

**EXAMINATION OF
CRAVEN LOCAL PLAN (CLP)**

**MATTER 6 – ISSUES 1, 2, 5 & 6
HOUSING LAND SUPPLY**

ON BEHALF OF

MESSRS WILMAN: LAND AT ELSEY CROFT

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1.0 INTRODUCTION

This Hearing Statement is submitted by Carter Jonas LLP for and on behalf of the Wilman Family, owners of land and property, predominantly to the east of Skipton. The Family's interest in the Local Plan specifically relates to the two draft allocations SK089 and SK090, but also the relevant parts of the spatial strategy and policy framework. This Statement responds to selected questions set out in Matter 6 of the Inspectors' Matters and Issues. Other Statements are submitted in respect of: Matter 2 – OAN and the Requirement (Policy SP1); Matter 3- Affordable Housing Requirement; Matter 5 - Residential Allocations; Matter 8 – Housing Mix.

Those Issues and Questions identified by the Inspectors are included in **bold** and *italic* for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of , and should be read in conjunction with the representations submitted to the Pre-Submission Consultation (February 2018) and other Hearing Statements.

Carter Jonas is invited to attend and participate in the relevant Examination hearing sessions.

As a note part of the draft Allocation (the western most field) is in the ownership of Craven District Council. The Agent is aware of a joint venture between Craven District Council and Barnfield Construction to bring their site forward for residential development, and the availability of funding for enabling works to facilitate delivery. That funding is however time constrained. The agent and landowner have indicated that there is no objection in principle for the Council's site to come forward in isolation where it does not prejudice the delivery of the wider allocation and proposals within it. All parties have agreed to an ongoing dialogue.

2.0 MATTER 6: HOUSING LAND SUPPLY

Issue 1 – The Five Year Housing Land Requirement

Q1. What is the basic five-year housing land requirement, what is it based on and how has it been calculated?

Q2. How does the five-year housing land requirement compare to previous rates of delivery?

Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and completion in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and also to ensure choice and competition in the market for land.

Q3. Taking a longer-term view, how has the Council performed against previous annual housing requirements? Does this represent the ‘persistent undersupply’ defined by the Framework? In this context, should the buffer be 5% or 20%?

Q4. If a 20% buffer applies, should this be applied to the basic five-year requirement, or the five-year requirement and any undersupply?

Q5. If there has been an undersupply, should this be addressed within the next five years (the ‘Sedgefield’ method), or over the remainder of the plan period (the ‘Liverpool’ method)? Is the Council’s approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?

Q6. Taking the above into account, what is the five-year housing land requirement?

A housing requirement has been identified for 4,600 net additional dwellings over the Plan period to 2032. This is equivalent to an additional 230 dwellings per annum.

From the draft AMR Table 3 it is apparent that the Council has failed to deliver the minimum requirement since the start of the Plan period (2012). At December 2017 the underdelivery is estimated at around 500 units. In the period it is considered that the only time the completions have met the requirement was 2016/17 and 2017/18; although these are only estimates. The completions do not seek to reduce the backlog.

It would be appropriate that the Council seeks to address the backlog using the Sedgefield method; i.e., within the next five years. Such an approach would be consistent with the Government’s ambition to substantially boost housing supply. Over the longer term the Council has failed to achieve the housing requirement in all but two years (2008/9 and 2011/2) which suggests a persistent undersupply, and the application of a 20% buffer.

Taking into account the draft AMR, the five year housing land requirement is around 1800 units, or 360 dwellings per year using the Sedgefield method and with a 20% buffer.

Issue 2 – Supply Methodology

The PPG states that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

The PPG also advises that the size of sites will be an important factor in identifying whether or not a housing site is deliverable within five years. Plan makers should consider lead-in times and build-out rates to ensure a robust five-year housing land supply. Taking this into account:

Q1. What evidence is there to indicate that the sites with planning permission will come forward as illustrated in the Craven Local Plan Housing Trajectory 2012 to 2032 (2018 Update for Submission)¹⁸?

