

CARLISLE DISTRICT LOCAL PLAN (2015 – 2030)

STATEMENT ON THE INTRODUCTION OF A PHASED / STEPPED APPROACH TO HOUSING DELIVERY

1.0 Background:

1.1 This statement has been prepared in response to the preliminary issue of the five year housing land supply identified by the Inspector appointed to examine the Carlisle District Local Plan (2015 – 2030). The Inspector has invited¹ the Council's view on how it wishes to address the shortfall in the five year housing land supply. The Council responded² to the Inspector identifying that it was confident the concerns raised could be overcome and outlined the approach as to how. In summary the approach put forward proposes to modify the Plan to introduce a phased/stepped approach to housing delivery. This statement sets out in more detail the nature of the suggested approach, how it would operate and the modifications required to the Plan to accommodate it. It also sets out how, if introduced, the Plan can still be regarded as having been 'positively prepared' and therefore 'sound'.

2.0 Alignment with the Evidence:

2.1 The key evidence underpinning the housing requirement is the Strategic Housing Market Assessment (SHMA) update (September 2014). This assessment looked at a range of scenarios based on both demographic trends and likely housing need linked to a growing workforce (to be sufficient to match an Experian economic forecast). The study concluded that between 480 (demographic) and 565 (jobs-led) dwellings per annum would be required in the 2013-30 period for needs to be met. The Council proposed a level of provision at the upper end of this scale within the submitted Plan.

2.2 It should however be noted that these figures are an annualised average for the whole of the 2013-30 period and in reality there are year-on-year variations with regards to housing need. In Carlisle, it is notable for both scenarios that the level of need is lower in the early part of the projection period and increases over time.

2.3 In the case of the demographic projection, this is due to net migration being expected to increase in future years (a finding consistent with the latest 'official' projections – the 2012-based subnational population projections (SNPP) from ONS). An increasing level of net migration is driven by changes to the age

¹ Via correspondence on the 14th August 2015 (Document Ref: EL1.003a)

² Via correspondence on the 26th August 2015 (Document Ref: EL1.003b)

structure of the population in Carlisle and in areas from which people might be expected to move to the District. A changing age structure impacts on expected levels of both in- and out-migration to/from the District.

- 2.4 In the case of the jobs-led projection, a lower level of housing need in the early part of the projection period is driven by two main factors. Firstly, job-growth is generally expected to be stronger post-2020 (and hence a greater increase in population would be required) and secondly, the modelling (consistent with national economic forecasts) expects there to be a greater improvement in employment rates in the short-term as the economy moves out of recession.
- 2.5 Key points worth noting from the Experian projections for Carlisle from 2015 in relation to when projected jobs growth/decline is expected to occur are as follows:
- More than two thirds of the estimated total job growth in Carlisle is projected to arise from 2020 onwards.
 - The three biggest growth sectors numerically between 2015 and 2030 are projected to be Public Services (mainly health), Transport & Storage and Wholesale & Retail.
 - 76% of the growth in Public Services jobs are projected to arise from 2020 onwards and 63% of the Transport & Storage jobs are projected to arise from 2020 onwards. The exception to this trend is Wholesale & Retail where the majority of the projected job growth is anticipated in the first third of the period (81%). However, additional jobs in this sector are most likely to be filled by existing residents rather than attracting inward migration.
- 2.6 These findings support a strong case to consider the phasing of housing development to match when both population growth and job-growth is expected to happen. Appendix 2 of the SHMA Update³ provided detailed outputs from the demographic modelling and this information has been used (along with an allowance for vacant homes) to study when it is expected that the housing need will arise.
- 2.7 Table One below shows the need for housing in each year from 2013 to 2030 for both the demographic and jobs-led scenario. The table also shows the estimated number of jobs expected to be created in the Experian forecast. The analysis at the bottom of the table shows the estimated need for the first seven years of the projection (2013-20) and also the last ten years (2020-30).

³ Strategic Housing Market Assessment Update – Sep 2014 (Document Ref: EB 002)

2.8 The analysis shows that under the demographic scenario there is an average annual need for some 442 dwellings in the 2013-20 period, and that this rises to 509 for the remainder of the plan period. In the case of the jobs-led scenario a need for 477 dwellings per annum is shown to 2020; followed by a significantly higher average figure of 625 from 2020 to 2030. As noted, this is partly due to an increase in the number of jobs expected to be created (rising from 349 per annum in the 2013-20 period to 390 from 2020 to 2030).

Table One: Phasing of housing need and expected timing of job growth						
	Demographic-based		Jobs-led		Jobs	
	Housing need	Cumulative	Housing need	Cumulative	Jobs	Cumulative
2013/14	418	418	519	519	465	465
2014/15	400	819	465	984	404	868
2015/16	471	1,290	476	1,460	390	1,258
2016/17	468	1,757	436	1,897	224	1,482
2017/18	447	2,204	440	2,337	183	1,665
2018/19	458	2,663	522	2,859	377	2,042
2019/20	429	3,092	481	3,339	404	2,446
2020/21	492	3,584	615	3,954	481	2,927
2021/22	501	4,085	798	4,752	629	3,556
2022/23	484	4,569	565	5,317	289	3,844
2023/24	490	5,059	604	5,921	339	4,183
2024/25	487	5,546	586	6,507	350	4,533
2025/26	510	6,056	573	7,080	325	4,857
2026/27	515	6,571	522	7,602	246	5,104
2027/28	529	7,100	713	8,315	516	5,620
2028/29	543	7,642	629	8,945	327	5,947
2029/30	541	8,183	645	9,589	402	6,348
2013-2020	442	3,092	477	3,339	349	2,446
2020-2030	509	5,091	625	6,250	390	3,903

Source: SHMA update (2014) and Experian (2014)

2.9 Overall, this analysis shows consideration can and should be legitimately afforded to the phasing of development so that housing growth matches both the demographic and (higher) economic need. Seeking to provide a 'flat rate' of housing averaging 565 per annum throughout the plan period could mean, aside from presenting well documented land supply issues in the earlier years, providing more homes than there is either a demographic or economic need or demand for. The need for 565 dwellings per annum in the early part of the projection period (to 2020) can therefore be seen to be evidently not critical as it is not proven as required by the available evidence and analysis.

