



Craven Local Plan

HOUSING GROWTH

Evidence Base

Compiled November 2019

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Introduction

This document is a compilation of all housing growth evidence underpinning the Craven Local Plan. The following table describes the document's constituent parts.

Title	Date	Comments
Housing Growth Option Paper (Part I)	June 2017	This is the original paper that supported the June 2017 pre-publication consultation draft of the Craven Local Plan.
Housing Growth Option Paper Addendum (Part II)	November 2017	This addendum was prepared in response to concerns raised during consultation on the June 2017 pre-publication draft Craven Local Plan and in response to updated evidence on demographics, jobs growth and housing need. The original paper and this addendum should be read together.

Part I: Housing Growth Option Paper

June 2017



Craven Local Plan; Housing Growth Option Paper: June 2017

1.0 Introduction

- 1.1 The construction of new homes during the plan period has a crucial role in ensuring that the population of the Craven¹ can be accommodated in suitable housing and also in securing the economic well-being of Craven District as a whole. The Council has the responsibility to set its own housing requirement and providing the right number of homes is a major challenge for the Craven Local Plan.
- 1.2 The Council has undertaken its own up to date technical assessment of the number of homes it needs for the period between 2012 and 2032. This is referred to as the 'full objectively assessed need' (FOAN) for housing. This paper draws upon the Council's technical assessment of FOAN and then assesses what policy and other considerations affect the Council's decision on what the Local Plan's housing requirement should be.
- 1.3 This paper concludes there are four housing growth options that should be evaluated before a decision is made on the plan's housing requirement. These are evaluated through a sustainability appraisal of each option and further analysis of their relationship with planning policy, and other considerations, including deliverability.
- 1.4 Finally, the paper concludes on why the Council has chosen one of these housing growth options as its Local Plan housing requirement and why it has rejected the other options. The housing requirement will be reflected in the Draft Craven Local Plan Policy SP1.

2.0 Context: Plan preparation.

- 2.1 The Localism Act 2011, the publication of the National Planning Policy Framework (NPPF) in March 2012 and the abolition of Regional Spatial Strategies in 2013/14/15 heralded a new era for development plan making. The responsibility for determining the number of new homes to be planned for within a local planning authority such as Craven was transferred from the Regional level and Regional Spatial Strategies, to the local planning authorities themselves.
- 2.2 In the autumn of 2012 Craven District Council started the process of consultation on what should be the spatial strategy and housing requirement for the Craven Local Plan; an area which does not include that area of the District within the Yorkshire Dales National Park (YDNP). This part of the District is under the land use planning control of the Yorkshire Dales National Park. At the time the plan looked forward to the year 2026. The consultation was called "Shaping a Spatial Strategy and Housing Figure". The structure and results of this, and other consultations referred to below, as well as the evidence provided to support these consultations, are published on the Council's website at www.cravencd.gov.uk/newlocalplan.

¹ Craven District outside the Yorkshire Dales National Park

- 2.3 The evidence provided by the Council on housing need for the 2012 consultation was the following:
- The North Yorkshire and York Strategic Housing Market Assessment (SHMA) 2011,
 - Craven District Population Estimates and Projections March 2012.
- 2.4 Various growth options were put forward with discussion papers published suggesting that the most appropriate level of growth was between 137 and 208 dwellings per annum (dpa). Craven District as a whole was considered to represent an appropriate housing market area for assessment and these figures included that part of the District within the YDNP. For the purposes of public consultation in 2012 the Council sought views on whether the average of the two figures, minus the need for new homes in the YDNP was an appropriate level of housing growth to plan for. That figure was 160 dpa. The same consultation looked at how the level of growth might be distributed across the local plan area i.e. the spatial strategy.
- 2.5 The Craven Spatial Planning Sub Committee (CSPSC) were provided with feedback from the consultation and on 8 October 2012 resolved to use 160 dpa (minimum) for that part of the Craven District outside the YDNP as the draft housing figure for the purposes of further consultation.
- 2.6 The public consultations on the Craven Local Plan during 2013 and 2014 again used the housing figure of 160 dpa. The 2014 Draft Craven Local Plan (DCLP) looked forward to 2030.
- 2.7 On 25 February 2015 the CSPSC received a report on the results of the DCLP consultation and this report recommended the way forward for plan preparation. A major issue was the need, since the publication of the NPPF and associated National Planning Practice Guidance (NPPG), to update the Council's SHMA in accordance with these changed national requirements. Otherwise the plan was at risk of being found unsound at examination.
- 2.8 Hence the figure of 160 dpa was reviewed through the evidence provided in the Council's updated Strategic Housing Market Assessment (SHMA) of June 2015. In November 2015 and December 2015 the Council's Policy Committee and full Council respectively agreed that the objectively assessed need for housing over the entire District was 290 dpa, but that a housing target for the Craven Local Plan should be based on a lower figure of 256 dpa. This again reflected the estimated objectively assessed housing needs for the District outside the YDNP.
- 2.9 Further consultations on the DCLP took place during 2016 using the above revised housing figures and other new and revised evidence to inform plan making. The first consultation took place during the Spring and as well as publishing a pool of site options for potential development, it put forward draft policies with their explanatory text and the draft policies map (excluding development land allocations) and undertook a sustainability appraisal of these policies. Draft Policy SP1: Meeting Housing Need reflected the latest SHMA figures referred to above for objectively assessed housing need of the plan area. This policy was the subject of a sustainability appraisal which assessed the sustainability of the (256 dpa/5,120 dwelling provision 2012 to 2032) and higher and lower targets for new dwelling provision across Craven. A second consultation in the summer 2016 put forward preferred options for housing development. However, following a legal challenge to this consultation, the Council has accepted that it should undertake to re-consult on preferred options.
- 2.10 In July 2016, the Department of Communities and Local Government (DCLG) released updated 2014 based household projections and the Council sought to ensure, as required by the NPPF, that the Local Plan was based on the latest household projections as well as consideration of the impact of the result of European Union Referendum in June 2016.

