

FIVE YEARS HOUSING LAND SUPPLY

POSITION STATEMENT

01 October 2014



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CARLISLE
CITY COUNCIL



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INTRODUCTION

This statement sets out the current position with regard to the five year housing supply for the District which recognises the current position of the Council as it migrates towards the adoption of a new Local Plan

BACKGROUND

The requirement to undertake a 5 year assessment is set out in the National Planning Policy Framework which states that in order to boost significantly the supply of housing, Local Planning Authorities should:

Paragraph 47 (second Bullet point): *“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.”*

The Planning Practice Guidance gives further advice regarding 5 year land supply assessments including **“What is the starting point for the five-year housing supply?”**

The National Planning Policy Framework sets out that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. Therefore local planning authorities should have an identified five-year housing supply at all points during the plan period. Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.

Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints. Where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point, but the weight given to these should take account of the fact that they have not been tested (which could evidence a different housing requirement to the projection, for example because past events that affect the projection are unlikely to occur again or because of market signals) or moderated against relevant constraints (for example environmental or infrastructure).

The **Carlisle District Local Plan 2001-16** was adopted in September 2008 and sets out housing land allocations. The Local Plan allocations were 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 due to legal challenges prior to its formal revocation [December 2012] it was recommended and approved by the Executive of Carlisle City Council on 18 April 2011 to continue with the previous RSS figure of 450 net dwellings per year which would be used when assessing planning applications.

The Strategic Housing Market Assessment Update – September 2014 by J G Consulting, updated The Housing Needs and Demand Study – November 2011 by GL Hearn and Justin Gardner Consulting, and objectively assessed the current housing needs within the District using the most up to date population figures and projections.

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.

Following the introduction of the National Planning Policy Framework (27 March 2012) a Local Plan is now being produced and includes 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 into one single Local Plan. A Preferred Option consultation took place between 29 July and 16 September 2013 with a Stage Two consultation between 10 March 2014 and 4 April 2014. Consultation in accordance with Regulation 19 [Publication] of the Town and Country Planning (Local Planning) (England) Regulations 2012, on the proposed submission draft of the Carlisle District Local Plan 2015 – 2030 [subject to full Council approval] is anticipated to take place in February to March 2015.

Based on current circumstances with regards to where Carlisle is in the migration towards the New Local Plan and the stage within the preparation process it is at, it is considered appropriate to set out a number of assessments as follows:

1. 5 year supply based on the most up to date adopted Housing Target by the Local Authority
2. 5 year supply based on the most up to date objectively assessed Housing Needs

EVIDENCING A 5 YEAR SUPPLY

METHODOLOGY

Annual Requirement

Annual average delivery will be based upon either:

1. The current adopted Housing Target adopted by the Local Authority - 450 net new homes per annum
2. The range of targets recommended by the Strategic Housing Market Assessment - 480 to 565 net new homes per annum

Base Date

This will be determined within each of the separate assessments.

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%.

The Planning Guidance looks at the issue of under supply:

The approach to identifying a record of persistent under delivery of housing involves questions of judgment for the decision maker in order to determine whether or not a particular degree of under delivery of housing triggers the requirement to bring forward an additional supply of housing.

The factors behind persistent under delivery may vary from place to place and, therefore, there can be no universally applicable test or definition of the term. It is legitimate to consider a range of issues, such as the effect of imposed housing moratoriums and the delivery rate before and after any such moratoriums.

The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.

Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.

With respect to the duty to co-operate, it was established that with respect of Housing Targets - The Strategic Housing Market Assessment identified that there were no shared housing market areas within Cumbria. Each District will therefore meet its own housing target.

Forward Land Supply

The forward land supply consists of:

- Extant Planning Permissions

- Planning Permissions that have 'Authority to Issue' awaiting S106 agreement to be executed.
- Housing Site Allocations
- An allowance for small site/windfall completions

An assessment of the contribution made from each of these sources has been made when producing the statement.