Q2. Are there any sites in the Housing Trajectory which have a resolution to grant planning permission subject to the completion of a planning obligation? If so, how has this been taken into account in determining deliverability?

Q3. How does the Housing Trajectory take into account sites with outline planning permission, compared to sites with full planning permission?

Q4. What lead-in times and build-out rates have been applied to sites with planning permission?

Q5. Have the same lead-in times and build-out rates been used for sites across Craven? If so, is this appropriate and justified?

Q6. How has the Council calculated the deliverability of sites without planning permission? Have different lead-in times and build-out rates been used?

Q7. How has the Housing Trajectory taken into account that some sites may not come forward due to unforeseen circumstances. Has a lapse-rate or allowance for non-deliverability been applied? If so, has it been applied to all sites?

Q8. Based on the latest evidence available, is the estimated delivery of sites realistic, reasonable and justified?

Document SD04 (Craven Local Plan Housing Trajectory 2012- 2032 - 2018 Update for Submission) sets out the Council's anticipated delivery and trajectory of housing sites. The introduction sets out that the document makes provision for around 2,661 dwellings over the plan period for Skipton as the principal town, which is anticipated to accommodate 50% of the District requirement. Chart 3 sets out how the trajectory for Skipton will play out over the plan period, with a significant boost in the first five years.

Within the accompanying tables the headlines suggest that draft allocations and existing consents will deliver 4,302 dwellings over the remainder of the plan period. Our view is that the Plan should seek to identify sufficient sites to exceed the requirement for the principal town and for windfalls to be seen as a bonus.

Within the individual sites the table identifies site SK089 and SK090 as extending to 6.81has and delivering 218 dwellings; a density of 32 dwellings per hectare. It anticipates that the site will deliver some 110 units in the first five years on the plan period post adoption and 108 in the five year period thereafter. Some 20 dwellings are anticipated to be delivered in the year 2020/21. It is understood that this may be achieved through the early development of the Barnfield Craven JV area of the site.

A concern with the trajectory however, is that the Council is overregging the yield of the site by virtue of the Education Authority's potential requirement for some 1.8has (4 acres) to provide a primary school with possible nursery provision. This would bring the net site area for residential development to around 5.0has. It is expected that the school requirement this will reduce the yield from the site to 132 units (at 32dph); to achieve the Council's yield would require a minimum density of 44dph, which given the topography is unlikely. Within that net area, the Council has also requested green infrastructure and a tree belt.

On this basis it is considered for site SK089/090 the Council's assumptions are not realistic.

Issue 5 – Future Supply

Paragraph 47 of the Framework states that local planning authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, years 11-15.

Q1. How has the Council arrived at the figures in the Housing Trajectory for years 6-10 and 11-15?

Q2. What factors were taken into account in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?

Q3. Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?

Based on the assessment of SK089/090, it is considered that the Council is unlikely to have a sufficient supply of housing land across the lifetime of the Plan. If a lapse rate is then applied for non - or under-delivery the position will only worsen.

Issue 6 – Flexibility

Q1. What flexibility does the plan provide in the event that some of the larger sites do not come forward in the timescales envisaged?

Q2. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

It is considered that the Local Plan should seek to overprovide in terms of the supply of housing land to allow for flexibility and respond to changing circumstances. It is important that the Plan provides for sufficient outlets to meet the requirement, but also to provide a buffer over and above this requirement.

It is important that appropriate targets are introduced and that specific monitoring targets are used to ensure that action can be taken in the necessary timescales. Policies in the Framework suggest that Local Plans should be reviewed at least every five years.

3.0 CONCLUSION

In conclusion we maintain the Local Plan fails to:

- Provide an adequate supply of housing land;
- Apply realistic assumptions, for SK089/090 in particular
- plan positively for housing delivery; and
- provide sufficient flexibility should circumstances change.

Carter Jonas
25th September 2018