- 2.10 It is also considered important to note that since the SHMA update was published, CLG have produced a new set of trend-based household projections. In the period from 2013 to 2020 these projections are only showing household growth of 233 per annum on average (potentially equating to 243 dwellings per annum when an allowance is factored in for empty homes). This is significantly below the levels proposed in the emerging Plan and again supports that a phased approach with slightly lower numbers at the start of the plan period would more closely match when the housing need might be expected to arise.
- 2.11 Additionally, in June 2015, ONS published a new set of mid-year population estimates (MYE) for the 2013-14 period. These showed that the population of Carlisle had grown by around 73 people in the 12-months to mid-2014; a figure which is substantially lower than projected through the SHMA (population growth of 525 people in the main demographic scenario and 801 from the jobs-led one). This lower population growth would be expected to derive a lower need for housing and again supports a lower target in the early part of the plan period.
- 2.12 In conclusion a phased approach to housing delivery which would require an annualised average 477 net new completions between 2013 and 2020 and 625 net new completions between 2020 and 2030 is considered entirely appropriate and sound. Such an approach would have the added benefit of affording the development industry an opportunity to expand and increase in capacity within Carlisle, a necessary response to achieve and sustain the required Local Plan delivery rates moving forward.
- 2.13 Importantly it is not considered necessary to seek to manage delivery to restrict delivery rates in the 2013 to 2020 period. In the event that the industry can mobilise quicker than anticipated and demand is greater than envisaged, there appears no evident logic to hold back and constrain supply.

3.0 Necessary Modifications

- 3.1 It is considered that a phased approach to housing delivery could be integrated within the Plan by way of a modification to Policy SP2. The overall quantum of housing planned for between 2015 and 2030 would remain unchanged. However it is proposed that the Plan now makes reference to a base date for housing of 2013 and reference to the total quantum across the 2013 - 2030 period. Whilst not explicit within the Plan this has been accepted by the Council for housing land supply assessments in any event, as evident in the Councils Five Year

Housing Land Supply Position Statement⁴. Furthermore it is not considered that the Plan's overarching vision would be compromised. As such 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.

3.2 Accordingly the Council propose a main modification to Policy SP2 which would amend criterion 1 to instead read:

1. *Sufficient land will be identified to support the delivery of an annualised average of at least ~~565 net new homes between 2015 and 2030~~*

- **477 net new homes between 2013 and 2020; and**
- **625 net new homes between 2020 and 2030 (adjusted to have regard to delivery in the 2013 – 2020 period).**

a. *70% of this growth will be focussed on the urban area of Carlisle, with 30% in the rural area; and*

b. *specific sites have been identified within the Plan, alongside an allowance for windfall developments, to accommodate the growth required until 2025. Carlisle South has been identified as a broad location to accommodate housing growth beyond this period.*

3.3 It is recognised that there will be a need to amend and add to the policy justification in order to reflect the modification to Policy SP2 and provide the rationale for the phased approach to housing delivery. As such it is proposed to amend paragraphs 3.8, 3.9 and 3.10 as follows:

3.8 *Policy SP 2 makes provision for an ~~annualised average of at least 565 net new homes between 2015 and 2030, equating to a total minimum of 8,475~~ **9,605 dwellings** across this 15 year period **between 2013 and 2030**. The District of Carlisle constitutes a self contained strategic housing market area and this level of growth therefore reflects what the Council consider to represent the District's objectively assessed housing need.*

3.9 *The ~~annual~~ housing requirement **and time period to which it relates** of ~~565~~ is consistent with the **base date and** findings of the Carlisle Strategic Housing Market Assessment (SHMA) Update 2014, and...*

3.10 *The POPGROUP "10 year migration scenario", based on historic migration trends, and the "Experian jobs led scenario", based on the latest job projections*

⁴ Five Year Housing Land Supply Position Statement – April 2015 (Document Ref: EB 007)

for the District of Carlisle, point to an annual housing requirement of between 383 and 592 new homes. The SHMA Update 2014 also produces projections which suggest an annual housing requirement of between 485 and 565 new homes. The proposed ~~annual housing requirement~~ **pursued by the Plan can be seen to align with this evidence** of 565 is ~~both within the ranges of both sets of housing projections identified in the POPGROUP modelling and SHMA~~ and is considered reflective of the requirements set out in paragraph 47 of the NPPF.

- 3.4 It is also proposed to insert two new paragraphs between existing paragraphs 3.10 and 3.11 as follows:

To ensure that land is available when needed to respond to identified needs the Plan identifies a phased approach to delivery. This reflects that with regards to the jobs-led projection which has influenced the housing requirement, that job-growth is generally expected to be stronger post 2020 (and hence a greater increase in population would be required from this point). A phased approach also and importantly affords an opportunity for the development industry to mobilise and increase its capacity within Carlisle, necessary given the migration from a historically lower housing requirement in preceding plan periods and industry base position.