Summary of Housing Land Supply (as at 1st October 2014)

Source	No. Of Dwellings
Outstanding Planning Permissions ¹	4,063
Proposed Local Plan Allocations ²	3,472
Windfall Provision [@ 100 dwellings per annum across the plan period]	1,500
Strategic Allocation – Carlisle South	1,450
Total Supply	10,485

Appendix 1 is a site by site breakdown of how they will contribute an annual basis over the plan period.

Small Site/Windfall Completions

Over the last few years, these sites have made a significant contribution towards the housing completions as evidenced below:

Year	Total net completions	Allocated Comp	Windfall comp	% windfall
08/09	366	172	194	53%
09/10	233	98	135	58%
10/11	260	86	174	67%
11/12	429	111	318	74%
12/13	216	106	110	51%
13/14	190	64	126	66%
Totals	1,694	637	1,057	62%
Average			176 p.a.	

The site allocations of 0.4 Ha or more are spread throughout the District within the proposed pre-submission draft of the Carlisle District Local Plan 2015 – 2030. The strategy taken is expected to reduce the delivery on non- allocated sites as whilst there is a concentration in the Urban Area of Carlisle many are spread across the rural area of the District. However small and un-allocated sites will continue to contribute to delivery within the plan period especially within the rural area. The figure proposed and taken forward is lower than the average over the last 6 years at 100 per annum. Small site/windfall completions will continue to be carefully monitored and if necessary assumptions reviewed.

ASSESSMENT ONE

¹ Includes 81 units awaiting execution of S106's agreements

² Excludes the capacity of those allocations which have an outstanding planning permission in place in order to avoid double counting.

Current Adopted Housing Delivery Target

Annual Requirement

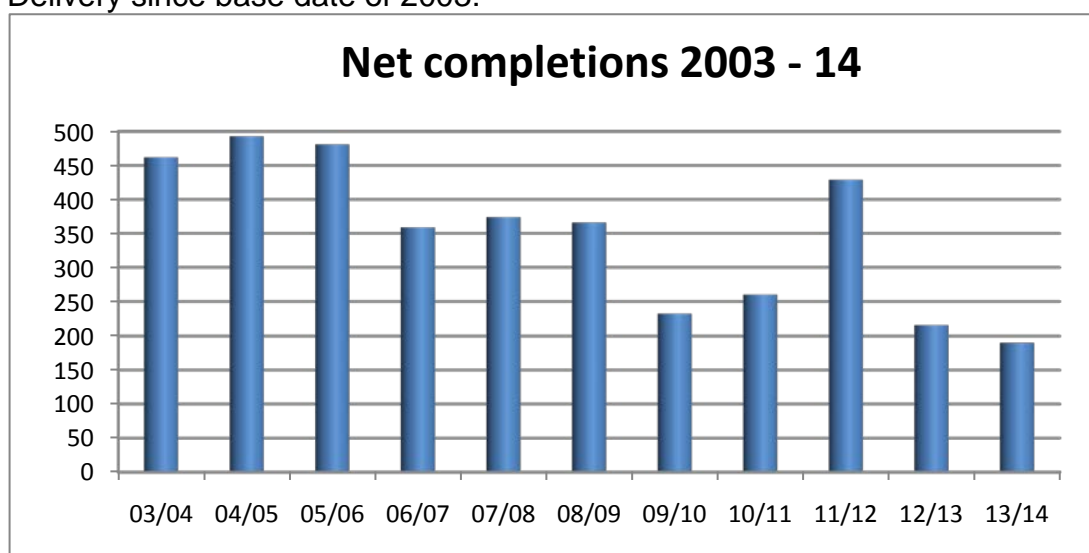
On 18th April 2011 the Executive of Carlisle City Council elected to maintain the previous RSS figure of 450 dwellings per annum.

