clarity about how the Council intends to approach these considerations.
- 1.9 The interim policy will also be used in conjunction with all other policies in the Local Plan and all residential development should seek to widen the supply of house types in line with the latest Housing Need and Demand Study.
- 1.10 Whilst the interim policy does not place ceilings on the size and scale of development, schemes that would prejudice the proper planning of new employment, services and infrastructure will not be allowed. The Council will consider whether granting further permissions would undermine the achievement of our policy objectives, having regard to work on the emerging Local Development Framework.
- 1.11 Furthermore, the Council will also consider phasing the development of large sites permitted under this interim policy, where this is demonstrated to be necessary in order to co-ordinate new housing with infrastructure and the provision of community facilities.
- 1.12 All residential development proposals will therefore be required to contribute towards planning obligations in line with the tests of Circular 05/05. Any sites coming forward will have to ensure that they do not prejudice proper infrastructure provision in their locality and may have to contribute towards cumulative contributions for infrastructure provision. This may be particularly relevant to matters such as strategic green infrastructure, highway provision, affordable housing and education.

## **How do we know that an Interim Statement is appropriate?**

- 1.13 The Council is already being approached by housing developers on sites around the city as they look towards their future development plans. The Strategic Housing Land Availability Assessment (SHLAA) which is currently being finalised examines the potential for future housing provision. The Council will be required to ensure that we have the potential for 15 years supply and early indications show that we are able to meet that provision. Recent viability work on the sites which have been proposed (by landowners and developers) indicates that there is the potential. However current policy constraints in the Local Plan will limit these coming forward until the Core Strategy and Allocations documents are adopted. Preparing Interim guidance on how these sites may come forward would prevent delay imposed by the preparation of the new Development Plan.
- 1.14 The recent application at Crindledyke north of the City is already a case where the lack of deliverable supply of new housing was one of the factors in favour of that development. Providing guidance to deal with applications under circumstances such as this will help provide clarity as this was the first instance where housing supply was considered in detail since the restrictive planning supply positions in 2005.

## **What the statement will not do?**

- 1.15 The Interim Statement will not specifically allocate sites for development. This would effectively be developing new policy and it would be inappropriate to designate land ahead of an Allocations document and appropriate consultation on individual sites. It therefore has to provide Interim guidance on how the Council will deal with applications coming forward for housing in the absence of a five year supply.

## **Monitoring & Review**

- 1.16 The policy will apply to all residential planning applications submitted on or after 1 April 2012. The policy may also be used as evidence to support any appeal challenges to decisions made where the planning application was submitted before this date.
- 1.17 The impact of the interim policy on housing supply will be regularly reviewed in accordance with the requirement in PPS3 to plan, monitor and manage the release of housing land.

- 1.18 The interim policy will remain relevant guidance until the Council is able to pursue a plan led approach to housing provision through the LDF.
- 1.19 The draft Interim Planning Statement – Housing is attached at appendix 1

## **2. CONSULTATION**

### **2.1 Consultation to Date.**

No consultation has been undertaken to date

### **2.2 Consultation proposed.**

As this statement is not part of the LDF, there are no statutory consultation requirements. However consultation does add weight to any considerations and it is the intention that any Interim Statement is a Material Consideration for planning applications. It is therefore intended to consult a range of bodies, including agents and developers, on this draft policy. It is proposed that a four week consultation on this statement is undertaken and reported back to Executive. Economy and Environment Overview and Scrutiny Panel will also be consulted to ensure Member involvement in the process.

## **3. RECOMMENDATIONS**

It is recommended that Executive approve the draft interim planning statement for housing for consultation as outlined in this report. A further report on the results of the consultation be brought back to Executive.

## **4. REASONS FOR RECOMMENDATIONS**

In order to address the current deficiencies in the 5 year supply of new housing Executive are requested to approve a draft IPPS for consultation with appropriate bodies.

## **5. IMPLICATIONS**

- Staffing/Resources – Any actions arising from this report will be accommodated within the resources of the planning teams.
- Financial – There are no financial implications arising

- Legal – The Interim Planning Statement is not viewed as being part of the Planning Policies reserved to Full Council by Article 4 of the Constitution given its interim status. However, from a legal and planning perspective, the document becomes more robust, in terms of challenge, the more consultation it has been subject to and buy-in by elected Members. The planned route for the document provides that it be consulted upon and its ultimate referral to Council, through the Executive, ensures that the document has the fullest backing possible by the elected Members of the Council.
- Corporate – An interim planning statement would help to deliver growth and support the Council’s corporate objectives
- Risk Management – Without this planning statement there is a risk that new housing could be determined by planning appeals without appropriate guidance on relevant planning issues
- Environmental – Environmental considerations would be taken into account when considering any planning applications brought forward
- Crime and Disorder – Not/applicable
- Impact on Customers – The proposed draft policy would help improve the quality of advice to customers
- Equality and Diversity – No Equality and Diversity issues arise

**Impact assessments**

**Does the change have an impact on the following?**

<b>Equality Impact Screening</b>	<b>Impact Yes/No?</b>	<b>Is the impact positive or negative?</b>
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Does the policy/service impact on the following?		
Age	No	
Disability	No	
Race	No	
Gender/ Transgender	No	
Sexual Orientation	No	
Religion or belief	No	
Human Rights	No	
Health inequalities	No	
Rurality	No	

**If you consider there is either no impact or no negative impact, please give reasons:**

This report relates to the development of a proposed IPPS. The policy statement would apply to all applications in a uniform manner.

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**If an equality Impact is necessary, please contact the P&P team.**

**Draft  
Interim Planning Policy Statement  
for New Housing Development in Carlisle**

In the absence of a 5-year supply of housing land as defined by PPS3, the Council will consider proposals for new housing development on land currently excluded from housing development either through other designated use or outside existing settlement boundaries against the following set of criteria:

- a) sites in Carlisle, Brampton or Longtown within the urban fringe should adjoin the edge of the existing built up area or
- b) sites in Local Service Centres should adjoin an existing settlement boundary, and
- c) it should be well related to the built framework of the existing settlement, and
- d) it should not result in a prominent intrusion into the countryside, and
- e) it should not result in settlements merging, and,
- f) it should not detract from the landscape character of the area as contained in the Cumbria Landscape Strategy; and
- g) it should not cause harm to some other overriding policy objective.

Proposals must be in line with the Council's emerging Core Strategy once it has reached Preferred Options stage.

Note: This interim policy supplements the saved housing policies of the Carlisle District Local Plan 2011-16 and should only be used in the absence of a 5-year supply of housing land. This policy does not supersede all saved policies in the Local Plan and should be interpreted in conjunction with them.

Adopted xxxxx 2012