

Inspector Mrs C Sherratt  
(via Programme Officer)

**Please ask for:** Garry Legg  
**Direct Line:** 01228 817160  
**E-mail:** [garry.legg@carlisle.gov.uk](mailto:garry.legg@carlisle.gov.uk)  
**Your ref:**  
**Our ref:** 026-PS003

31 July 2015

Dear Mrs Sherratt,

**EXAMINATION OF THE CARLISLE DISTRICT LOCAL PLAN (2015 – 2030) –  
ADDITIONAL RESPONSE TO INITIAL COMMENTS / QUESTIONS TO THE COUNCIL**

I write further to the Council's initial response to you regarding the above, and specifically, as was indicated, to provide a more detailed response to Question 7.

Question 7 asks whether the appropriate buffer to be applied in the case of the five year land supply calculation for Carlisle should be 20%. It is acknowledged that national policy makes clear that the 20% should be applied where "*there has been a record of persistent under delivery of housing*".

The Council's Five Year Housing Land Supply Position Statement (April 2015) [Document library ref: EB 007] sets out the arguments which the Council consider justify why a 5% as opposed to 20% buffer should be applied in Carlisle's circumstances. This response seeks to add to and elaborate on this position.

Planning Practice Guidance states that:

*"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."*

As drafted the guidance makes clear that even where there is deemed to be persistent under delivery, a judgement needs to be exercised as to whether or not the requirement to bring forward an additional supply of housing land should be 'triggered'.

The Council would reiterate the point made in their response already that acting to bring forward additional land within Carlisle will not in the short term result in a commensurate uplift in housing delivery. This reflects that it is the capacity of the development industry to deliver which is currently constraining supply as opposed to the availability of land. In these circumstances the Council consider that whether the 20% buffer should apply or not is a largely academic point in that it would achieve little more in reality than the application of the 5% buffer.

It is acknowledged that the PPG states that *"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"*. A longer term view is however complicated in Carlisle given that the housing target has changed on multiple occasions in a relatively short period of time (as far as the context of forward planning is concerned). The consequence of this is that there has been little stability to date to meaningfully inform investment decisions. A key point to note in this regard is that a step change in delivery cannot simply be achieved over night from a lower previous requirement and that similarly the backdating of a plan period exacerbates this problem (as being in the past interventions are not possible).

Table one presents delivery performance against the various development plan targets in the recent past within Carlisle. As opposed to considering performance against annualised average rates of delivery, it also considers cumulative performance given that success is ultimately determined at the end of the plan period and whether the overall target has been met (i.e. annualised averages are exactly that and not a basis for determining performance in isolation).

Year	Net Completions / Projections	Carlisle Local Plan 2001 - 2016			Former RSS for the North West 2003 – 2021			Carlisle District Local Plan 2015 - 2030		
		Target	Net	cumulative	Target	Net	Cumulative	Target	Net	cumulative
01/02	395	354	41	41						
02/03	499	354	145	186						
03/04	462	354	108	294	450	12	12			
04/05	493	354	139	433	450	43	55			
05/06	481	354	127	560	450	31	86			
06/07	359	354	5	565	450	-91	-5			
07/08	374	354	20	585	450	-76	-81			
08/09	366	354	12	597	450	-84	-165			
09/10	233	354	-121	476	450	-217	-382			
10/11	260	354	-94	382	450	-190	-572			
11/12	429	354	75	457	450	-21	-593			
12/13	216	354	-138	319	450	-234	-827			
13/14	190	354	-164	155	450	-260	-1087	565	-375	-375
14/15	419	354	65	220	450	-31	-1118	565	-146	-521
15/16	485	354	131	351	450	35	-1083	565	-80	-601

16/17	654				450	204	-879	565	89	-512
17/18	666				450	216	-663	565	101	-411
18/19	647				450	197	-466	565	82	-329
19/20	698				450	248	-218	565	133	-196
20/21	684				450	234	16	565	119	-77
21/22	805							565	240	163
22/23	720							565	155	318
23/24	678							565	113	431
24/25	562							565	-3	428
25/26	610							565	45	473
26/27	645							565	80	553
27/28	645							565	80	633
28/29	587							565	22	655
29/30	485							565	-80	575

**Table One – Housing Delivery against Development Plan Targets**

The Carlisle Local Plan (2001-2016) was adopted in 2008 and was prepared within the context of the then County Structure Plan housing requirement of 354 net new homes per annum. Delivery can be seen to have fallen short / predicted to fall short in only four of the 16 individual years within the plan period. Importantly however cumulative performance can be seen to have always been on track, with supply having been frontloaded. It can be seen that there is evidently no record of ‘persistent under delivery’ in this context.