Base Date

The previous RSS figure was adopted in 2008 and related to a plan period of 2003 to 2021. Therefore 2003 is the base date for the calculation.

Buffer Requirement

Delivery since base date of 2003:



	Target	Net Delivery	Surplus/Shortfall	Cumulative
2003/04	450	462	12	
2004/05	450	493	43	55
2005/06	450	481	31	86
2006/07	450	359	-91	- 5
2007/08	450	374	-76	-81
2008/09	450	366	-84	-165
2009/10	450	233	-217	-382
2010/11	450	260	-190	-572
2011/12	450	429	-21	-593
2012/13	450	216	-234	-827
2013/14	450	190	-260	-1087
	4,950	3,863		

This is deemed to be “persistent” therefore a **20% buffer will be required.**

Forward Land Supply

Requirement 2015 - 2020	
Annual requirement	450
Base requirement (5 x 450)	2,250
Buffer @ 20%	450
Backlog between 2003 and 2015	1,428
Total Requirement	4,128
Forward Land Supply to 2020	
Quantified net deliverable supply to 2020 [3547 less 109 delivered April – September 2014]	3,438
Balance	
Requirement less forward supply (4,128 - 3,438)	-690

Of the 10,485 total land supply, 3,438 dwellings are expected to be delivered [see appendix 1] by 2020. This equates to **7.64 years supply** against an annual target of 450 per annum [excluding backlog and buffer]

Once the backlog is factored in to account for previous under delivery, and an allowance is made for the required buffer, the assessment shows that there is a shortfall of some 690 dwellings. The preferred approach regarding backlog in the Planning guidance is that it met within the first 5 years of the Plan. Taking this into consideration the expected delivery will be 83% of the requirement which equates to **4.2 years supply** [including backlog and buffer].

Accounting for backlog in the manner described can be seen to be entirely unrealistic as it results in an annualised average of 825 dwellings net of clearance, a rate which has never been delivered within the District; which is beyond the capacity of the industry to deliver in the District; and which far exceeds even the most optimistic scenarios of need and demand within the District. It is considered that there are clear circumstances to support delivery of the backlog over a longer period of time and the 15 years which mirrors the emerging plan period would be reasonable. An assessment on this basis is set out below and a five year land supply can be demonstrated including the required buffer. Expected delivery will be 108% of the requirement which equates to **5.4 years supply**.

Requirement 2015 - 2020	
Annual requirement	450
Base requirement (5 x 450)	2,250
Buffer @ 20%	450
Proportion of Backlog between 2003 and 2015 [1,428/15 x 5]	476
Total Requirement	3,176
Forward Land Supply to 2020	
Quantified net deliverable supply to 2020 [3547 less 109 delivered April – September 2014]	3,438
Balance	
Forward supply less requirement (3,438 - 3,176)	+ 262

Assessment One Conclusion

The District can be seen to have a five year land supply under the assumptions employed with regards to assessment one, on the basis however that previous backlog is spread over a longer term horizon - an approach considered entirely justified in the circumstances.

ASSESSMENT TWO

Objectively Assessed Housing Need [2014]

Annual Requirement

The Sept 2014 Strategic Housing Market Assessment concludes that an objective level of need for the District of Carlisle sits somewhere in the range of 480 to 565 homes per annum. The lower figure is based on a reasonable demographic basis for need with the upper figure being based on a need to meet the Experian economic forecast.

Base Date

The Assessment has a base date of 2013 with the recommended targets having already been uplifted to account for under delivery prior to this date.

Scenario One

This scenario uses the Sept 2014 Strategic Housing Market Assessment lower figure of **480** average annual new dwellings which was based on a reasonable demographic basis for need.

Buffer Requirement

Delivery since 2013:

	Target	Delivery	Surplus/Shortfall	Cumulative
2013/14	480	190	-290	-290

The Planning Guidance says:

The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.

As only one year has elapsed it may be too soon to define “persistent”.

