

FIVE YEARS HOUSING LAND SUPPLY

POSITION STATEMENT - AS OF 31 April 2013



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CARLISLE
CITY COUNCIL



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INTRODUCTION

This statement sets out the housing land supply position as at 31 March 2013. The Carlisle District Local Plan 2001-16 was adopted in September 2008 and sets out housing land allocations. The Local Plan allocations are however based on the Structure Plan supply of 315 per annum for the District.

On 6th July 2010 the Secretary of State announced the government's intention to revoke Regional Spatial Strategy (RSS) Housing targets. However CALA Homes challenged this decision and it was upheld that revocation was unlawful and RSS remains in place. In light of this it was recommended and approved by the Executive of Carlisle City Council on 18 April 2011 to continue with the RSS figure of 450 net dwellings per year to be used when assessing planning applications.

The Council embarked on The Core Strategy and consulted on the "Key Issues" and "Issues and Options" in 2011. It was expected that the Site allocations DPD would be produced after the adoption of the Core Strategy which was programmed to be early 2014.

However following the introduction of the National Planning Policy Framework (27 March 2012) a Local Plan will now be produced which will include site allocations. The practical implication of this is that the work being undertaken on the Site Allocations and Development Management Policies has been brought forward to enable the simultaneous production of previously separate documents and is due to be consulted upon this summer.

EVIDENCING A 5 YEAR SUPPLY

BACKGROUND

The National Planning Policy Framework under "Delivering a wide choice of high quality homes" states:

Paragraph 47 (second Bullet point) states: *"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;"*

The associated footnote relating to the above statement states:

"To be considered deliverable, the sites 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 and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."

Paragraph 48 states: “Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

METHODOLOGY

Annual Requirement

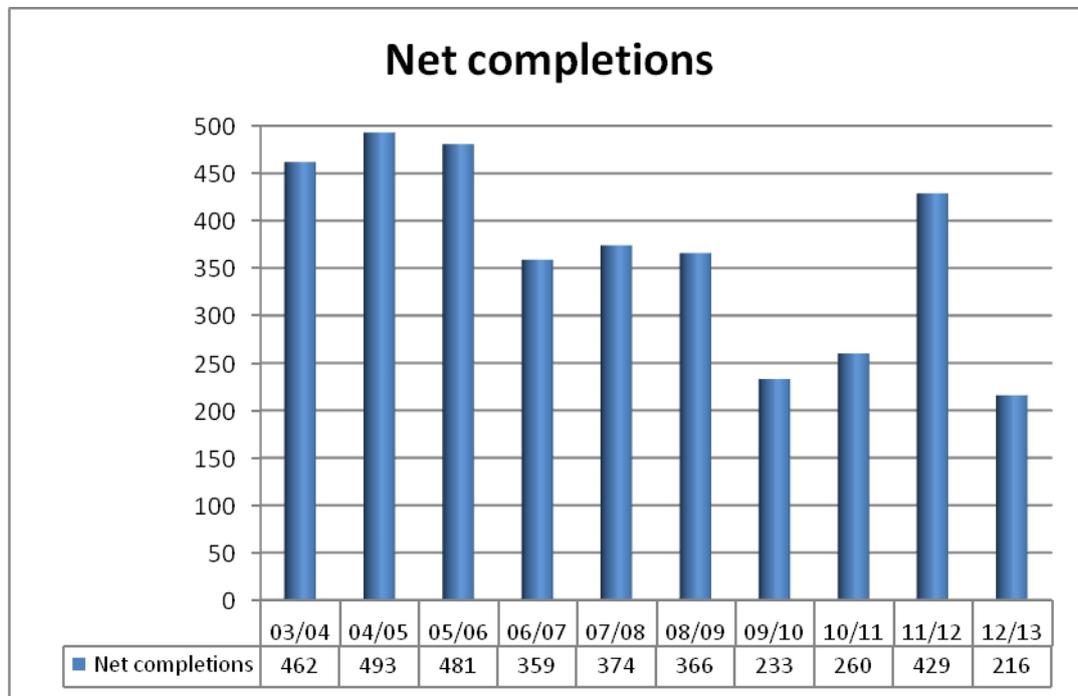
On 18th April 2011 the Executive of Carlisle City Council elected to maintain the RSS figure of 450 dwellings per annum which had been in place since 2003. The 5 year requirement is therefore 2,250 dwellings (5 x 450).

Buffer Requirement

There is a requirement for a 5% (equivalent to 112 dwellings) additional buffer unless there has been a record of persistent under delivery of housing when it should be increased to 20% (equivalent to 450 dwellings).

