

## **Economic Development**

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Inspector Mrs C Sherratt  
(via Programme Officer)

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**Your ref:**  
**Our ref:** 026-PS004

26 August 2015

Dear Mrs Sherratt,

### **Examination of Carlisle District Local Plan (2015 – 2030): Demonstration of Five Year Housing Land Supply**

I write further to your correspondence dated 14<sup>th</sup> August 2015 relating to the above. The concerns you raise are duly acknowledged and accepted. As such, on the basis of calculating supply in the manner you advocate, the Council would, upon adoption of the Plan as drafted, be unable to demonstrate a five year housing land supply.

Having considered the Council's position I am confident that the concerns raised can be overcome through modifying the Plan to introduce a stepped approach to housing delivery across its period. It is contended that such an approach would ensure that the plan could still be deemed to have been 'positively prepared' and therefore 'sound'. Supply, by way of reference to the evidence, would be brought on stream in a timely manner when needed in response to projected needs. By way of an indication (and without prejudice to further analysis which is ongoing) these projected needs can be seen to equate to, by way of reference to the Strategic Housing Market Assessment Update (2014) [Document library ref: EB002], an annual average of 477 dwellings (net of clearance) between 2013 and 2020, 633 between 2020 and 2025 and 616 between 2025 and 2030.

Importantly the suggested way forward would afford an opportunity for the development industry in the District to mobilise. This will be critical to realisation of the Plan's growth ambitions and is something that will take time to occur. It is also a preferable approach to identifying and allocating additional land at this time which, aside from the Council's well documented concerns about the effectiveness of this as a solution, could result in a significant delay contrary to the interests of expedient plan making.

It is considered that the above could easily be achieved by way of a modification to Policy SP2. Given that the overall quantum of housing planned for would remain unchanged

and that the Plan's overarching vision would not be compromised in any other way, it is contended that the necessary modification would fall within the realms of what can be legitimately achieved through a main modification within the context of an Examination.


In order to provide the necessary assurances regarding the soundness and legitimacy of the suggested way forward, the Council propose to prepare a concise paper which comprehensively details how a stepped housing delivery target would work. As part of this it would be made clear how the available evidence wholly supports the suggested approach and how it can actually be seen to be more responsive to Carlisle's circumstances. The precise nature of the modifications necessary to the Plan would be set out and revised land supply assessments and an updated trajectory would also be provided. Evidence of the efforts underway to attract and assist further developers to Carlisle will be provided and any consequential implications for monitoring made clear. These latter two regards are acknowledged as important in ensuring that there can be genuine confidence surrounding an 'uplift' in delivery in the years ahead and realistic interventions if not.

Whilst the Council will endeavour to complete this additional work as soon as practically possible it is considered that it will be done so no later than the end of September 2015.

Aside from the above the Council are still actively progressing the additional work outlined in my letter to you dated the 24<sup>th</sup> July. As indicated in an email to you on the 21<sup>st</sup> August, however, it is considered, in light of the above, to withhold submitting suggested modifications to the Plan for the time being. In the interests of avoiding confusion I propose to forward modifications across in one as opposed to on an ad-hoc basis before the close of September. This approach will enable modifications from the above work to be included as well as any forthcoming from the additional work on wind turbines, retail thresholds and those consequential to the recent court ruling on the PPG (as far as it relates to affordable housing and planning obligation thresholds).

I trust that the above provides clear direction of the Council's way ahead. Please simply advise if additional clarification is required at this stage or if any of the above causes immediate concerns.

Yours sincerely,

A handwritten signature in black ink that reads "Garry Legg". The signature is written in a cursive, slightly slanted style.

**G Legg**

Investment & Policy Manager

**Economic Development**

cc. Tony Blackburn, Programme Officer