- 2.11 Hence the following three reports have been published to support the forthcoming Draft Craven Local Plan for consultation in Summer 2017 and formal publication of the plan later in the year:
- Craven District SHMA Update 2016
 - Craven District Demographic Forecasting Update: August 2016
 - Craven District Demographic Forecasting Update Addendum: October 2016
- 2.12 The latter took account of the first post 'Brexit' forecasting of the regional econometric model for Yorkshire. The SHMA took account of the two demographic forecasting updates. This SHMA Update forecast up to the year 2032.
- 2.13 The Council's Policy Committee on 13 December 2016 accepted the results of the Craven District SHMA 2016 Update as forming part of the evidence base for the Craven Local Plan and agreed that, for the purposes of the preparation of a further draft of the Craven Local Plan for informal consultation, a minimum housing requirement target of 4,280 net new dwellings is used for the period 2012 to 2032. This is a net annual average of 214 dwellings per year.
- 2.14 Unlike the figures of 160 dpa and 256 dpa agreed in earlier Council decisions on the Craven Local Plan referred to above, this figure of 214 dpa is the full objectively assessed need (FOAN) for new homes in the whole of Craven District, including that area covered by the Yorkshire Dales National Park (YDNP). This paper reviews that decision in the light of new information derived from recent Inspector's reports on the soundness of Local Plan housing requirements and a High Court decision on the same matter.

3.0 Addressing the need for affordable housing in the Craven Local Plan.

- 3.1 Since the Council's Policy Committee decision in December 2016, a High Court decision published on 25 November 2016 and a number of Local Plan Examination Inspector's reports have come to the Council's attention. These affect how the Council should consider the Craven Local Plan's housing requirement compared to its previous analysis. The High Court decision relates to the case between the trustees of the Barker Mill Estates; Test Valley Borough Council (TVBC) and the Secretary of State for Communities and Local Government. Here, the soundness of the Revised Test Valley Local Plan was challenged and the Local Plan sought to be quashed. In relation to one of the grounds for challenge, the Claimants complained that TVBC failed to comply with the requirements of the NPPF that, in preparing and adopting a local plan, the plan-making authority must identify the full objectively assessed housing need (FOAN) for its district.
- 3.2 The key lesson learnt from TVBC's and the Examination Inspector's application of the NPPF and the PPG for the Craven Local Plan is that, prior to a decision on the plan's housing requirement, it is advisable that the Council gives consideration as to whether the plan could meet the separately assessed need for affordable housing (FOANAH) as well as meeting the overall need for housing (FOAN). Both 'needs' have been identified in the Councils SHMA 2016 Update, and this paper addresses the issue of meeting these housing 'needs'.
- 3.3 The Examination Inspector's report into the soundness of the Yorkshire Dales National Park Local Plan was published on 15 December 2016. This Inspector's report also highlights the importance of plan preparation considering whether the plan can meet the separately assessed needs for affordable housing.

4.0 The National Planning Policy Framework (NPPF)

- 4.1 The NPPF states that local plans should facilitate the delivery of the homes needed in the plan area within the plan period.
- 4.2 To do so - local planning authorities (LPA's) should have a clear understanding of housing needs in their area and they should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

- 4.3 The National Planning Policy Framework (NPPF) requires LPA's to prepare a SHMA that

“should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the needs for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own home; and*
- *caters for housing demand and the scale of housing supply necessary to meet this demand.*

(NPPF para 159).

- 4.4 Para 14 of the NPPF states that:

*“At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan making and decision taking.*

*For **plan-making** this means that:*

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole; or

specific policies in this Framework indicate development should be restricted”.

- 4.5 Para 47 of the NPPF seeks to boost significantly the supply of housing by requiring LPA's, amongst other matters, to

- prepare Local Plans that meet the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF.
- identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement.

- 4.6 In 2014, the Court of Appeal held that the provisions of the NPPF require a two stage approach to be followed by the LPA when identifying a housing requirement in a local plan. (Solihull MBC v Gallagher Estates Ltd (2014) EWCA Civ 1610).
- 4.7 The first stage involves the LPA establishing the full objectively assessed need for housing (FOAN) which disregards policy considerations and other matters such as land availability. This is called the 'policy off' stage. The second stage involves the LPA considering whether policy or other considerations justify constraining (or increasing) the FOAN so as to arrive at the amount of housing which the local plan will require to be provided. This is called the 'policy on' stage. These two stages are now applied in this topic paper for the Craven Local Plan.

5.0 Applying the NPPF to the Craven Local Plan: Stage One.

The Objectively Assessed Housing Need for the Craven Local Plan 2012 - 2032

- 5.1 The Council's SHMA Update 2016 has been prepared in accordance with the NPPF and the detailed guidance contained in the Government's Planning Practice Guidance (PPG) and takes account of the Planning Advisory Service (PAS) *Objectively Assessed Need and Housing Targets Technical Advice Note*, Second Edition, July 2015; and the *Local Plan Experts Group (LPEG) report Local Plans: report to the Communities Secretary and the Minister of Housing and Planning*, March 2016.
- 5.2 The SHMA 2016 Update concludes that Craven District is an appropriate housing market area (HMA) for the purposes of Local Plan policy making. Therefore the responsibility for meeting the housing needs of this HMA lies jointly with the two local planning authorities of Craven District Council and the Yorkshire Dales National Park Authority (YDNPA). (The YDNPA acts as the local planning authority for that part of the Craven District which lies within the YDNP).
- 5.3 In paragraphs 6.34 and 6.35 of the SHMA 2016 Update it concludes that the following are the FOAN figures for the different parts of the District wide HMA:

Craven Local Plan Area:

- 3,640 net new dwellings between 2012 and 2032 equating to an annual average of 182 dwellings.

Craven District (within the YDNP):

- 640 net dwellings between 2012 and 2032 equating to an annual average of 32 dwellings.

Craven District:

- 4,280 net new dwellings between 2012 and 2032 equating to an annual average of 214 dwellings.

- 5.4 In the knowledge that the YDNPA now has an adopted Local Plan which runs through to 2030 (only 2 years less than the plan period for the Craven Local Plan) and promotes the meeting of more than its own housing needs within the National Park, it is considered reasonable for this Council to adopt the Craven Local Plan Area FOAN of 182 dpa (3640 dwellings from 2012 to 2032) as its starting point for the consideration of housing growth options. More detail on the YDNPA's Local Plan is given below.

- 5.5 Hence for the purposes of meeting the requirements of paragraph 47 of the NPPF, the FOAN for the preparation of the Craven Local Plan is the provision of 3,640 new dwellings between 2012 and 2032 equating to an annual average of 182 dwellings.

6.0 Applying the NPPF to the Craven Local Plan: Stage Two (Part A).

Setting the housing requirement for the Craven Local Plan.

What should be the housing growth options?