To ensure supply keeps pace with demand it is important that any shortfall within the 2013 to 2020 period is addressed within this same period. Beyond 2020 the annualised average employed for assessment purposes should similarly be adjusted to have regard to any under or over provision in the preceding seven year period.

- 3.5 The latter of the above paragraphs is considered necessary to provide clarity around how land supply assessments should be conducted given the proposed phased approach to housing delivery. Reference to adjusting the target in the 2020 – 2030 period accords with well-established practice.
- 3.6 Finally it is proposed to amend paragraph 3.16 to instead read:

3.16 The delivery of housing to meet the Local Plan target will be monitored through the Annual Monitoring Report (AMR), and if the rate of delivery is not as expected, the Council will seek to work directly with stakeholders to identify any barriers to development, and consider further interventions including bringing forward additional or substituting allocations. **In the context of the Plan's phased approach to housing delivery, the need to ensure that delivery is on track for the required step change beyond 2020 is acknowledged as particularly important.**

- 3.7 A revised Table One (Summary of Housing Land Supply) and Figure One (Housing Delivery Trajectory), updated to reflect the position as at the 1st April 2015, have been produced and are proposed to be included within the Plan on pages 37 and 38 respectively. A full tracked change version of Policy SP2 including relevant sections of the supporting text, revised Table One and Figure One is appended to this statement as Appendix One.
- 3.8 Importantly as drafted, and as proposed to be modified, it is not considered that in the event supply was able to exceed expectations in the 2013 to 2020 period that it would be precluded from coming forward. This reflects that Policy SP2 still refers to “at least” and as such is therefore an evident minimum.
- 3.9 Consideration has been afforded to any implications from the proposed modifications from a Sustainability Appraisal perspective. Whilst the SA appraised strategic options at either end of the SHMA range of scenarios, it did not consider a phased approach. This is not however considered to be material, which reflects a belief that given the high level and strategic nature of the SA on strategic options for the Plan, that it is the overall quantum of development across the plan period which influences the outcome and this remains unchanged. Consequently it is not considered that there is a need to revisit the Plan’s accompanying Sustainability Appraisal.

4.0 Implications for Land Supply

- 4.1 Revised five year land supply assessments are set out below in Table Two. These demonstrate that based on the proposed phased approach to delivery, the Council can demonstrate a five year land supply on the assumption that any shortfall is to be made good within the 2013-2020 period and regardless of whether a 5% or 20% buffer is employed. On this latter point and for the avoidance of doubt the Council maintain that based on reasoning already before the Inspector that the 5% buffer is the most appropriate in Carlisle’s circumstances.
- 4.2 Within the assessments it is considered pertinent to highlight that 135 units from proposed allocation U14 (out of a total 189) have now been included in the deliverable supply to 2020. This reflects that a full planning application for 189 dwellings is due to imminently be lodged with the Council having been worked up through the process of pre-application discussions. The decision to previously exclude this site from the five year supply reflected a belief that proposed allocation U19 (in the same developer control as U14) would be prioritised and brought forward prior to U14. Site U19 has now however been formally withdrawn as an allocation. The additional yield proposed on site U14 in

comparison to the indicative capacity outlined in the submitted Plan reflects that the red edge associated with the site is larger than that of the allocation. There is sound reasoning for this however and the Council is therefore unlikely to object to the proposal on this basis.

Table Two – Five Year Housing Land Supply Assessment		
Requirement 2013 – 2020: at 477 per annum	5% Buffer	20% Buffer
Base requirement (5 x 477)	2,385	2,385
Backlog between 2013 and 2015	345	345
Sub Total	2,730	2,730
Buffer	136	546
Total Requirement	2,866	3,276
Requirement as an annualised average (between 2015 – 2020)	573	655
Forward Land Supply to 2020		
Quantified net deliverable supply to 2020 (see appendix 4)	3,285	3,285
Balance		
Forward supply less requirement	419	9
Supply in Yrs	5.73 Yrs	5.01 Yrs

5.0 Deliverability

- 5.1 Carlisle City and the other district Councils in Cumbria are committed to helping to expand the development industry and increase its capacity within the County. This reflects an acceptance that to do so will be critical to realising housing and economic objectives across the sub-region.
- 5.2 The Homes and Communities Agency have been engaged to assist in promoting development opportunities within Cumbria and in facilitating direct discussions with house builders (including registered providers) who do not currently have an active presence. An event took place on the 13th July 2015, at the Homes and Communities Agency's offices in Warrington, focussed on showcasing the opportunities within Cumbria and particularly those on the back of significant and largely unrivalled economic investment including at Britain's Energy Coast. The event was well attended by developers and constituted a useful platform from which to engage in further dialogue with developers on a one to one basis.