Therefore a 5% buffer will be applied as a historic longer term view can't be taken, and delivery trajectory [appendix 2] confirms under delivery will not be persistent.

Forward Land Supply

Requirement 2015 - 2020	
Annual requirement	480
Base requirement (5 x 480)	2,400
Buffer @ 5%	120
Backlog between 2013 and 2015	661
Total Requirement	3,181
Forward Land Supply to 2020	Total
Quantified net deliverable supply to 2020 [3547 less 109 delivered April – September 2014]	3,438
Balance	
Forward supply less requirement (3,438 - 3,181)	+ 257

Assessment Two - Scenario One Conclusion

The District can be seen to have a five year land supply under the assumptions employed with regards to assessment one.

Scenario Two

This scenario uses the Sept 2014 Strategic Housing Market Assessment upper figure of **565** average annual new dwellings which is based on the Experian jobs led forecast.

Buffer Requirement

Delivery since 2013:

	Target	Delivery	Surplus/Shortfall	Cumulative
2013/14	565	190	-375	-375

The Planning Guidance says:

The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.

As only one year has elapsed it may be too soon to define “persistent”.

As with Scenario one, a 5% buffer will we applied as a historic longer term view can't be taken, and delivery trajectory [appendix 2] confirms under delivery will not be persistent.

Forward Land Supply

Requirement 2015 - 2020	
Annual requirement	565
Base requirement (5 x 565)	2,825
Buffer @ 5%	141
Backlog between 2013 and 2015	831
Total Requirement	3,797
Forward Land Supply to 2020	
Quantified net deliverable supply to 2020 [3547 less 109 delivered April – September 2014]	3,438
Balance	
Forward supply less requirement (3,438 - 3,797)	-359

Of the 10,485 total land supply, 3,438 dwellings are expected to be delivered by 2020. This equates to **6 years supply** against an annual target of 565 per annum [excluding backlog and buffer]. The preferred approach regarding backlog in the Planning guidance is that it is met within the first 5 years of the Plan. Taking this into consideration the expected delivery will be 90.5% of requirement which is **4.5 years supply** [including backlog and buffer].

Accounting for backlog in the manner described can be seen to be entirely unrealistic as it results in an annualised average of 760 dwellings net of clearance, a rate which has never been delivered within the District; which is beyond the capacity of the industry to deliver in the District; and which far exceeds even the most optimistic scenarios of need and demand within the District. It is considered that there are clear circumstances to support delivery of the backlog over a longer period of time and the 15 years which mirrors the emerging plan period would be reasonable. An assessment on this basis is set out below and a five year land supply can be demonstrated including the required buffer. Expected delivery will be 106% of the requirement which equates to **5.3 years supply**.

Requirement 2015 - 2020	
Annual requirement	565
Base requirement (5 x 565)	2,825
Buffer @ 5%	141
Proportion of Backlog between 2013 and 2015 $[(831/15) \times 5]$	275
Total Requirement	3,241
Forward Land Supply to 2020	
Quantified net deliverable supply to 2020 [3547 less 109 delivered April – September 2014]	3,438
Balance	
Forward supply less requirement (3,438 - 3,241)	+ 197

Assessment Two - Scenario Two Conclusion

The District can be seen to have a five year land supply under the assumptions employed with regards to assessment two, with this outcome dependent however, with regards to scenario two, on the basis that previous backlog is spread over a longer term horizon - an approach considered entirely justified in the circumstances.