- 6.1 This part of the process involves the assessment of whether policy or other considerations justify constraining (or increasing) the FOAN so as to arrive at the amount of housing which the local plan will require to be provided. The following factors are relevant to consider here:
- Housing need and delivery in adjacent local planning authorities
 - Addressing the need for affordable housing
 - Housing and economic strategy, policy and related evidence.
 - Delivery: Land availability and suitability for housing.
 - Delivery: Past rates and the housing market
 - Environmental impact
 - Infrastructure

Housing need and delivery in adjacent local planning authorities

- 6.2 A Duty to Co-operate statement (DtC) has been published by the Council as part of the Summer 2017 plan consultation. Through discussions with other planning authorities and other relevant organisations the DtC identifies those issues of cross boundary relevance to plan making in Craven District and adjoining local planning authorities. Apart from housing need and deliverability in the Yorkshire Dales National Park Authority (YDNPA) area the DtC does not identify the housing need of any other adjacent local planning authorities as a matter which should affect this District's housing requirement. On 15 December 2016 the YDNPA received the Local Plan Examination Inspector's Report which, subject to a number of modifications, concluded that the YDNPA's Local Plan was sound.
- 6.3 The housing need picture in the YDNP is not straightforward. The YDNP falls within four different housing market areas (HMA's). These are Craven District, South Lakeland District, Lancaster City and Richmondshire. There are acknowledged difficulties in splitting the housing need below the level of HMA's and under these circumstances at the recent examination into the YDNP Local Plan, the YDNPA were reluctant to adopt a full objectively assessed housing need (FOAN) figure for their Local Plan. However, the Inspector considered it necessary to do so in order to comply with the NPPF. He concluded that a range of 32 to 38 dpa should be regarded as the FOAN for the purposes of the Local Plan.
- 6.4 The Inspector's examination report went on to conclude that the critical point is that the plan's housing requirement should meet the identified FOAN. At the examination the YDNPA were promoting a housing requirement of 55 new dwellings per year for the period 2015 and 2030 and clearly this more than meets the Inspector's assessment of the FOAN for the National Park of between 32 and 38 dwellings per annum.
- 6.5 The Inspector concluded that this housing requirement "provides a 'buffer' which bolsters confidence that the Plan will meet housing needs, helping to stabilise the population and meet the objective of helping to make the Park a more attractive option for young adults and

people of working age to live in.” In setting the Craven Local Plan housing requirement the Council would not wish to undermine this key objective of the YDNPA’s Local Plan.

- 6.6 The YDNPA in their Local Plan, rely on a significant level of windfall development to deliver their target of 55 dwellings per year, particularly in the latter part of the plan period. In pointing out his concerns on this issue the YDNPA put forward at the examination as a main modification to the plan that Policy C1, which includes the sites allocated within the policy, should be reviewed within 5 years of the plan’s adoption. This main modification has been found necessary by the Inspector to make the plan sound.
- 6.7 Another main modification recommended by the Inspector to make the YDNP Local Plan sound is the following statement. *“The Plan recognises that some open market housing is now necessary to make sites financially capable of delivering affordable housing. However, the likely scale of development and strong housing market makes it unlikely that all housing demand can be met inside the Park.”*
- 6.8 Hence, the Inspector has endorsed in the YDNPA Local Plan a housing requirement higher than the FOAN in the National Park to maximise the chances of achieving one of the plan’s key social objectives, yet at the same time acknowledges that some of the National Park’s housing demand may be met outside the Park.
- 6.9 However, the YDNPA consider that the 55 dpa housing requirement is robust in terms of deliverability and paragraph 4.3 of the now adopted YDNP Local Plan states *“The housing target for the local plan area is set at an annual average of 55 dwellings per annum. This is a net figure and will be measured over the year by comparing new dwellings completed to demolitions and change of use to non-dwelling uses. This can be disaggregated into the three main housing market areas of Richmondshire (18), Craven (27) and South Lakeland (10). The target of 55 is almost twice the projected rate of household growth up until 2030 but still only half the estimated shortfall of affordable housing. It is, however, equivalent to the average rate of actual housing completion over the last 12 years, so is firmly rooted in deliverability”.*
- 6.10 The close relationship of the housing market either side of the administrative boundaries of CDC and YDNPA and some concern by this Council about the reliance of the YDNPA Local Plan on windfall housing suggest it may be appropriate for the Craven Local Plan to provide for a slightly higher housing supply than that of the FOAN for the Local Plan area itself. However, any higher than FOAN provision for the Craven Local Plan should not undermine the YDNP Local Plan’s objective of making the Park a more attractive option for young adults and people of working age to live in.

Addressing the need for affordable housing

- 6.11 In following the requirements of the NPPF and NPPG, all Strategic Housing Market Assessments (SHMA) must provide housing figures which estimate the overall full objectively assessed need for housing (FOAN) and also a separately assessed need for affordable housing (FOANAH) for each District/Housing Market Area (HMA). Where the affordable housing need can be met because it is viable to provide sufficient affordable homes on sites that will be developed to meet the overall FOAN, then both market and affordable housing needs will be met. Where this is not the case, and there are no other ways of meeting the need for affordable homes, then Councils must consider the option of seeking to deliver more homes than the overall FOAN to meet affordable housing needs.