- 5.3 More recently officers from Carlisle City Council have met and held positive discussions with representatives from the Home Builders Federation, the focus of which have been on identifying what measures the Council can take to encourage and support the Federation's members to establish a presence in Cumbria. One of the outcomes of these initial discussions is that the Council have been afforded an opportunity to attend the next north east meeting of the Federation, on the 7th October, with a view to promoting opportunities in Carlisle and Cumbria directly to their members. To assist in this and wider promotional efforts the Council have produced a range of material which complements more generic sense of place branding and promotion. Copies of this material can be made available to the Inspector upon request if deemed of interest.
- 5.4 Efforts have also been ongoing within Cumbria to better understand and communicate the economic benefits of housebuilding. In August Carlisle City Council, on behalf of the Cumbrian districts, commissioned Nathaniel Lichfield and Partners to quantify and communicate through an infographic the economic benefits of housebuilding, linked to Local Plan housing targets, replicating an earlier and similar exercise which was done for Carlisle using NLP's respected eVALUATE housing model. This work, the outcome of which is appended to this statement as Appendix Two, is assisting in raising the profile of the importance of housing delivery amongst stakeholders, including the Cumbria LEP who funded the analysis, the need for which is fundamental to support interventions to help secure delivery.
- 5.5 It is also considered of relevance to note that Carlisle City Council is developing a Housing Delivery Action Plan. The intention of this is to make clear the actions that the Council will be undertaking to help boost the supply of open market and affordable homes within the District, including using its own assets (land and finance) to do so. The actions within the Plan have been structured around a number of pledges the intention of which is to make clear the Council's commitment to aiding housing delivery.
- 5.6 As opposed to being 'one-off' exercises the City Council is committed to, working jointly with the adjoining districts where of mutual benefit, an ongoing programme of engagement and support to assist developers who are not currently active within the District to become so. A better understanding of the importance of housing and the need to secure a step change in delivery across the sub-region is also ongoing with a view to informing the Cumbrian devolution deal.
- 5.7 The Council considers that the recent emergence of an additional and nationally recognised volume housebuilder within the District, in relation to a proposed

housing allocation within the submitted Plan, supports their assertions that the range of allocations included in the Plan constitutes an attractive and flexible portfolio which can be viably acquired and developed. Furthermore the Council consider that it also demonstrates that the capacity of the industry can be expanded within Carlisle as required to succeed in realising the Plans growth ambitions. Consequently the Council consider that a step change in delivery can be achieved and sustained and that as such there is a reasonable prospect that delivery will align with the required higher annualised average proposed within the 2020 – 2030 period of the Plan.

6.0 Conclusions

6.1 It is considered that a phased approach to housing delivery, which in effect introduces a stepped housing target, would be appropriate in Carlisle. Such an approach would be consistent with the time at which the need/demand for housing is expected to arise, as well as being consistent with more recent data (from ONS/CLG) which shows lower levels of population and household growth than had been assumed through the SHMA. Furthermore it would act to address the concerns highlighted with respect to demonstrating a five year housing land supply in a way which is responsive to Carlisle's circumstances.

6.2 Of note is a recent Inspectors Report on the Herefordshire Local Plan Core Strategy (September 2015) which supports the principle of a stepped target. Notwithstanding some differences in Herefordshire's circumstances, a number of similarities can equally be seen to exist with Carlisle. Paragraph 47 of this report is considered of particular relevance as follows:

47. In addition, figures show that the market has been depressed with a shortfall of over 900 dwellings as of April 2014 identified in the Housing Land Supply document of October 2014 [PS1a]. Although there has been significant increase in the land supply position during 2014 – 2015 and increase in housing, delivery would take some time to achieve. The target figures do not seek to constrain development which should come forward as soon as possible, but I accept that the stepped target would be realistic and a sound basis for monitoring and assessing land supply (including the five year housing land supply) throughout the plan period...

6.4 In conclusion the Council consider that proposed modifications would act to ensure that the housing elements of the Plan can be regarded as having been justified, positively prepared and therefore sound.

APPENDIX ONE – Policy SP2 (and relevant supporting text) as proposed to be modified

Policy SP2 – Strategic Growth and Distribution

To ensure that objectively assessed development needs are met, and met in the most sustainable manner, strategic growth within the District of Carlisle will be governed by the following principles:

1. Sufficient land will be identified to support the delivery of an annualised average of at least ~~565 net new homes between 2015 and 2030~~

- **477 net new homes between 2013 and 2020; and**
- **625 net new homes between 2020 and 2030 (adjusted to have regard to delivery in the 2013 – 2020 period).**

a. 70% of this growth will be focussed on the urban area of Carlisle, with 30% in the rural area; and

b. specific sites have been identified within the Plan, alongside an allowance for windfall developments, to accommodate the growth required until 2025. Carlisle South has been identified as a broad location to accommodate housing growth beyond this period.

2. Sufficient land will be identified to create the right conditions for economic growth:

a. the focus for development will be within the urban area of Carlisle and locations which can maximise the benefits of Carlisle's highly accessible position in relation to the M6 Corridor; and

b. whilst efforts will be focussed across the plan period on realising the residual capacity within existing employment areas, this approach will be complemented by the allocation of an additional 45 (Ha) for employment related purposes.

3. Development of surplus land at Ministry of Defence (MOD) Longtown, which lies within the strategic M6 Corridor and benefits from excellent road and rail connections, will also be supported as a key element of the strategy to grow the economy, and to secure modal shifts in freight transport.

4. The City Centre will maintain and enhance its status by being the primary focus for further comparison retail development across the Plan period:

a. specifically, sufficient land will be identified within the City Centre to accommodate an additional 18,700m² net comparison retail floorspace until 2030.

5. Provision for leisure and other 'main town centre uses' will be based on the need to protect and enhance the vitality and viability of the City Centre, District Centres and Local Centres as defined on the Policies Map.

6. Where possible and appropriate, the re-use and redevelopment of previously developed land will be encouraged across the District. Within the urban area of Carlisle the reuse and redevelopment of underused, vacant and derelict land will be supported in order to secure the continued regeneration of the City.

7. Within the District's rural settlements, development opportunities of an appropriate scale and nature, which are commensurate with their setting, will be harnessed to positively contribute to increasing the prosperity of the rural economy and to enable rural communities to thrive.

