

MATTER 6



JohnsonMowat

Planning & Development Consultants

Response to Craven District Council Local Plan Examination Inspector's Questions

September 2018

MATTER 6

Housing Land Supply

CLIENT: KCS DEVELOPMENT LTD

SITE REFERENCE NO: GA025 – LAND OFF SKIPTON ROAD, GARGRAVE



CONTENTS

1.0 INTRODUCTION

2.0 RESPONSE TO INSPECTOR'S MATTER 6 QUESTIONS



1.0 INTRODUCTION

- 1.1 This statement should be read alongside previous representations submitted on behalf of KCS Development Ltd in relation to the emerging Craven Local Plan.
- 1.2 It should be noted that we do not consider it necessary to answer all of the Inspector's Questions. For the avoidance of all doubt those that we do wish to respond to have been set out.
- 1.3 It is not the intention of KCS Development or Johnson Mowat to appear in person at the Matter 6 session; the contents of this Statement should therefore be relied upon.

2.0 RESPONSE TO INSPCTOR'S MATTER 2 QUESTIONS

- 2.1 We have concerns over the Council's current five year housing land supply position. This is not appropriately documented within the Evidence base documents, considering the latest position as of 1st April 2018.
- 2.2 We do however note the Authority Monitoring Report 2016 -2017 (SD003), the Housing trajectory 2012 to 2032 (2018 Update for Submission) (SD004) and the Housing Land Availability Assessment – Update 2018 (Ho010). We understand that a draft AMR 2017 - 2018 may currently be in production.

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 is it calculated?

- 2.3 Notwithstanding our previous comments in relation to the overall housing requirement, the very basic housing requirement should be the annual requirement of 230 net additional dwellings per annum, as set out in Policy SP1.
- 2.4 The basic requirement for any five years within the plan period is therefore $5 \times 230 = 1,150$ dwellings

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

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?¹⁵

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

2.5 As already established the draft Local Plan identifies a housing requirement of 230 dwellings per annum.

2.6 Against the start of the plan period, 1st April 2012, the table below identifies the delivery of homes against this shortfall.

Year	Net Dwelling Completions¹	Housing Requirement	Over / Under Supply	Cumulative
2012/13	118	230	-112	-112
2013/14	36	230	-194	-306
2014/15	128	230	-102	-408
2015/16	187	230	-43	-451
2016/17	230	230	0	-451
2017/18	224*	230	-6	-457
Total	923	1,380	-457	-457

* Predicted housing completion

2.7 The table above clearly demonstrates an undersupply of housing within the plan period. It is recommended that the undersupply of housing is delivered within the next five year period as per the Sedgefield method. This is considered to be in compliance with the Governments ambitions to significantly boost housing supply.

2.8 The AMR also sets out the historic delivery of dwellings in the District at Table 3 (SD003). It is clear that the Council have not met their housing target since the 2008/09 monitoring year

¹ Information taken from last published AMR (December 2017) - Table 3



and therefore have demonstrated 9 years persistent under delivery. It is therefore appropriate to apply the 20% buffer within the Craven District.

2.9 It is noted that the figures listed above as set out in the AMR Evidence Base differ to that set out in the wording of draft Policy SP1. The Policy states:

“Housing Monitoring shows that 768 net dwellings have been completed between 1 April 2012 and 30 September 2017, the balance of the housing provision for the remainder of the plan period to be provided... is therefore 3,832 net additional dwellings.”

2.10 It is our view that this wording should be removed from the policy and the residual housing requirement calculated on an annual basis through the Authority’s Monitoring Report.

2.11 Based on the data set out in Table 1 above the housing provision for the remainder of the plan period is closer to 3,901 dwellings.

Table 2: Five Year Housing Requirement Calculation		
A	Local Plan Housing Requirement (2012 – 2032)	4,600
B	Annual Housing Requirement (4,600 / 20 years)	230
C	Basic Five Year Requirement (230 x 5 years)	1,150
D	Actual Completions 2012 - 2018	923
E	Expected Delivery 2012 -2018 (230 x 6 years)	1,380
F	Surplus / Shortfall (1,380 – 923)	-457
G	Five Year Requirement + Shortfall	1,607
H	20% Buffer	321
I	Five Year Requirement (Basic requirement + shortfall + 20% buffer)	1,928
J	Residual Annual Target for Five Year Period	386

Issue 2 – Supply Methodology

Q1. – 6. Lead in times and deliverability of sites.