- 6.12 The overall Craven District HMA FOAN is estimated as 214 dwellings per annum (4,280 dwellings between 2012 and 2032), and the need for affordable housing, assessed separately within the SHMA 2016 Update is 145 dwellings per annum. This level of affordable housing need provides the Council with a strong justification to negotiate, subject to viability and site size, that a proportion of private sector market housing proposals should be for affordable housing. This type of provision of affordable housing is likely to continue to be the main source of such new homes in the District. The Council has undertaken a Local Plan Viability Assessment which concludes that, including the other proposed planning obligations in the Craven Local Plan, 40% of private sector market housing schemes on greenfield land can be developed for affordable housing at a viable level. A higher percentage of contribution towards affordable housing is not recommended as this would run too high a risk that landowners would not come forward with land for housing. .
- 6.13 The SHMA 2016 has not provided a separate affordable housing need for the Craven Local Plan area. The figure of 145 affordable houses per annum is for the District as a whole, including the YDNP area within Craven District. Hence it is not currently possible to compare the Local Plan area's FOAN of 182 dwellings per annum (dpa) with the same area's FOANAH. Hence this comparison and an assessment of how many new homes would have to be built to meet the need for affordable homes has to be undertaken at District wide level.
- 6.14 Assuming 40% of the total new dwellings being built out as affordable homes the annual average of 214 dpa, would provide for 86 affordable homes per annum. This is 59 dwellings below the affordable housing FOAN for the District as a whole of 145 dpa. This being the case and wishing to avoid the risks in connection with site viability and deliverability, the only way of meeting the FOANAH would be to significantly increase the OAN figure for the District of 214 dpa.
- 6.15 To comply with the NPPF and PPG, the above circumstances mean that the Council should consider the impacts and deliverability of a housing target that is likely to meet or get close to meeting the separately assessed need for affordable housing (FOANAH). For the purposes of this consultation a range of between 350 and 400 dpa has been used as being able to meet or come close to meeting this need. This is based on a simplistic calculation based on an assumption that all the new dwellings coming forward during the plan period would provide for 40% affordable homes. Hence 40% of 350 dpa and 400 dpa would result in the provision of 140 and 160 affordable homes per annum respectively. This may be an underestimate of the 'real world' yield because some sites may have abnormal costs that will reduce site viability and this will require the Council to be flexible in terms of its package of normal planning obligations, including affordable housing. Also a number of sites developed during the plan period will be below the planning obligation threshold of 5 or less dwellings within Designated Rural Areas and 10 or less dwellings outside Designated Rural Areas.
- 6.16 However as a guide range for the purposes of the Council's sustainability appraisal and a deliverability/policy objective assessment at this stage, these figures are considered adequate. If this range of housing development is found to represent sustainable development and deliverable, then further work can take place to provide a more accurate calculation.

Housing and economic strategy, policy and related evidence.

- 6.17 The Draft Craven Local Plan Vision, Objectives and Strategic Policies (Spring 2016 and Summer 2017 consultations) seek to ensure that local needs are met for new homes and economic development. The Council is not seeking to promote a step change or uplift in the District's economic activity and a related increase in migration levels over the plan period either

through the Local Plan or its Economic Development Strategy (2010 to 2016). Indeed, the Craven Employment Land Review March 2017 clearly states that the focus of the Council's economic strategy, rather than any step change in the District's economic profile, is on enhancing and improving existing skill levels of the resident workforce and enabling local companies to expand and meet their growth aspirations within the District.

- 6.18 Nevertheless, there is a falling resident workforce with forecasts for an increasingly high proportion of elderly residents creating an imbalanced age profile over the plan period. The house prices and rents relative to incomes are high and many young people and families are already priced out of the housing market.
- 6.19 The provision of the right mix, number and tenure of new homes will help rebalance the age profile of the area, maintain mixed and balanced communities and improve the supply of local labour for businesses. These are the same strategic objectives for Craven District in the York, North Yorkshire and East Riding Housing Strategy (2015 to 2021).
- 6.20 The evidence from the Experian Regional Econometric Model (REM) for Yorkshire and Humberside in 2014 (as set out in the SHMA 2016 update) indicated the potential for a high level of economic growth in the District during the plan period. This high level of economic growth would have suggested an average annual dwelling requirement of 238 dwellings per annum to support such economic activity in the District. However, this evidence is now questionable and reduced estimates of job growth from the 2016 REM no longer support a higher than FOAN housing requirement.
- 6.21 Indeed, the latest and most appropriate 2016 REM job growth forecasts contained within the SHMA 2016 Update suggest a much lower job growth than the 2014 forecasts and a much lower annual housing number required to support such job growth. The housing numbers required to support these job growth forecasts as set out in Table 6.3 of the SHMA 2016 are 147 and 150 dpa. This suggests, that in the interests of balancing the latest job growth forecasts with the housing requirement and minimising the likelihood of out commuting, a lower than FOAN housing requirement should be assessed.

Delivery: Land availability and suitability for housing.

- 6.22 The Council's Strategic Housing Land Availability Assessment (SHLAA) provides a list of sites (with accompanying site maps and details) suggested to the Council by a wide range of organisations and landowners as having potential for future housing development. The SHLAA assesses these sites in relation to their availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The SHLAA database informs the Council's assessment of the District's 5 year housing land supply.
- 6.23 The Council's SHLAA of 2012 is currently being updated and will be published alongside the Publication Draft Plan. Whilst the updated SHLAA is not formally published as part of the Summer 2017 plan consultation, officers are aware that the amount of available land, is not in itself a constraint to the growth level associated with Craven's FOAN of 182 dwellings per annum from 2012 to 2032.

Delivery: Past rates and the housing market

- 6.24 The NPPF states that Local Plans should be deliverable. As well as ensuring that a plan is viable an important part of decision making on delivery relates to whether there is likely to be a market for the construction of the number of private dwellings which a housing requirement would set.

- 6.25 In this respect it is useful to look at the Local Plan area's housing completion rates in the past and compare these with the area's FOAN and the housing requirement.

The table below sets out these figures from 2007/8 to 2016

Year	Net dwelling completions (outside the YDNP)	Housing requirement (District as a whole)
2007/08	134	250 (Regional Spatial Strategy (RSS))
2008/09	278	250 (RSS)
2009/10	79	250 (RSS)
2010/11	127	250 (RSS)
2011/12	240	250 (RSS)
2012/13	118	To be determined
2013/14	35	To be determined
2014/15	109	To be determined
2015/16	188	To be determined

- 6.26 These past delivery rates indicate some concern over the market being able to provide for the Local Plan area's FOAN of 182dpa. The average annual delivery rate over these nine years is 145 dpa. Based on this past delivery rate and the latest jobs growth forecasts stated earlier there is a case to consider a lower than FOAN housing growth option.

Environmental impact

- 6.27 If significant adverse environmental impacts were likely as a result of having to meet the Local Plan's housing needs (FOAN) this could be a reason to reduce the Plan's housing requirement below the FOAN. Furthermore, the meaning of part of para 14 of the NPPF (quoted earlier in this report) is that a Local Plan's housing requirement may be lower than the FOAN if "specific policies in this Framework indicate development should be restricted." The NPPF clarifies this statement by giving examples of these types of policies. *"For example, those policies relating to sites protected under the Birds and Habitats Directives (see para 119) and/or designated Site of Special Scientific Interest, land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets and locations at risk of flooding or coastal erosion."* (The Housing White Paper, February 2017 is proposing amendments to the wording of Paragraph 14 of the NPPF).
- 6.28 The Local Plan, through its scoping of the Plan's Sustainability Appraisal and its emerging Appropriate Assessment, has identified the natural resources and environmental designations within and adjoining Craven. This work has identified many environmental sensitivities which the Local Plan must take account of. However, it is considered that new housing developments to meet the FOAN of 182 dpa can be located to avoid and be sufficiently distant from those critical natural designations referred to in the NPPF and provide for a sustainable pattern of growth, close to jobs, shops and services.
- 6.29 Therefore, on the basis of the existing evidence and subject to the results of the housing growth and site specific sustainability appraisal, it appears unlikely that there will be a level of

environmental harm to warrant a lower than FOAN for the Local Plan's housing requirement when comparing that harm with the provisions of the NPPF.

