

# FIVE YEARS HOUSING LAND SUPPLY

## INTERIM POSITION STATEMENT Published 31 December 2013



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CARLISLE  
CITY COUNCIL



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## INTRODUCTION

This statement sets out the housing land supply position as at 30 September 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 6<sup>th</sup> 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 was consulted on from July to September this year.

The evidence base which underpinned Housing Policy 19 within the draft Carlisle District Local Plan 2015 to 2030 requires an annual figure of 665 to support the aspirational growth agenda for the District.

## 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 18<sup>th</sup> 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 split between Urban and Rural is 80/20.

The Draft Carlisle District Local Plan 2015 to 2030 requires 665 dwelling per annum which will support the Growth Agenda for the District. If adopted, the split between Urban and Rural will change to 70/30.

The 5 year supply will therefore be a combination of these two targets being 450 per annum from 2013 to 2015 and 665 from 2015 to 2018.

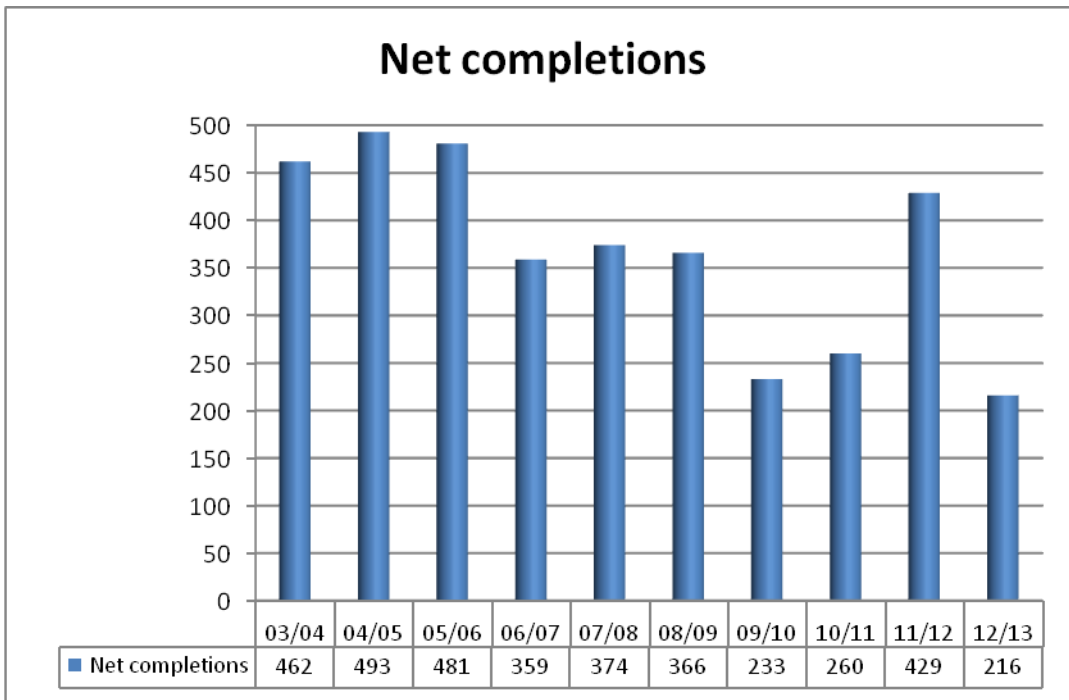
### Buffer Requirement

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

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%. This will trigger a change in the Buffer Requirement to 20%.

### Current Position

As seen below, since 2006/07 (7 years) there has been an annual shortfall in delivery of target of 450 per annum which is more than the requisite 3 years. The cumulative shortfall over the last 5 years equals 746 dwellings. This is deemed to be “persistent” therefore an additional 20% buffer will be required. Delivery for the first half of 2013/14 was 58 which does not meet target



### 5 Year Requirement

2013/14 = 225 [second half of year]  
 2014/15 = 450  
 2015/16 = 665  
 2016/17 = 665  
 2017/18 = 665  
 2018/19 = 332 [first half of year] total 3,002 dwellings

Split between Urban and Rural will be:

**Urban** requirement will be 360 per annum from 2013 to 2015 and 466 from 2015 to 2018 making a total of **2,171**

**Rural** requirement will be 90 per annum from 2013 to 2015 and 199 from 2015 to 2018 making a total of **831**

**5 Year Requirement = 3,602** (including 20% buffer of 600 due to persistent under delivery)

### Backlog

The question of backlog was discussed at a compliance meeting with the Inspectorate in September 2013. On their advice it was agreed that backlog could be limited to that accrued since the adoption of the current Local Plan and spread across the term of the next plan as under delivery was not primarily due to lack of permissions and/or land availability, but to the restricted number of active developers in the District.

