

## **Inspector's further Question to the Council**

I thank the Council for its responses (dated 24 & 31 July 2015) to my Initial Questions.

As you know, the National Planning Policy Framework confirms that to be positively prepared, the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. It requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

I have carefully considered the Council's responses. I note the decision of the Secretary of State you refer to, dated January 2015 (APP/R0660/A/13/2209335), which would have been determined on the basis of the evidence and matters put to him there. However, it is general practice to apply the buffer to both the base target and the shortfall when establishing the total 5-year housing supply requirement in order to ensure that the buffer serves the same purpose (of flexibility of "brought-forward" land supply) for the totality of the 5 year requirement, i.e. including any provision to address that shortfall. There are examples from around the country (examination reports as well as appeal decisions), with perhaps one of the more recent examples being the report to Cheshire West and Chester Council (whose Plan is now adopted on this basis).

Policy SP2 confirms that sufficient land will be identified to support the delivery of an annualised average of at least 565 net new homes to ensure that objectively assessed development needs are met. Assuming that a buffer of 5%, rather than 20% is correct, then scenario 5 would appear at this stage to be the most appropriate calculation to be applied. On this basis, it appears that the Council cannot demonstrate a five year supply of housing, with only 4.48 years supply identified.

I note that the Council suggest that land availability in itself is not the issue in Carlisle and that instead it is the capacity of the industry which is constraining the extent to which land can be considered 'deliverable'. However, I am concerned that if the Council are unable to demonstrate a five year housing land supply, then the plan cannot be considered to be positively prepared and thus sound.

The analysis of objectively assessed need contained within the SHMA (EB002) supports a housing target in the region of 480 to 565 homes per annum moving forward from 2013. If assessing 5 year housing land supply against the lower target, it is my understanding that the Council considers it can demonstrate a five year supply of housing land, scenario 1 being relevant. However, this range is based on past demographic trends and, unlike the higher target, does not take into account the likely housing requirements to meet an Experian job growth forecast. The higher requirement therefore appears to be preferable not only as it aligns with job growth forecasts but it will yield a higher proportion of affordable housing.

Given my concerns and before the examination proceeds any further, I am inviting the Council's view on how it wishes to address the shortfall in the 5 year housing land supply, taking all of the

above into account. It would be helpful if the Council could indicate its proposed timetable for carrying out the additional work on this matter’.

A response within 14 days would be appreciated.

Claire Sherratt

Inspector appointed to examine the Carlisle Local Plan

13 August 2015