8. Within the Open Countryside, development will be assessed against the need to be in the location specified.

Justification

3.6 Policy SP 2 sets out the level of objectively assessed development needs to be delivered within the District until 2030, and importantly a number of key principles to guide how, where and when these will be met in order to ensure that sustainable patterns of development prevail across the plan period. This policy therefore constitutes a key strategic policy which will be used to shape how the District develops in the future.

3.7 The delivery of housing is a key thrust of the spatial strategy necessary in order to respond to changes in local demographics and equally in accommodating in-migration necessary to support economic growth through helping to sustain an economically active workforce.

3.8 Policy SP 2 makes provision for ~~an annualised average of at least 565 net new homes between 2015 and 2030, equating to a total minimum of 8,475~~ **9,605 dwellings** ~~across this 15 year period~~ **between 2013 and 2030**. The District of Carlisle constitutes a self contained strategic housing market area and this level of growth therefore reflects what the Council consider to represent the District's objectively assessed housing need.

3.9 The ~~annual~~ housing requirement **and time period to which it relates** of 565 is consistent with the **base date and** findings of the Carlisle Strategic Housing Market Assessment (SHMA) Update 2014, and the latest 2014 POPGROUP modelling undertaken by the Cumbria Intelligence Observatory. POPGROUP is a software product designed to project populations, households and labour forces associated within specified future scenarios and is widely regarded as a credible tool to derive robust projections. To do this, it builds upon Office of National Statistics projections using further assumptions, for example: the continuation of longer/shorter term trends in

birth, death and migration rates, future development proposals and the anticipated performance of the local economy.

3.10 The POPGROUP “10 year migration scenario”, based on historic migration trends, and the “Experian jobs led scenario”, based on the latest job projections for the District of Carlisle, point to an annual housing requirement of between 383 and 592 new homes. The SHMA Update 2014 also produces projections which suggest an annual housing requirement of between 485 and 565 new homes. The proposed annual housing requirement **pursued by the Plan can be seen to align with this evidence** of 565 is both within the ranges of both sets of housing projections identified in the POPGROUP modelling and SHMA and is considered reflective of the requirements set out in paragraph 47 of the NPPF.

3.11 To ensure that land is available when needed to respond to identified needs the Plan identifies a phased approach to delivery. This reflects that with regards to the jobs-led projection which has influenced the housing requirement, that job-growth is generally expected to be stronger post 2020 (and hence a greater increase in population would be required from this point). A phased approach also and importantly affords an opportunity for the development industry to mobilise and increase its capacity within Carlisle, necessary given the migration from a historically lower housing requirement in preceding plan periods and industry base position.

3.12 To ensure supply keeps pace with demand it is important that any shortfall within the 2013 to 2020 period is addressed within this same period. Beyond 2020 the annualised average employed for assessment purposes should similarly be adjusted to have regard to any under or over provision in the preceding seven year period.

3.14~~2~~ The spatial strategy seeks to focus the majority (70%) of new housing growth on the City of Carlisle which aside from reflecting that this is where the majority of housing needs arise within the District also reflects a desire to enhance the City’s role as a sub-regional centre. Concentrating development on the City also reflects that this area is well served by existing infrastructure which entails evident sustainability benefits. The remainder of housing growth (30%) will occur within the District’s rural settlements including in Brampton and Longtown.

3.12~~3~~ Specific allocations have been identified within the Local Plan to contribute, alongside existing commitments and an allowance for windfall, to meeting the growth required for the first ten years of the Plan until 2025. Beyond this Carlisle South, which is subject to the provisions of Policy SP 3, has been identified as a broad location to accommodate housing growth in the latter years of the Plan and beyond.

3.134 The supply of housing land is summarised in Table 1 with the anticipated rate of delivery illustrated through the trajectory at Figure 1.

