



North Yorkshire
Campaign to Protect Rural England

CRAVEN DISTRICT COUNCIL: CRAVEN LOCAL PLAN 2012-2032
EXAMINATION IN PUBLIC

RESPONSE TO INSPECTOR'S QUESTIONS 1 AND 2 IN SUPPORT OF PREVIOUS REPRESENTATIONS MADE BY THE NORTH YORKSHIRE BRANCH OF THE CAMPAIGN TO PROTECT RURAL ENGLAND ('CPRENorthYorkshire')
(Ref: 009/04/SP1/TS)

MATTER 6: HOUSING LAND SUPPLY

Issue 1: The Five-Year Housing Land Requirement

Question 1: What is the basic five-year housing land requirement, what is it based on and how has it been calculated?

Question 2: How does the five-year housing land requirement compare to previous rates of delivery?

The recently published National Planning Policy Framework (the 'NPPF' or the 'Framework') states that for the purposes of examining plans, policies in the previous Framework (2012) will apply where plans are submitted on or before 24 January 2019 (paragraph 214).

CPRENorthYorkshire have provided detailed responses to all of the Craven District Council's ('CDC') consultations on the emerging Craven Local Plan since 2013 and have welcomed the opportunity to do so.

The figures produced by CDC have not been updated since their initial publication in 2017 which identified a housing land supply of 5.49 years. Table 3 of the Council's 'Five Year Housing Land Supply Methodology and Report' shows that the annual average of net completions for five years from April 2012 to March 2017 was 135. Table 1 highlights that the annual average for the previous five-year period was 179 dwellings per annum.

CPRENorthYorkshire responded to the Inspector's Question 1, Issue 7 of Matter 2 in relation to whether the housing requirement is justified. CPRENorthYorkshire believe that the response to that question is also pertinent to the questions set out above. For ease of reference, the response is repeated below, with some additional comments:

Thus far the emerging Local Plan has had 4 differing proposed housing targets. The first figure of 160 was agreed at the first stakeholder and interested parties meeting.

In December 2015, the Council accepted an Objectively Assessed Need of 290 dwellings for the whole of Craven, including within the Yorkshire Dales National Park ('YDNP'). The allocated figure for the YDNP was 34 units per annum, leaving a target of 256 per annum for the area outside of the National Park (5,120 dwellings over the plan period).

The 2016 second draft Local Plan consultation the CDC Housing Position Statement was based on an annual growth figure of 127, adjusted to 117 for the remaining plan period. The annual target of 256, therefore, appeared to CPRENorthYorkshire to be set to fail.

In October 2016, the Government published new figures showing a reduction in housing need and a new Strategic Market Housing Assessment ('SHMA') was commissioned which resulted in a reduction in the housing target to 4,280 over the plan period and 214 dwellings per annum.

In June 2017, CPRENorthYorkshire noted that Section 4 of the third draft Local Plan had been entirely updated since the previous consultation in May 2016. Table 1, within the consultation document highlighted that the annual average net completion rate in Craven between January 2007 and December 2016 was 140.3 units. The Council opted to promote housing growth option C which suggested that there was a need to deliver 4,280 dwellings between 2012 and 2032 (214 dwellings per annum). In line with the SHMA.

Policy SP1 of the 2017 draft plan, set out that 676 net dwellings were completed between April 2012 and March 2017 - which is an average of 135 units per year. CDC therefore stated that there is therefore a need for 3,604 additional net dwellings to be delivered over the remaining 15-year period (from March 2017 - March 2032). When considering Table 2, as set out in the consultation document which sets out the number of extant planning permissions at 1st April 2017, this requires a gross requirement of an additional 2,467 dwellings to be delivered over the remaining plan period (this incorporates a 12% allowance to ensure the net figure is delivered within the plan period).

In July 2017, CPRENorthYorkshire welcomed the lower minimum target but believed that 214 dwellings per annum would prove unviable given the persistent under delivery over many years.

An Addendum to the Local Plan Housing Growth Options Paper was published in January 2018 alongside the Publication Draft Local Plan. This revealed that CDC selected a new growth option which set the requirement at 230 dwellings per annum in order to address past under-delivery rates. CPRENorthYorkshire assert that this remains too high given the past 17 years under delivery as set out at Table 5.16 of the Addendum report. CPRENorthYorkshire believe this was adopted

under pressure from Industry rather than defend their preferred option which was already considered 'high' given the actual deliverable on the ground. CPRENorthYorkshire are aware that the Council needs to plan positively for growth as directed in the NPPF and the PPG, however, they are also required to be realistic and take account of local constraints.

Whilst the Council are required to address undersupply, it is unrealistic to set a housing target at a level which remains high when they are consistently underperforming and not able to achieve this level of housing delivery. Adopting a higher housing requirement would potentially meant he Council would be setting themselves up for further undersupply.

Having carefully considered the information provided in the Addendum report, CPRENorthYorkshire of the opinion that Housing Growth Option B1 should have been selected: 206 dwellings per annum (4,120 dwellings) from 2012 to 2032. This option provides advantages over other options in terms of its lower environmental impact (75% of land take in Craven is National Park, AONB or SSSI); better alignment with the most recent jobs growth forecasts, and with the past 17 years of housing completions in the plan area. It would provide for the full objectively assessed need for housing (FOAN) of the Local Plan (based on the plan area rather than the housing market area).