Infrastructure

- 6.30 The need to secure the provision of appropriate infrastructure to support housing and economic growth is a critical part of a Local Plan. Through the Council's dialogue with infrastructure providers and services, including gas, electricity and water utilities, education and highway authorities on the impact of development proposals there are infrastructure needs associated with the FOAN growth levels. However these can be met through a variety of sources of funding, including the Local Plan policies to secure developer contributions from new housing developments. It is envisaged that land can be made available for the level of infrastructure requirements. The Council has published a Draft Infrastructure Delivery Plan as part of the Summer 2017 plan consultation and this sets out the draft infrastructure requirements for the District during the plan period. The IDP is a 'living' document which will respond to the growth levels proposed during iterations of the draft plan.
- 6.31 There is no evidence or information currently provided by relevant organisations to suggest that infrastructure requirements should constrain the level of housing in the Plan area below the FOAN.
- 6.32 The assessment of the above policy and other considerations indicates that the following housing growth options should be the subject of further analysis and a sustainability appraisal.
- **Housing growth option A: 145 dwellings per annum from 2012 to 2032 (2,900 dwellings)**

(This growth option is below the level of the FOAN for the Craven Local Plan Area, but is based on the annual average number of dwellings completed (net) over the past 9 years and broadly reflects the number of dwellings required to support the latest job growth forecasts for the District)
 - **Housing growth option B: 182 dwellings per annum from 2012 to 2032 (3,640 dwellings)**

(This option represents the FOAN for the Craven Local Plan Area, but excludes provision for the housing need of that part of the District within the Yorkshire Dales National Park (YDNP))
 - **Housing growth option C: 214 dwellings per annum from 2012 to 2032 (4,280 dwellings)**

(This option represents the FOAN for the whole of the Craven District (including that part of the District within the YDNP))
 - **Housing growth option D: 350 to 400 dwellings per annum from 2012 to 2032 (7,000 to 8,000 dwellings)**

(This growth option would result in the potential for the Local Plan area/ the District to meet all its need for affordable housing (FOANAH))
- 6.33 The Sustainability Appraisal of these growth options is set out in the **Annex 1** to this paper.

7.0 Applying the NPPF to the Craven Local Plan: Stage Two (Part B).

Selecting the Preferred Housing Growth Option (The Draft Housing Requirement)

7.1 This section of the paper draws on the results of the Sustainability Appraisal and the earlier contents of this paper to conclude on what the preferred housing requirement for the Craven Local Plan should be.

7.2 It is divided into the following headings:

- Environmental considerations
- Social considerations
- Economic considerations
- Other considerations: Delivery (including viability and land availability)
- Other considerations: Council strategy, policy and evidence base.
- Other considerations: Housing in the Yorkshire Dales National Park

Environmental considerations

7.3 The Sustainability Appraisal (SA) of the four housing growth options indicates that, in general terms, the higher the scale of housing growth the greater the anticipated adverse environmental effects. Clearly, the greatest adverse impact on the countryside and natural interest is anticipated from the housing growth option D of between 350 and 400 dwellings per annum. Similarly option D is anticipated as having the greatest adverse impact of all the options on climate change, the conservation of water resources, air quality and noise levels and the minimisation of waste. The environmental impact of the other options increases from Option A to B and then C, with Option A having the least impact on the environment and Option C having the highest impact of these three options.

7.4 In respect of the SA assessment of each option against connectivity and reduction in the need to travel, the results are somewhat inconclusive, being to a large extent dependent upon the location of new housing. Nevertheless the SA concludes that the higher the level of housing growth and population the greater the need to travel. Notwithstanding the reasonable logic of this general position on travel needs, the latest evidence from the Regional Econometric Model (REM) on jobs growth forecast in Craven District, (SHMA 2016 Update) suggests that Option A could be the housing growth closest of all the growth options to the population numbers required to support the number of jobs in the District. If this relationship of homes to jobs is realised, Option A has the greatest potential to minimise the length of travel to work journeys and out of district commuting. On this element of travel needs alone, Option A offers the potential for the least increase in CO2 emissions and least impact on climate change. If these latest jobs growth forecasts are realised, Options B and C, it is likely that a higher level of out of district commuting would take place compared to Option A. This increase in travel may be mitigated somewhat in options B and C with a proactive economic strategy for the District and the creation of a good portfolio of new employment sites. However the scale of the housing growth under Option D is such a large number (200 to 250 dwellings per annum higher than that needed to support the latest job growth forecasts for Craven), that the potential levels of out commuting could be very high with little or no prospect of mitigation through higher levels of economic growth in the District.

7.5 In addition to the SA for each growth option, it is useful to look at an important issue in the NPPF on providing for sustainable development in terms of the environment. One of the key

factors in determining the sustainability and suitability of site options for new residential development has been the strong preference of the Council to avoid areas within the Environment Agency's (EA) higher flood risk zones of 2 and 3, and land within high to medium risk of surface water flooding. This is in accordance with the NPPF paragraph 101 which states that *"Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with lower probability of flooding."* This issue is considered particularly important in Craven following recent flood events in 2015 and the potential for increases in land take within these higher risk flood areas through climate change.