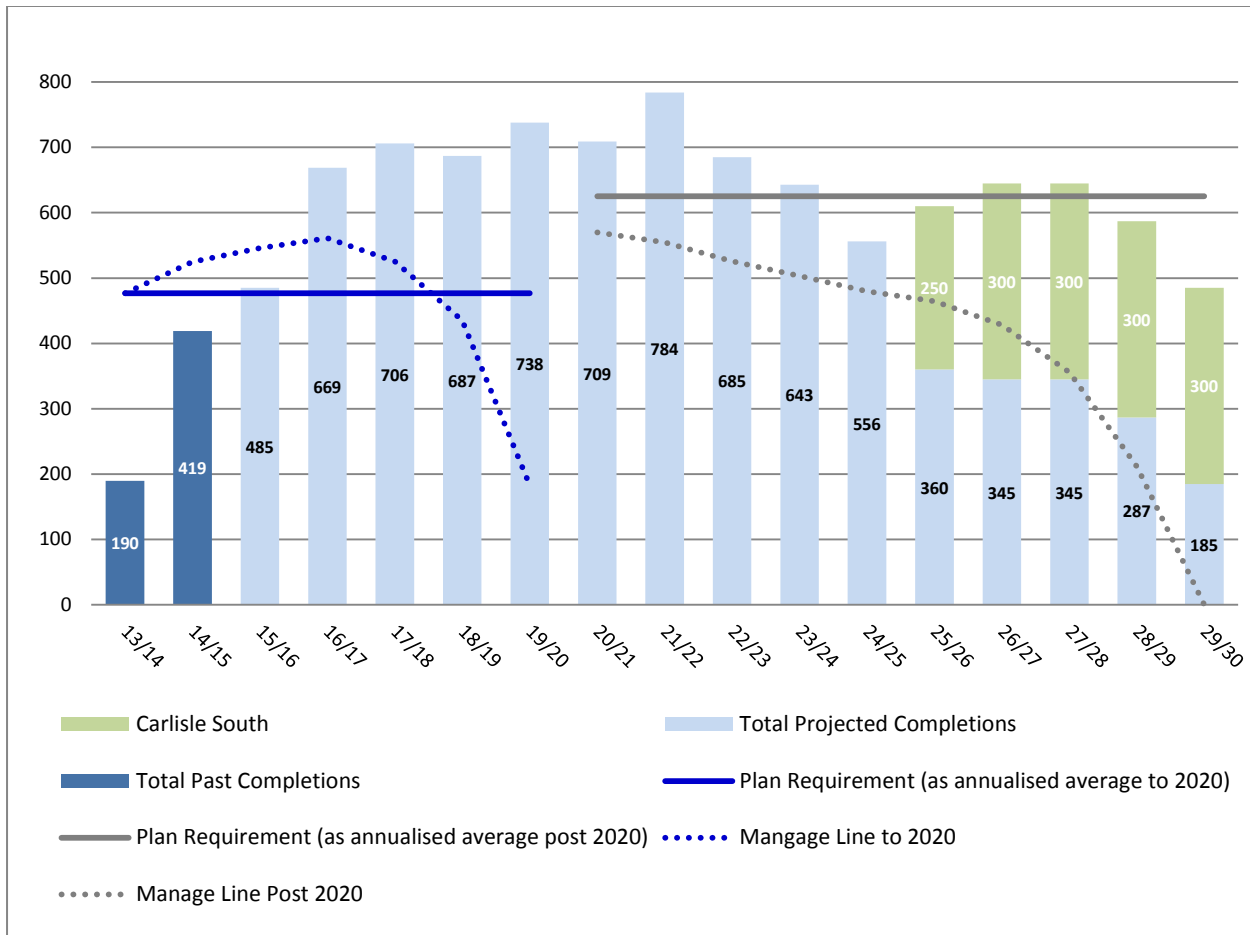
Table 1 – Summary of Housing Land Supply (~~as at 1st October 2014~~) (as at 1st April 2015)

Source	No. Of Dwellings	<u>No. Of Dwellings</u>
<u>Delivery to date (2013 – 2015)</u>		<u>609</u>
Outstanding Planning Permissions	4,063	<u>3,884</u>
Proposed Local Plan Allocations*	3,472	<u>3,953</u>
Windfall Provision [@ 100 dwellings per annum across the plan period]	1,500	<u>1,500</u>
Strategic Allocation – Carlisle South	1,450	<u>1,450</u>
Total Supply	10,485	<u>11,396</u>

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

3.145 Whilst Table 1 indicates a total supply which would support a higher rate of delivery than that proposed within the Local Plan, it is recognised that not all of the existing permissions and allocations may be built out in full within the plan period, which the trajectory reflects. Nevertheless, if economic and market conditions are favourable, it demonstrates that the Local Plan target could be exceeded.

Figure 1 – Housing Delivery Trajectory as at 1st April 2014 **2015**



3.156 Despite historic under delivery owing predominately to unfavourable economic conditions and the recent global recession, there are encouraging market signals to support that the desired level of housing growth can be achieved particularly across the longer term. In this regard the Council is fully committed to directing its own resources to aid delivery efforts, with a housing action plan in place to guide interventions. A key part of this action plan is engagement with housing enablers to better understand future opportunities as well as risks and constraints.

3.167 The delivery of housing to meet the Local Plan target will be monitored through the Annual Monitoring Report (AMR), and if the rate of delivery is not as expected, the Council will seek to work directly with stakeholders to identify any barriers to development, and consider further interventions including bringing forward additional or substituting allocations. **In the context of the Plan’s phased approach to housing delivery, the need to ensure that delivery is on track for the required step change beyond 2020 is acknowledged as particularly important.**

3.18 A review of the housing element of the strategy would also be instigated if evidence used to determine the housing requirement changes; monitoring shows the

strategy is not meeting its objectives; or sustained market signals indicate a clear need for change.