Persistent Under Delivery – In the absence of formal guidance the Council’s interpretation, which is felt to be realistic, is that when there have been 3 consecutive years of under delivery which results in an overall shortfall over the previous 5 years of 10% ($2250 \times 10\% = 225$). This will trigger a change in the Buffer Requirement to 20%.

Current Position



Since 2006/07 (7 years) there has been an annual shortfall in delivery of target of 450 per annum which cumulatively equates to 827 dwellings. This is deemed to be “persistent” therefore an additional 20% will be required being the equivalent of 90 dwellings per annum (5 years = 450 dwellings).

Current 5 Year Requirement

Annual Requirement x 5 + Buffer = 2250 + 450 = 2700 dwellings.

Calculating the 5 Year Supply

In line with the guidance **Sites with Planning Permission** will be considered to be deliverable unless there is clear evidence that they will not be delivered within that timescale. The Council has taken the view that a further 5% of permissions remaining after being adjusted for known non delivery will expire and will not contribute to the delivery of housing.

Current Allocated Sites will be expected to contribute to the 5 year supply unless there is clear evidence that they will not come forward within that timescale so are excluded from the calculation. The Council also understands that there will be time lapse in the remaining allocated sites being delivered so only 80% of these will be taken into account.

Strategic Housing Land Availability Assessment (SHLAA) – As part of the evidence base for the Local Plan the council has undertaken a SHLAA. This provides an indication of the potential delivery of housing on a number of sites throughout the district. The SHLAA does not however allocate land nor does it give it planning permission. Until the sites have attained further planning status they will not be included in the contribution towards housing supply. Sites will be taken into account once the Local Plan has provided an indication of future land allocations.

Raffles – In the past the Council has excluded delivery on this site as they were replacement dwellings as defined within PPS 3. As PPS 3 was listed in Appendix 3 of the National Planning Policy Framework (NPPF) as being replaced by this Framework and the demolitions date back to 1999 with the initial Planning Permission to 2001, well before the introduction of the NPPF, then any new development on the site will count towards the 5 year supply.

Windfall – a figure of 50 per annum was evidenced for the Carlisle District Local Plan 2001 – 2016. Windfall sites make a significant contribution to current delivery (318 in year 2011/12 i.e. 74%; 110 in year 2012/2013 i.e. 51%). Therefore an allowance for the evidenced windfall figure of 50 per annum (which is significantly lower than actual) will be made within the calculation.

Current Baseline Position

	Urban	Rural	Total
Annual Requirement	360 pa	90 pa	450 pa
Net O/S Planning	3075	396	3471
Years Supply	8.54 yrs	4.4 yrs	7.71 yrs
Allocated Sites	793	6	799
Total Unit Potential	3868	402	4270
Years Supply (without buffer)	10.74 yrs	4.47 yrs	9.49 yrs

On this basis there is a 9.49 year supply of housing. However these figures need to be adjusted for known/anticipated non-delivery, phasing and windfall allowance.

Adjusted Position

Appendix 1 is an analysis of deliverable sites.

This gives an overall figure of 2,774 dwellings which equates to **6.16 years supply** and against a figure of 2,700 gives **102.7%** of requirement.

CONCLUSION

There is sufficient supply of specific deliverable sites to provide five years worth of housing to meet the housing requirement of 450 dwelling per annum with an additional buffer of 20%.

APPENDIX 1

	Permissions	Comments
Net Planning Permissions Outstanding	3471	
Permissions unlikely to be Developed		
Rome St 2	-49	Contamination issues, however material start has been made
Westrigg/Wigton Rd	-30	Dormant Site
South Henry Street	-23	Developer not progressing
Adj Suttle House	-41	Stalled site which has a revised application for a Care Home
Adjustment for Phasing		
Morton	-570	1 st phase delivery of 255 out of 825
Crindledyke	-666	1 st phase delivery of 184 out of 850
Permissions with Authority to Issue		
SW Terrace	99	Developer wanting to conclude negotiations and S106 is expected to be signed within the next few months
Hadrian's Camp	96	Indicative figure given for Education Contribution
Net Planning Permissions	2,287	
Less 5% for non-delivery	-114	
Adjusted Net Planning Permissions	2,173	
ALLOCATED SITES	799	
Sites unlikely to be developed		
Hilltop	-80	No Current Interest
St Nicholas	-50	No Current Interest
Rome Street 1	-98	Contamination Issues
Brisco	-132	Contamination Issues
Net allocations	439	
Less 20% for delayed delivery	-88	
Adjusted Net Allocations	351	
SUMMARY		
Planning Permissions	2,173	
Allocations	351	
Windfall	250	
5 Year Delivery	2,774	Target 2,700