- 7.6 To take this issue into account here, reference is made to the Local Plan Background Paper entitled 'The Residential Site Selection Process' (RSSP) published as part of the Summer 2017 plan consultation. This RSSP paper explains the Council's approach to the selection of the plan's preferred housing allocations. This process starts with consideration of all the sites in the Council's Strategic Housing Land Availability Assessment (SHLAA) database, and thereon through a two stage and multi-level selection process resulting in the plan's preferred housing allocations. In summary, those sites in the SHLAA database which have failed to pass the Stage 1 (Level 1 and 2) Sustainability Appraisal tests are considered to be unsustainable and unsuitable to be allocated for new housing. This leaves a 'pool of sites' at Stage 1 (Level 3) from which the Council has selected the plan's preferred housing allocations. It is this 'pool of sites' which represents the Council's view of what the current capacity of the Local Plan area is to provide for sustainable residential development up to 2032. It is this 'pool of sites' therefore that is relevant to consider in connection with the decision making on the plan's housing growth options. Stage 2 of the process, which leads to the selection of the plan's preferred housing allocations, is described in the RSSP. It is not necessary to reference this stage here.
- 7.7 Hence a preliminary assessment of the amount of land covered by the 'pool of sites' that lie outside the EA's flood zones 2 and 3, and land with medium to high risk of surface water flooding has been undertaken. The land outside these zones/areas is therefore within the EA's flood risk zone 1 and areas of low risk of surface water flooding. The Council have combined these two classifications to form its own classification of land of 'low risk from flooding'. This is considered to be in synergy with the above paragraph of the NPPF which does not differentiate between the two types of flooding. The conclusions of this assessment and an assessment of the amount of land, as at 31 March 2017, that would be required to be allocated to meet Housing Growth Option D in Skipton, is provided below.
- After taking account of completions between 2012 and 2017, outstanding planning permissions at 31 March 2017, and adding an allowance to ensure the plan would be delivering a sufficient net dwelling increase,
 - Housing Growth Option D (the lower end of the range - 350 dpa) would require the plan to allocate land for about 4360 new dwellings in Skipton to conform with the plan's spatial strategy (50% of the plan's housing requirement is to be provided for in Skipton).
 - After excluding all land within the higher flood risk areas described above from the Council's 'Pool of Sites' there would remain about 70 hectares of land available for development. If all this 70 hectares of land was suitable for development at 32 dwellings per hectare then a
 - housing supply of 2240 dwellings could be provided for on low flood risk land (see note below).
 - Hence, to get even close to providing for this level of growth very large areas of land of higher flood risk would have to be built on. Alternatively, significant increases in

housing land would have to be provided for in the District's smaller settlements. Neither of these options is considered sustainable.

- 7.8 **Note re 2240 dwelling yield from low risk flood areas in Skipton:** There are of course other important sustainability issues, including impact of heritage, landscape and the natural environment, that the RSSP and the plan's Sustainability Appraisal have identified and taken into account. These issues mean that, on other environmental considerations the 'real' dwelling yield is likely to be substantially reduced.
- 7.9 With the above proviso, the above amount of land in low flood risk areas could accommodate more than enough land required for Skipton in Housing Growth Options A, B and C.

Social considerations

- 7.10 The SA indicates that the higher the housing growth the greater the contribution that can be made toward the full objectively assessed needs for affordable housing (FOANAH). Option D may well provide for all the FOANAH. In contrast, Option A would fail to meet, and be at least 37 dpa short of meeting, the full objectively assessed need for housing (FOAN) and result in a very large shortfall of affordable homes compared with the assessed need. Options B and C would, respectively, meet the FOAN (overall housing need) for the Local Plan Area (excluding the National Park) and the District as a whole. However neither would meet the FOANAH (need for affordable housing). Option C would contribute towards a higher level of affordable housing than Option B.
- 7.11 The SA indicates that Options B and C would provide best for a balanced population, stemming the influence of an ageing population and maintaining economic activity. These Options have also been assessed as least likely to result in poor access to essential services and most likely to promote physical, mental and social health and wellbeing.

Economic considerations

- 7.12 The SA indicates that increasing housing numbers will generally have an increasingly positive impact on the economy. Increased jobs will be created in the housing construction industry and increased numbers of residents will result in additional spending in local shops and services. However the highest housing growth option, Option D, is significantly out of balance with the latest forecast for jobs growth in the District. Options B and C would also result in higher housing growth than would be required to support the latest job growth forecasts. However the imbalance attached to these Options is relatively small compared to Option D and they provide a level of housing growth which would offer some useful flexibility were the latest job forecasts found to be an underestimation of future workforce requirements in the District.

Other considerations: Delivery (including viability and land availability)

- 7.13 Housing Growth Option A was identified as an option to consider in plan preparation because of past completion rates for new homes which reveal generally lower levels of house building per annum than the FOAN (see table earlier in this report). Clearly, if historic conditions are repeated in the future, there would be concern that significantly higher growth options may not be deliverable. However the 9 years of past completion rates referred to earlier in this paper cover a period of unprecedented economic recession which has driven down housing completions across the country. Furthermore this period spans the time when housing land allocations in the existing Craven Local Plan were virtually all developed and there was very little planned forward supply of housing land.

- 7.14 Whilst 'Brexit' will provide uncertainty in the economy for some years yet, there are signs of a recovery in the housing industry and both the major parties in the forthcoming General Election are promoting high levels of house building. The Council will soon be publishing its Local Plan providing a commitment for a 15 year supply of housing land through a comprehensive set of site/land allocations. It is therefore considered reasonable to be optimistic that delivery rates will increase over the plan period compared to the rates of the last 9 years. Even within the last 9 years of economic uncertainty two years have seen the building of well over 200 dwellings in the District.
- 7.15 Therefore in terms of the capacity and appetite of the market in the District to build residential development, it is considered that Housing Growth Options A, B and C are deliverable.
- 7.16 Housing Growth Option D would be promoting the construction of between 350 and 400 dwellings per annum. To deliver this option, between 205 and 255 dwellings per annum above the 9 year annual average of 145 dpa would have to be built. This appears unrealistic and incompatible with the NPPF requirement to ensure plans are deliverable. The closest Craven has come to reaching the 350 dpa in the last 9 years was 278 dwellings in 2008/09.
- 7.17 In relation to the viability element of deliverability, there is no evidence to suggest that options A, B and C would create market conditions to question the viability of this scale of development. In contrast option D could saturate the market with land opportunities for new housing and create uncertainty over the viability and deliverability of sites.
- 7.18 The land availability element of 'deliverability' and the Council's Strategic Housing Land Availability Assessment (SHLAA) shows that Housing Growth Options A, B, C and D can be delivered, but with the environmental impacts set out above.

Other considerations: Council strategy, policy and evidence base.