3.179 The identification of surplus land....

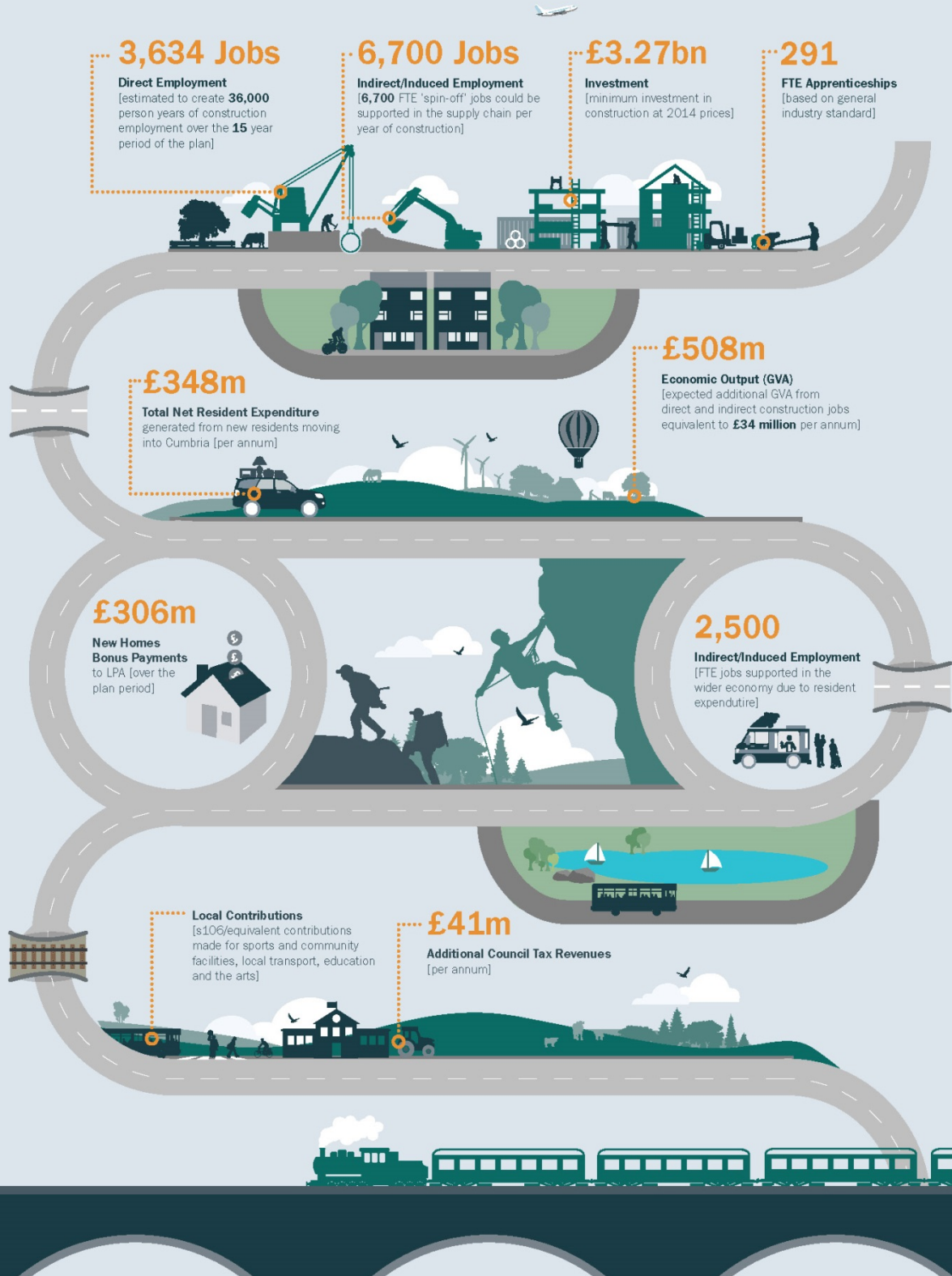
Appendix 2

eVALUATE
CUMBRIA

The Economic Benefits of delivering new homes in Cumbria over 15 years

nlp Nathaniel Lichfield & Partners
Planning, Design, Economics.

Up to **33,020** new homes, including up to **8,800** new affordable homes, offers the opportunity to sustain and enhance economic performance, and respond to meeting Cumbria's future market and affordable housing needs.



APPENDIX THREE – Quantified deliverable supply

	Total/ Potential	o/s at 01/04/15	u/c at 01/04/15	completed 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	onwards
Sites with Planning Permission																				
Morton	825	825	0	0	0	0	0	15	35	35	35	50	50	50	50	50	50	50	50	305
Penguin	37	21	20	16	21	0	0	0	0											0
Adj Alexander Drive, Durranhill (pt of Durranhill)	49	0	0	2	0	0	0	0	0											0
Key Safety System	52	27	0	0	0	0	27	0	0											0
Racecourse	42	42	1	0	0	10	10	10	12											0
Nelson St	103	103	0	0	0	0	0	0	0	15	35	35	18	0						0
Rome St 2	48	48	0	0	0	0	0	0	0	0	0	0	18	30						0
Peter Lane/Dalston Road	103	94	9	9	35	35	24	0	0											0
West Wigton Road	276	167	30	52	40	40	40	40	7											0
Sawmill Longtown	74	33	6	5	10	13	10	0	0											0
Raffles	345	176	41	29	35	35	35	35	36	0										0
Raffles Ave & Dalton Ave	37	7	7	30	7	0	0	0	0	0										0
Former Dairy Site, Botcherby [U15]	66	66	0	0	0	0	16	35	15											0
Ambulance Station	29	15	13	14	15															0
50 Victoria Place	50	50	1	0	0	50														0
Leabourne Road	13	13	4	0	0	0	0	4	9											0
Hammonds Pond	318	298	17	20	35	35	35	35	35	35	35	35	18	0						0
Highgrove Dairy	96	54	7	4	10	20	24	0	0											0
Westrigg/Wigton Road	48	30	0	0																30
Border Terrier, Ashness Drive [U12]	18	18	0	0	0	18	0	0	0											0
Crindledyke	850	762	39	54	50	50	50	50	50	50	50	60	60	60	60	60	60	60	52	0
St Augustines	42	42	42	0	42	0	0	0	0											0
Land at Petteiril Bank Road	14	14	0				14													0
Scaurbank, Netherby Rd	14	14	0		0	0	4	10	0											0
Barns at Brackenhill Tower, Longtown	10	9	0	1	0	0	4	5	0											0
Irthing Centre Brampton	38	38	0	0	0	38	0	0	0											0
Townhead Rd Dalston	121	93	34	28	35	35	23	0	0											0
Kingswood, Cumdivock	10	9	1	1	1	2	2	2	2											0
Hadrians Camp, Houghton [R10]	99	99	1	0	10	35	35	19	0											0

