

St Cuthbert's Garden Village  
Civic Centre  
Rickergate  
Carlisle  
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SENT BY EMAIL  
stcuthbertsgv@carlisle.gov.uk  
10/09/2018

Dear Sir / Madam,

## **ST CUTHBERT'S GARDEN VILLAGE CARLISLE: CONCEPT AND VISIONING CONSULTATION**

Thank you for consulting with the Home Builders Federation on the St Cuthbert's Garden Village Concept and Visioning consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The HBF wish to make the following brief comments upon the scope and vision for the St Cuthbert's Garden Village. The HBF will provide a more detailed response at later stages of the plan preparation process. The Council is encouraged to engage with the industry to ensure that the concepts proposed are realistic, achievable and viable. The HBF and our members can often provide valuable information and experience with regards to the collection of evidence and information.

### **Garden Settlement Principles and Policies**

The HBF supports the identification of a need for a mix of locally distinctive high-quality homes as part of the principles for the Garden Village.

The HBF recognise the value of well designed, quality buildings; low carbon living; and lifetime neighbourhoods it is, however, important that any policy related to these principles is not overly prescriptive and does not place undue burdens upon development. This is required to ensure that development remains viable and the industry can react to local site and market conditions at the time of the development.

### **Locally Distinctive**

The HBF generally support the aspiration to make St Cuthbert's a desirable place to live and work, drawing upon Carlisle's local character. However, the Council will need to ensure that realistic and achievable ambitions are set so that the general public do not expect more than can viably delivered.

The HBF note the Council's intention to find innovative ways to engage and support local builders and developers.

### **Quality Homes & Lifetime Neighbourhoods**

The HBF understands the intention to create a mixed and balanced community by providing a variety of dwellings size, tenure, cost and housing types. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

The HBF has some concerns in relation to the aspiration to deliver homes designed to the latest environmental best practice and what that will mean in terms of a detailed policy.

### **Smart & Sustainable Living**

The HBF generally support sustainable development. The HBF are content for the Council to support the use of new building, technologies and environmental practices along with, low carbon and energy secured living, however, the HBF would have concerns if this becomes a policy requirement. The Council will be aware of the ministerial statement dated 25th March 2015. This statement sets out that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations.

### **Land Ownership & Viability**

The HBF are pleased to note that the Council has met with major landowners and would encourage the Council to continue to work closely with landowners, developers and other key stakeholders to deliver the development and infrastructure needed for St Cuthbert's.

The HBF would encourage the Council to continue to consider the potential viability of development as the policies come forward. The HBF have concerns that if policy requirements are too onerous development will not come forward. The Council will also need to balance the capture of land value of uplift with ensuring that land owners are still willing to sell the land.

### **Concept Proposals**

As with other areas the HBF would encourage the Council to work with landowners and developers to ensure that the most appropriate spatial approach is utilised and that homes are delivered. This may mean considering alternate approaches from those currently set out in this document.

**Future Engagement**

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the progress of this document. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Harding', with a stylized flourish at the end.

**Joanne Harding**

**Local Plans Manager – North**

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