OVERALL CONCLUSIONS

- There is a degree of uncertainty with regards to the appropriate housing target upon which to base the five year land supply assessment, which reflects the migration from the existing Local Plan to the new Local Plan (which is not however yet at an advanced enough stage to attract significant weight).
- The statement has responded to this uncertainty by setting out a series of assessments which cover a range of scenarios.
 - The starting position for the assessment is considered to be the existing development plan target which the Council's Executive resolved to employ until replaced, but consideration is also afforded to the most up to date evidence of relevance in the form of the recommendations within an Updated 2014 Strategic Housing Market Assessment.
- The headline conclusions from the various assessments can be summarised as follows:

Assessment Reference	Base Annualised Housing Target	Buffer Applied	Under delivery spread over?	Land Supply in Years
A Assessment One	450	20%	5 Years	4.2
B Assessment One	450	20%	15 Years	5.4
C Assessment Two Scenario 1	480	5%	5 Years	5.4
D Assessment Two Scenario 2	565	5%	5 Years	4.5
E Assessment Two Scenario 2	565	5%	15 Years	5.3

- Key to whether the District has or does not have a five year land supply is whether previous under delivery is made good over the immediate five term future period or instead longer. In Carlisle local circumstances are considered to entirely justify employing a longer term approach to making good previous under delivery.
- **It can be seen from the above summary that regardless of which assessment or scenario is employed in terms of the base annualised housing target, the District can be seen to have a five year land supply.**
- Despite historic under delivery there are many encouraging signs within the District which support that delivery is set to improve significantly moving forward. In this regard it can be observed that the District has the highest number of new homes

with an approved planning permission in place for some years; activity levels on the ground and starts on sites are amongst their most buoyant for some years; and developer confidence and firm interest in the District are at their highest since pre-recession levels, testament to which is the emergence of a number of additional volume house builders now active within the District.

- In such circumstances land supply will continue to be carefully monitored and the Council's position reviewed where necessary.

APPENDICES

Appendix 1 – Site Delivery Analysis

	Total/ Potential	o/s at 31/08/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Allocated Sites with Planning Permission																		
Morton	825	825					15	35	35	35	50	50	50	50	50	50	50	50
Penguin	37	37	20	17														
Adj Alexander Drive, Durranhill (pt of Durranhill)	49	2	2															
Key Safety System	52	27				27												
Racecourse	42	42			10	10	10	12										
Nelson St	103	103							15	35	35	18						
Rome St 2	48	48										18	30					
Peter Lane/Dalston Road	103	103	10	35	35	23												
West Wigton Road	256	175	40	40	40	40	15											
Sawmill Longtown	74	38	10	18	10													
Potential Delivery on Allocated Sites With Permission			82	110	95	100	40	47	50	70	85	86	80	50	50	50	50	50
Allocated Sites without Planning Permission																		
Laings [U21]	50	50							15	35								
Remainder Morton Allocation [Land to SW of Cummersdale Grange Farm U17]	60	60										30	30					
Remainder Durranhill [U20]	70	70							15	35	20							
Deer Park [U16]	100	100						30	35	35								
Carleton Clinic [U14/19]	166	166				15	35	35	35	35	11							
Potential Delivery on Allocated Sites		1846	82	110	95	115	75	112	150	210	116	116	110	50	50	50	50	50