	Total/ Potential	o/s at 01/04/15	u/c at 01/04/15	completed 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	onwards
Scotby Steading	45	16	16	29	16	0	0	0	0											0
former George Public House, Warwick Bridge	31	18	1	13	8	10	0	0	0											0
Lime House, Wetheral	15	6	6	8	6	0	0	0	0											0
Skelton House, Wetheral	15	15	15	0	5	10	0	0	0											0
L/A Beech Cottage [R 8]	15	15	0	0	0	5	10	0	0											0
Rear Thornedge, Cumwhinton	21	21	0	0	0	10	11	0	0											0
Sub Total	3969	3258	311	315	381	451	374	260	201	135	155	180	164	140	110	110	110	102	50	335
Sites with Authority to Issue																				0
Grounds of Suttle House	35	35	0		0	15	20	0	0	0	0	0	0	0	0	0	0	0	0	0
Rear 39 - 55 Scotby Road	14	14					7	7												0
Broomfallen Road, Scotby [R16]	28	28			0	14	14													0
Land to the south of Old Road, Longtown [Briar Lea Court] [R 5]	61	61					11	30	20											0
land SE of J 44 Kingstown [U 1]	217	217					15	35	35	35	35	35	27	0	0					0
Sub total	355	355	0	0	0	29	67	72	55	35	35	35	27	0	0	0	0	0	0	0
Allocations in Proposed Submission Draft																				
R 1 Land South of Carlisle Rd, Brampton	250	250				15	35	35	35	35	35	35	25	0	0	0	0	0	0	0
R 2 land west of Kingwater Close, Brampton	60	60										15	30	15	0	0				0
R 3 Land north of Greenfield Lane, Brampton	140	140							20	35	35	35	15	0	0	0	0	0	0	0
R 4 Former Lochinvar School, Longtown	106	106							15	20	20	20	20	11	0	0	0	0	0	0
R 6 Amberfield, Burgh by Sands	25	25						5	20	0	0	0	0	0	0	0	0	0	0	0
R 7 Land east of Cummersdale Rd, cummersdale	14	14						7	7	0	0	0	0	0	0	0	0	0	0	0
R 9 land West of How	20	20								0	0	10	10	0	0	0	0	0	0	0

	Total/ Potential	o/s at 01/04/15	u/c at 01/04/15	completed 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	onwards
Croft, Cumwhinton																				
R 11 Kingmoor Park Harker Estate, Harker	300	300								35	35	35	35	35	35	35	35	20	0	0
R 12 Land East of Monkhill Road, Moorouse	10	10								5	5	0	0	0	0	0	0	0	0	0
R 14 Land at Tower Farm, Rickerby	10	10					5	5						0	0	0	0	0	0	0
R 15 Land off Hill Head, Scotby	50	50								0	0	0	15	35	0	0	0	0	0	0
R 17 Warwick Bridge/Little Corby North	45	45								15	15	15	0	0	0	0	0	0	0	0
R 18 Land off Heads Nook Road, Corby Hill	30	30											15	15	0	0	0	0	0	0
R 19 Wetheral South	60	60								20	20	20	0	0	0	0	0	0	0	0
R 20 Land west of Steel's Bank, Wetheral	40	40					20	20		0	0	0	0	0	0	0	0	0	0	0
R 21 Land west of Wreay School	10	10					5	5	0	0	0	0	0	0	0	0	0	0	0	0
U 2 Land North of California Rd	187	187											17	35	35	35	35	30	0	0
U 3 Site of Pennine Way School	112	112							22	35	35	20	0	0	0	0	0	0	0	0
U 4 land North of Moorside Drive/ Valley Drive	140	140									15	35	35	35	20	0	0	0	0	0
U 5 Land between Carleton Rd & Cumwhinton Rd	204	204			4	35	35	35	35	35	25	0	0	0	0	0	0	0	0	0
U 6 land West of Garden Village	169	169								15	35	35	35	35	14	0	0	0	0	0
U 7 land at Newhouse Farm, SW of Orton Rd	509	509										35	35	35	35	35	35	35	35	229
U 8 Land North of Burgh Rd	66	66					33	33		0	0	0	0	0	0	0	0	0	0	0
U 9 Site of former Morton Park Primary School	54	54								14	35	5								0
U 10 Land off Windsor Way	304	304				24	35	35	35	35	35	35	35	35	0					0
U 11 land east of Lansdowne Close/ Lansdowne Court	71	71													11	30	30	0	0	0
U 13 land east of Beverly Rise	30	30							30											0
U 14 Carleton Clinic	189	189			0	15	40	40	40	40	14	0	0	0						0

	Total/ Potential	o/s at 01/04/15	u/c at 01/04/15	completed 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	onwards
U 16 Deer Park	100	100					0	0	30	35	35									0
U 17 Remainder Morton Allocation	60	60											30	30						0
U 18 Opp Rosehill Ind Estate	150	150					15	35	35	35	30	0								0
U 20 Remainder Durranhill	70	70							0	15	35	20								0
U 21 Former Laings, Dalston Road	50	50			0	0	0	0	0	15	35	0								0
Sub total	3645	3635	0	0	4	89	165	255	382	439	494	370	352	316	150	135	135	85	35	229
Delivery																				
Sites with Planning Permission [Over 10]					381	451	374	260	201	135	155	180	164	140	110	110	110	102	50	335
Authority to Issue					0	29	67	72	55	35	35	35	27	0	0	0	0	0	0	0
Allocated Sites					4	89	165	255	382	439	494	370	352	316	150	135	135	85	35	229
Small Site/Windfall Allowance					100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
Carlisle South															250	300	300	300	300	
Projected Delivery					485	669	706	687	738	709	784	685	643	556	610	645	645	587	485	564