The backlog from April 2008 to September 2013 is 893 across the District. The Urban area accounts for 725 of these being 97% and in the Rural area 21 being 3%.

**Urban Backlog:**  $827/16.5$  [years 2013 – 2030] = 47 per annum - 5 years backlog = 236  
**Rural Backlog:**  $66/16.5$  [years 2013 – 2030] = 4 per annum - 5 years backlog = 20

Total 5 year Requirement

**3,602 plus backlog [236 + 20] = 3,858**

**Strategic Housing Land Availability Assessment (SHLAA)/Proposed site Allocations**

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. The Draft Carlisle District Local Plan 2015 – 2030 Preferred Options which has included site allocations has been consulted on from July 29<sup>th</sup> 2013 to 16 September 2013. A further second stage consultation is due to take place in March 2014.

As this interim 5 year supply statement is taking into consideration the forthcoming targets proposed in the Local Plan then a relevant proportion of the proposed allocations will be expected to contribute to the 5 year supply. Therefore the proposed allocations that include existing ones to be carried forward into the next Plan, a proportion of the allocations will be used within this assessment i.e. total allocations divided by 16.5 years x 5.

**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 will remain until the adoption of Carlisle District Local Plan 2015 to 2030 when the figure will be revised to 100. Therefore windfall will be at 50 per annum for 1.5 years and 100 for 3.5 years.

## Current Baseline Position

	Urban	Rural	Total
Basic 5 year requirement 2013 to 2018	2,171	831	3,002
Net O/S Planning	3,023	496	3,519
<b>Supply</b>	<b>139.2%</b>	<b>59.7%</b>	<b>117.2%</b>

On this basis whilst there is disparity between the Urban and Rural supply, overall there is an oversupply of existing planning permissions to deliver the required housing. However the requirement needs to be adjusted to take account of the required 20% buffer and backlog and the delivery needs to be adjusted for known/anticipated non-delivery, phasing and include the site allocations and proposed windfall allowances.

## Adjusted Position

	Urban	Rural	Total
Basic 5 year requirement 2013 to 2018	2,171	831	3,002
20% Buffer	434	166	600
Backlog	827	66	893
<b>Adjusted 5 year requirement</b>	<b>3,432</b>	<b>1,063</b>	<b>4,495</b>
Net O/S Planning	3,023	496	3,519
	88.1%	46.7%	78.3%
<b>5 year Supply (appendix 1)</b>	<b>3,434</b>	<b>1,366</b>	<b>4,800</b>
<b>Supply against adjusted requirement</b>	<b>100%</b>	<b>128.5%</b>	<b>106.7%</b>

## CONCLUSION

The City Council meets its overall 5 year supply requirement including a 20% buffer which has taken into consideration not only the current requirement but the proposed increase in housing target from April 2015.



## APPENDIX 1

	Permissions		Comments
	Urban	Rural	
<b>Net Planning Permissions Outstanding as at 01 Oct</b>	3,023	496	
<b>Permissions unlikely to be Developed</b>			
Rome St 2	-49		Contamination issues, however material start has been made
Westrigg/Wigton Rd	-10		PP for 30, now expected to be 20
Adj Suttle House	-41		Stalled site which has a revised application for a Care Home
<b>Adjustment for Phasing</b>			
Morton	-570		1 <sup>st</sup> phase delivery of 255 out of 825
Crindledyke	-666		1 <sup>st</sup> phase delivery of 184 out of 850
<b>Permissions with Authority to Issue</b>			
Broomfallen Road, Scotby		28	
Hadrian's Camp		96	Outline - Indicative figure
Beech Cottage, Cumwhinton		18	
Townhead Road. Dalston		121	
Former Dairy, Hollywell Crescent	66		Outline - Indicative figure
Land bounded by Hammonds Pond	318		
<b>Adjusted Net Planning Permissions</b>	<b>2,071</b>	<b>759</b>	
<b>Allocations</b>	<b>1,134</b>	<b>454</b>	Proposed allocations in Draft Plan excluding AUTI in first 5 yrs
<b>SUMMARY</b>			
Adjusted Planning O/S Permissions	<b>2,071</b>	<b>759</b>	
Delivery from Allocations	<b>1,091</b>	<b>454</b>	See draft local plan
Windfall	<b>272</b>	<b>153</b>	50 x 1.5yrs; 100 x 3.5 yrs 64% urban; 36% rural
<b>5 Year Supply</b>	<b>3,434</b>	<b>1,366</b>	Requirement 3,432 and 1,063