During this plan period, there was an issue of an over-supply of housing within the Rural Area against the Structure Plan. A moratorium was implemented effective from 17 July 2004 by way of an intervention measure. The moratorium was lifted in January 2006 just after the informal consultation of the Planning and Compulsory Purchase Act 2004, where Regional Planning Guidance was being replaced by Regional Spatial Strategies which removed County Structure Plans from the system. This 18 month moratorium consequently affected the supply coming forward in the subsequent years.

The North West Regional Spatial Strategy was also adopted in 2008 and set a housing requirement of 450 net new homes per annum for Carlisle, representing uplift against the County Structure Plan target which had influenced supply previously. In these circumstances there was an evident need to identify additional land to be in a position to sustain delivery performance particularly given that supply had been frontloaded within the context of delivery against the Structure Plan. Table one identifies that delivery can be seen to have fallen short / predicted to fall short in nine of the 18 individual years within the plan period, with performance strongly correlating with the recession and its impacts on housebuilding. Looking ahead the trajectory supports that delivery is predicted to recover with a strong confidence and evidence to support this recovery will transpire. In the context of the RSS it can be seen that there has evidently been a strong degree of ‘under delivery’ albeit the Council considers this owes to circumstances beyond local control.

It should also be noted that a further intervention in the form of an 'Interim Planning Policy Statement for New Housing Development in Carlisle' was adopted 1 May 2012, to be effective when the Council could not demonstrate a 5 year supply of housing land.

Within the context of the emerging Plan it is contended that it is simply too early to level an accusation that there is any degree of persistent under delivery. It must also be acknowledged that whilst under delivery has been recorded in 13/14 and to a lesser extent 14/15, the completions in these years are the consequence of decisions made in the three to four preceding years at which point a step change in delivery was not being contemplated and not therefore being planned for. Importantly within the context of the emerging Plan the trajectory supports that delivery is predicted to recover with a strong degree of confidence and evidence to support that this recovery will transpire. In these circumstances it is considered simply too early to conclusively assert that under delivery has been persistent.

It can be seen that when the development plan housing target has been locally driven and owned that there has been no degree of persistent under delivery. It is contended that had it not been for the recession then the same would have also been true with regards to the RSS.

One final point considered pertinent to note in the context of this matter is the detailed projection underpinning the housing requirement taken forward within the submitted Plan. This is set out in the Strategic Housing Market Assessment Update (2014) [Document library ref: EB002] on an individual year basis. It can be seen by way of reference to the projection on page 107 within Appendix Two of the report (Detailed Projection Outputs), and specifically the 'change from previous years' (households) that whilst the full period requirement equates to an annual average of 565 net new homes, the balance of this supply is not required until the later years of the plan period. In contrast the annual average requirement between 2013 and 2020, mirroring the period of required coverage for the five year land supply assessment, can be seen to equate to an average annual of 457 net new homes. This is considered material because it can be seen that employing a requirement of 565 in spite of this in the early years of the plan period can already be seen to include an inherent 'buffer' in that doing so is evidently acting to frontload supply. The application of a 20% buffer in these regards can be seen to not be necessary as it would simply exacerbate, in the short term at least, this existing degree of front loading.

In conclusion the City Council maintain that in the above circumstances, building on those set out in the Councils Five Year Housing Land Supply Position Statement (April 2015) [Document library ref: EB 007], that there is a strong case owing to Carlisle's circumstances as to why it would not be appropriate to 'trigger' the need to bring forward an additional supply and as such why the application of a 5% buffer is both appropriate and justified.

Once again please do not hesitate to contact me if it would be helpful to elaborate on any aspect of the Council's response on this matter.

Yours sincerely,

A handwritten signature in black ink that reads "Gary Legg". The signature is written in a cursive style with a large 'G' and 'L'.

**G Legg**

Investment & Policy Manager

**Economic Development**

cc. Tony Blackburn, Programme Officer