- 7.19 The strategic and policy context and evidence base for housing and employment has been summarised earlier in this paper. With the emphasis of this context on meeting local needs and with no proposals to create a step change in the economic profile of the District, there is no support for a plan housing requirement significantly above the FOAN of 182 dwellings per annum.
- 7.20 However, in order to fulfil the Council's strategic aspirations to maximise affordable housing, minimise the impacts of an unbalance in its ageing population, create balanced and inclusive communities, as well as maximise the workforce potential to support existing local businesses, there is justification to promote a moderately higher level of housing growth above the 182 dwellings per annum.
- 7.21 Housing Growth Option D would best meet the Council's aspirations for affordable housing, but such an increase in labour force and population runs a very high risk of not being matched by local jobs and being in conflict with the Council's economic strategy. This would also be in conflict with the Draft Local Plan Vision which seeks to enable residents to work locally. The likely resultant out of District commuting to work would also be in conflict with Local Plan Objective 1 which seeks to promote sustainable travel movements.
- 7.22 Housing Growth Options B and C would be in general alignment with the recommendations of the Craven Local Plan Employment Land Review (March 2017) (ELR) with regard to future employment land requirements within the plan period. Housing Growth Option A would result in a lower than recommended employment land requirement in the ELR.

Other considerations: Housing in the Yorkshire Dales National Park

- 7.23 The YDNPA now have an adopted Local Plan which seeks to deliver 55 new dwellings per annum across the National Park. The examination Inspector's view was that the FOAN for the Park is between 32 and 38 dwellings per annum. On the face of these statistics it can be suggested that the YDNPA should easily be able to meet its own FOAN. This perhaps points to Housing Growth Option B (the Craven Local Plan Area FOAN of 182 dpa – outside the National Park) as being the growth option best aligned with the YDNP Local Plan.
- 7.24 However, the examination Inspector was concerned that the National Park's Local Plan housing supply up to 2030 was somewhat dependent on windfall housing. As a result his report recommends a modification on housing land supply to the Plan in order to make it sound. A review of the Park's Local Plan Policy on housing allocations within 5 years has also been recommended. Notwithstanding this position and in the knowledge of the challenges faced by the YDNPA on identifying land for housing due to its significant environmental constraints, there still remains some uncertainty over the ability of the YDNPA to meet the housing needs of that part of Craven District's Housing Market Area within the National Park. Furthermore, the geography of housing need does not align with the boundary between the two authorities with some residents of the National Park likely to find housing and jobs in the Craven Local Plan Area.
- 7.25 The above circumstances suggest that Housing Option C, providing agreement is reached with the Yorkshire Dales National Park Authority, may be a more appropriate housing requirement to maximise the chances of meeting the FOAN for the District as a whole in the most sustainable locations and with least environmental impact.
- 7.26 Housing Growth Option D could create a strong housing market immediately adjacent to the YDNP which would be highly likely to undermine the YDNPA's Local Plan objective to make the Park a more attractive option for young adults and people of working age to live in.

Conclusions

- 7.27 Taking into account all the above analysis, a summary of the Council's reasons for its decision making on the preferred housing requirement for the Craven Local Plan is given below:

Housing growth option A: 145 dwellings per annum (2,900 dwellings) from 2012 to 2032

- **is rejected** because, whilst indicating a relatively good scoring on environmental impact in the Sustainability Appraisal (SA) and a good alignment with the latest jobs growth forecast for the District (Experian REM 2016), it fails to meet the full objectively assessed need for housing (FOAN) and would not represent the positive planning for growth required by the NPPF. This option would not meet the full objectively assessed need for affordable housing (FOANAH).

Housing growth option B: 182 dwellings per annum (3,640 dwellings) from 2012 to 2032

- **is rejected.** It scores reasonably well in its environmental impact (SA), and would be able to be met without the need to encroach into higher flood risk land or risk adverse impacts on the District's heritage. It would meet the full objectively assessed need for housing (FOAN) in the Craven Local Plan Area. However this option fails to recognise that some of the YDNP's housing need is likely to be met within the Craven Local Plan Area (outside of the National Park) and runs some risk that the housing need for the District as a whole

may not be met. (It would be reliant on all the remaining housing need of the District being accommodated in the YDNP- this is a risk because of the current supply of housing in the YDNP Local Plan includes some reliance on windfall housing and the YDNPA is committed to reviewing its housing land allocations to identify more land for housing in the latter part of the plan period. This will be a challenge without environmental harm). This option would not meet the full objectively assessed need for affordable housing (FOANAH).

Housing growth option C: 214 dwellings per annum (4,280 dwellings) from 2012 to 2032

- **is accepted as the preferred housing requirement for the Craven Local Plan.** It would contribute better towards meeting the need for affordable housing than Growth Option's A and B. It aligns better than Growth Option B with the Council's Housing and Economic Strategies. This level of growth should ensure that the FOAN for the Housing Market Area (HMA) of the District as a whole will be met in the most sustainable locations across the District and minimise environmental harm in the Yorkshire Dales National Park. The moderate environmental harm likely to arise from providing for this level of housing is considered to be outweighed by the above benefits. This option is considered the best realistic option for minimising the impacts of an ageing population, the creation of balanced and inclusive communities, maximising the workforce potential to support existing local businesses and for maximising affordable housing. Any higher growth than 214 dwellings per annum runs the following risks:
 - undermining the stability of the YDNP's population by encouraging more people to move into Craven District, in particular young adults and people of working age,
 - adversely impacting on sensitive environmental designations, and
 - unnecessarily increasing the lengths of travel to work through the lack of jobs within Craven District for the resident population.

Housing growth option D: 350 to 400 dwellings per annum (7,000 to 8,000 dwellings) from 2012 to 2032

- **is rejected.** Although it is the only option that could potentially meet the full objectively assessed need for affordable housing (FOANAH), it could not be met without significant risks to the environment and an unsustainable pattern of growth. It would result in the unnecessary loss of significant areas of land of medium to high risk of flooding. This option appears unrealistic and undeliverable when compared with historic completions rates in the District which have reflected market demand. It runs the risk of saturating the market and undermining viability and delivery of that level of housing. It would be in conflict with the Council's Economic Strategy and Local Plan Objectives and be out of alignment with the Local Plan evidence contained in the Craven Local Plan Employment Land Review (Feb 2017). It is likely to undermine a key objective of the Yorkshire Dales National Park Authority's Local Plan to make the Park more attractive for young adults and people of working age; and it is likely to result in high levels of out of District commuting by residents seeking work not available in the District.