2.12 Johnson Mowat have had regard for the supply methodology as set out in the Strategic Housing Land Availability Assessment and consider it to be a broad brush approach to lead in



times and delivery rates. We have found no evidence which relates to site specific evidence received from land owners, developers or interested parties within the Housing Trajectory. As a result it our view that the Housing Trajectory is overly optimistic and not an accurate reflection of the realistic housing delivery in the District.

2.13 Whilst Johnson Mowat have not undertaken a detailed assessment of each of the Council's identified sites within the Trajectory the following concerns are raised:

- Lead in times between approval of outline permission to the delivery of dwelling are not realistic taking into consideration the timings associated with preparation, submission and approval of reserved matters, the discharge of conditions and the implementation and delivery of houses on site.
- A number of permissions have already expired without being implemented and should therefore not be included (eg 8/2015/15067 Low Bentham Road, Bentham (7 dwellings) and 63/2015/15417 Sackville Street, Skipton (43 dwellings)).
- A number of historic permissions have been implemented but there is no evidence of delivery and dwellings are projected to be completed towards the end of the five year period; these sites should be removed (eg 9/2002/1910 Hambleton Garage, Bolton Abbey (6 dwellings), 63/2011/12082 St Monica's Convent, Gargrave (70 dwellings) and 63/2010/10596 Land adjacent to 42 Sackville Street, Skipton (7 dwellings)).
- Lead in times for the delivery of dwellings on proposed housing allocation is extremely optimistic where sites do not currently benefit from planning consent and planning applications are currently not pending consideration (eg GA031 Land West of Walton Close which does not benefit from any planning consent yet is anticipated to deliver 10 dwellings in 2019/20).

2.14 It should be noted that the list above is by no means exhaustive and further sites included within the Housing Trajectory may be subject to dispute.

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?

2.15 Johnson Mowat see no evidence within the Housing Trajectory (SD004) that the Council have incorporated a lapse rate or non-implementation rate to account for non-deliverability. Johnson Mowat would normally expect a lapse rate of at least 10% to be applied across the supply. This lapse rate would allow for changing circumstances which may lead to some sites not being brought forward.



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

- 2.16 We do not consider the evidence presented to be robust in relation to the delivery of the Local Plan Housing Trajectory. We consider the Council to be overly optimistic in the delivery of dwellings, particularly in the first five years of the plan period.
- 2.17 A significant number of the sites identified by the Council cannot be justified for inclusion. Just a small number of these sites are touched upon in paragraph 2.12 above. It is noted that the Inspector has also identified a number of sites of concern including the delivery of dwellings from North Parade, Skipton, Sharphaw Avenue and Station Works Cononley within the Matters Issues and Questions.

Issue 4 – Windfall Allowance

- 2.18 In line with our comments from Matter 4 we are of the view that the delivery of dwellings from Tier 5 settlements within the settlement hierarchy is the equivalent of a windfall allowance.
- 2.19 It would be expected that the Council can provide compelling evidence that these sites continue to provide a realistic source of supply. The Council should monitor the housing provision from windfall sites to understand the delivery of housing from this source of supply.

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?

- 2.20 The Local Plan should provide a housing supply greater than the housing requirement to allow for flexibility and respond to any changes in circumstance. It is therefore important that a buffer over and above the requirement is identified to provide sufficient development opportunities.
- 2.21 Whilst the Council’s housing trajectory states that a total of 5,569 dwellings are identified within the plan period, the sites as identified above cast doubt on the delivery of this figure. It is also noted that the Housing Trajectory identifies the delivery of dwellings in years 7 to 13 to drop below the Plan’s annual requirement of 230 net dwellings as set out in Policy SP1.
- 2.22 It is therefore the view of Johnson Mowat that further development sites should be identified to adequately meet the Local Plan’s housing requirement and to boost the supply of housing in line with the Framework.



2.23 We are aware the HBF would like to see the introduction of appropriate targets and monitoring triggers which provided appropriate actions and timescales should the Council's deliverability falter. We agree with this approach.