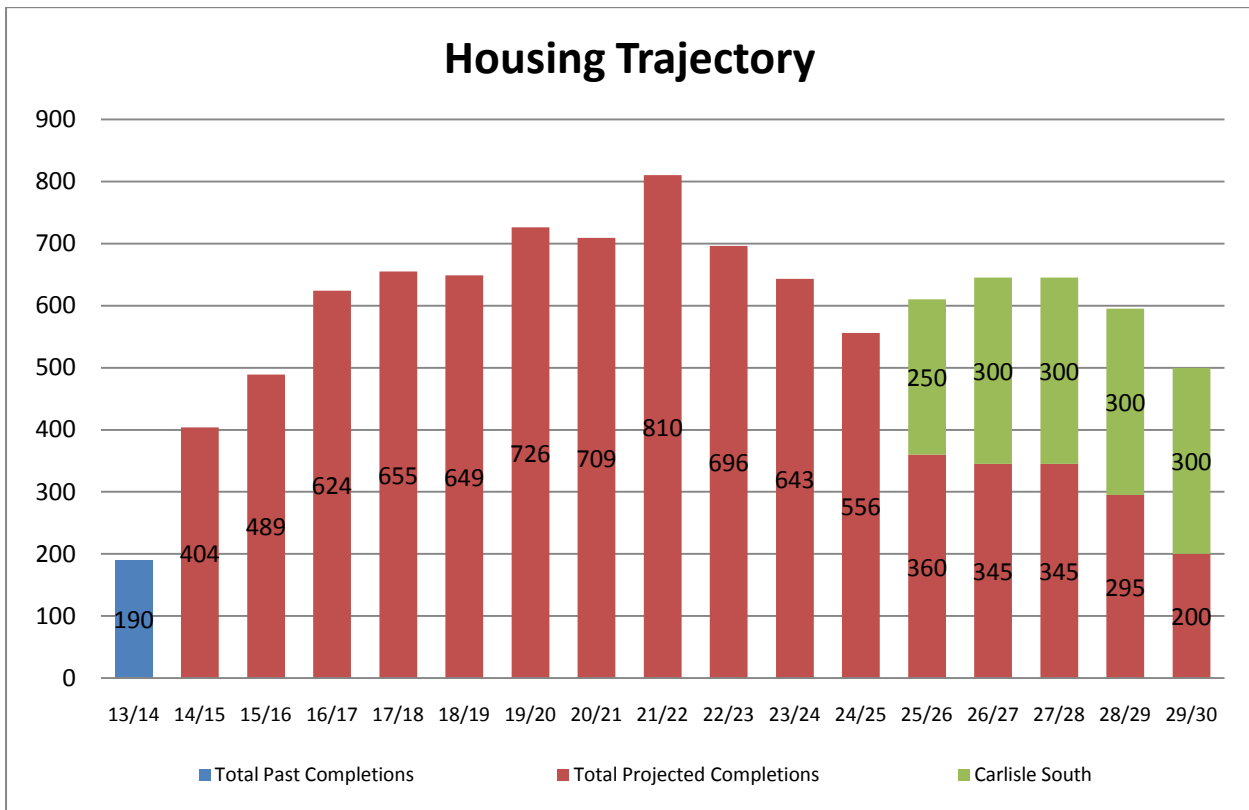
	Total/ Potential	o/s at 31/08/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Unallocated Sites with Planning Permission (over 10)																		
Raffles	345	201	25	35	35	35	35	36										
Raffles Ave & Dalton Ave	37	37	37															
Former Dairy Site, Botcherby [U15]	66	66				16	35	15										
Boreland Ave	11	11	11															
Ambulance Station	29	29	14	15														
Hassell Street	21	2	2															
Leabourne Road	13	13					4	9										
Hammonds Pond	318	318	20	35	35	35	35	35	35	35	35	18	0					
Prince of Wales	23	23	0	23														
Highgrove Dairy	96	58	10	15	20	13												
Arnside Court	10	10	10															
Cavaghan & Gray	14	14				14												
St Edmunds	14	8	8															
Crindledyke	850	805	30	40	40	50	50	50	50	60	60	60	60	60	60	60	60	15
St Augustines	42	42			42													
Grounds of Suttle House	41	41			15	26												
Scarbank, Netherby Rd	14	14				4	10											
Barns at Brackenhill Tower, Longtown	10	10				5	5											
Townhead Rd Dalston	121	121	16	35	35	35												
Kingswood, Cumdivock	10	7	1	1	1	1	1	2										
Stonehouse Farm	11	11			5	6												
Hadrians Camp, Houghton [R10]	99	99	0	10	35	35	19											
Scotby Steading	45	45	15	30														

	Total/ Potential	o/s at 31/08/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
former George Public House, Warwick Bridge	31	31	13	8	10													
Lime House, Wetheral	15	10	10															
Skelton House, Wetheral	15	15			15													
Potential Delivery on current large unallocated sites	2301	2041	222	247	288	275	194	147	85	95	95	78	60	60	60	60	60	15
Proposed New Allocations																		
R1 Land South of Carlisle Rd	250	250			15	35	35	35	35	35	35	25						
R2 land west of Kingwater Close	60	60									15	30	15					
R3 Land north of Greenfield Lane	140	140						20	35	35	35	15						
R4 Former Lochinvar School	106	106						15	20	20	20	20	11					
R5 Land to the south of Old Road, Longtown	61	61				11	30	20										
R6 Land West of Amberfield	25	25					5	20										
R7 Land east of Cummersdale Rd	14	14					7	7										
R9 land West of How Croft	20	20									10	10						
R11 Kingmoor Park Harker Estate	300	300							35	35	35	35	35	35	35	35	20	0
R12 Land East of Monkhill Road	10	10							5	5								
R13 Linstock North	10	10							5	5								
R14 Land at Tower	10	10					5	5										

	Total/ Potential	o/s at 31/08/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Farm																		
R15 Land off Hill Head	50	50										15	35					
R17 Warwick Bridge/Little Corby North	45	45							15	15	15							
R18 Land off Heads Nook Road	30	30										15	15					
R19 Wetheral South	60	60							20	20	20							
R20 Land west of Steel's Bank	40	40					20	20										
R21 Land west of Wreay School	10	10				5	5											
U1 land SE of J 44 Kingstown	217	217				15	35	35	35	35	35	27						
U2 Land North of California Rd	187	187										17	35	35	35	35	30	
U3 Site of Pennine Way School	112	112						22	35	35	20							
U4 land North of Moorside Drive/ Valley Drive	140	140								15	35	35	35	20				
U5 Land between Carleton Rd & Cumwhinton Rd	204	204		14	35	35	35	35	35	15								
U6 land West of Garden Village	169	169							15	35	35	35	35	14				
U7 land at Newhouse Farm, SW of Orton Rd	509	509									35	35	35	35	35	35	35	35
U8 Land North of Burgh Rd	66	66					33	33										
U9 Site of former Morton Park Primary School	54	54							14	35	5							
U10 Land off Windsor Way	304	304			24	35	35	35	35	35	35	35	35					

	Total/ Potential	o/s at 31/08/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
U11 land east of Lansdowne Close/ Lansdowne Court	71	71												11	30	30		
U12 land to rear of Border Terrier, Ashness Drive	18	18		18														
U13 land east of Beverly Rise	30	30						30										
U18 Opp Rosehill Ind Estate	150	150				15	35	35	35	30								
SUB TOTAL	3472	3472	0	32	74	151	280	367	374	405	385	349	286	150	135	135	85	35
Sites with Authority to Issue																		
Irthing Centre, Brampton	38	38	0	0	38													
Beech Cottage, Cumwhinton	15	15	0	0	15													
Broomfallen Road, Scotby	28	28	0	0	14	14												
SUB TOTAL	81	81	0	0	67	14	0	0	0	0	0	0	0	0	0	0	0	0
Existing allocations			82	110	95	115	75	112	150	210	116	116	110	50	50	50	50	50
Proposed Allocations			0	32	74	151	280	367	374	405	385	349	286	150	135	135	85	35
SUB TOTAL			82	142	169	266	355	479	524	615	501	465	396	200	185	185	135	85
Over 10 Unallocated Authority to Issue			222	257	288	275	194	147	85	95	95	78	60	60	60	60	60	15
SUB TOTAL			222	252	350	289	194	147	85	95	95	78	60	60	60	60	60	15
Windfall			100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
TOTAL			404	489	624	655	649	726	709	810	696	643	556	360	345	345	295	200
Carlisle South														250	300	300	300	300

Appendix 2



Trajectory of delivery from 2013 to 2030 based on site by site analysis