7.28 Notwithstanding the above conclusions which means that the Council would not meet all its needs for affordable housing (FOANAH) identified in the SHMA it is important to emphasise that the Council is working hard to maximise the opportunities for affordable housing provision through other means than through planning obligations. Its housing strategies and action plans seek to facilitate these other measures. For example, Priority 4 of the Council's Housing Action Plan 2015/16 seeks to return empty properties into use and promote opportunities to registered providers to acquire/lease and refurbish/renovate empty

properties. Furthermore, the York, North Yorkshire and East Riding Housing Action Plan 2015/16 seeks to maximise delivery of affordable housing via planning obligations and other means. This Action Plan proposes to achieve this objective through the establishment of a York, North Yorkshire and East Riding Local Enterprise Partnership wide Registered Provider (RP) forum and identify and engage with RPs not active in the area to promote potential opportunities. This Action Plan also seeks to identify and use opportunities to re-develop or re-use existing residential or commercial property for new housing. Finally, the York, North Yorkshire and East Riding Housing Strategy 2015- 2021 provides the overall strategic basis for these action plans and at this strategic level seeks to continue to make the best use of existing stock and increase the supply of good quality new homes across all tenures and locations in line with Local Plans.

- 7.29 On 14 June 2017, the Council's Spatial Planning Sub Committee, agreed to seek to agree with the Yorkshire Dales National Park Authority a 'Memorandum of Understanding' which sets out the respective positions of each local planning authority in relation to cross boundary matters.

ANNEX 1: Sustainability Appraisal of Housing Growth Options

Key: (++) = Double Positive [colour: dark green], (+) = Positive [colour: light green], 0 = Neutral [colour: grey], (-) Negative [colour: pink], (--) Double Negative [colour: maroon].

Policy: SP1 Meeting Housing Need

The Craven Local Plan Strategic Housing Market Assessment (Dec. 2016) provides the Council with a robust estimate of the objectively assessed needs for housing (OAN) in Craven District from 2012 to 2032. This represents the evidence required to complete the first stage of the Local Plan's remit to set a housing requirement for the plan period. The second stage of the process is to consider what policy and other considerations there are which might point to a higher or lower number of new homes than the OAN. This Housing Growth Options Background Paper (March 2017) provides the second stage of this process for the Craven Local Plan and it has concluded that four housing growth options should be the subject of a sustainability appraisal.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO1) Maximise employment opportunities within Craven	(-)	(--)	(--)	(--)	0	(-)	(-)	(-)	(-)	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(++)	(++)	0	Options C and D may ensure that the economy of Craven remains buoyant and does not decline through a significantly ageing population and a declining workforce. The approach is aimed at creating new jobs and safeguarding existing employers through retaining a pool of available labour. The policy may have little impact on wage levels. Options A and B may not provide the necessary workforce levels to keep the local economy at a vibrant level, particularly Option A with its lowest housing projection.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO2) Maximise opportunities for economic and business growth.	(-)	(--)	(--)	(--)	0	(-)	(-)	(-)	(-)	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(++)	(++)	0	Similarly to SO1, Options C and D may ensure that the economy of Craven remains buoyant and does not decline through a significantly ageing population and a declining workforce. The approach is aimed at maximising opportunities for economic and business growth through retaining a pool of available labour. The policy may have little impact on wage levels. Options A and B may not provide the necessary workforce levels to keep the local economy at a vibrant level.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO3) Promote equality and diversity, and foster community cohesion by reducing all forms of poverty.	(+)	(-)	0	(-)	0	(+)	(+)	(+)	(++)	0	(+)	(++)	(+)	(++)	0	(-)	(--)	(-)	(--)	0	Options B and C may work best to ensure a balanced population is retained to stem the influence of the ageing of the population and maintain economic activity. By providing a greater level of housing, these options may enable an increased choice that would meet a wide range of age and demographic groups including sufficient amounts to achieve affordable needs within the district over the plan period. Option A would most likely result in a significantly ageing population which could have negative effects for inequalities through increased pressure on health services, declining school rolls etc. Option D would meet the district's affordable need and increase business growth, helping to address inequalities. However, conversely it would be likely to harm the natural environment which would impact on inequalities of residents and may place significant pressure on public services.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO4) Enhance access for all to essential facilities.	0	(-)	(-)	(-)	0	0	0	0	0	0	0	0	0	0	0	0	(-)	(-)	(-)	0	Whilst the location of individual schemes concerns physical access to essential facilities, it is important that a sufficient level of housing is provided which enables services to remain viable. It is difficult to ascertain the level at which this would be achieved and depends on the individual service requirements. The spatial strategy in combination with the housing requirement are important in addressing this objective. Therefore the impact of Options B & C are negligible in the absence of detailed individual service requirements. The most extreme projections of Options A & D are likely to have some negative impacts on service provision.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO5) Promote physical, mental and social health and wellbeing.	0	(-)	(-)	(-)	0	0	(+)	(+)	(+)	0	0	(+)	(+)	(+)	0	0	(-)	(-)	(-)	0	Whilst Option D may contribute strongly to providing for higher employment levels, such a high level of development could place significant pressure on services including health, result in a loss of countryside and would likely result in high increases in emissions with the district. Option A may result in a decline in service provision. Options B & C may have the least overall negative impacts as they are thought to provide a better balance in terms of housing provision.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO6) Enable all residents to live in suitable and affordable housing.	0	(-)	(-)	(-)	(-)	0	(-)	0	0	0	0	(+)	(+)	(+)	0	(++)	(++)	(++)	(++)	0	Option D may ensure that the district can meet all its need for affordable housing in terms of numbers. Options A, B and C are likely not to meet the full need in terms of affordable housing, but the local authority would likely seek a percentage of 40% in terms of affordable housing on each eligible site. With increasing housing numbers, Option C performs slightly better than Option B, which in turn performs slightly better than Option A.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO7) Enable everyone to access a good standard of education and the ability to undertake relevant training and augment skill levels.	0	0	(++)	(--)	0	0	0	(+)	(-)	0	0	0	(+)	(-)	0	0	0	(--)	(+)	0	All of the approaches may require increased education depending on the location of new housing. Whilst it would be expected that a greater level of education places would be required under Option C and particularly Option D, policies within the plan concerning new development being required to supported by suitable infrastructure including education should address increased need. It is hence difficult to determine which housing options have positive or negative impacts, but it would most likely be based on differing urban and rural provision impacts as the housing projections arise.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO8) Improve connectivity, reduce the need for travel, and ensure proposed developments have safe access.	0	0	(+)	(--)	0	0	0	0	(-)	0	0	0	(-)	(+)	0	0	0	(--)	(+)	0	The outcomes of this largely depend upon the location of new housing. However, it is generally agreed that the greater level of housing provision, the greater the population increase within Craven and therefore the greater the need for overall travel. However, the outcomes will largely depend on allocations and spatial strategy. Some indications can be made, e.g. Option A would likely result in poorer connectivity for those people living in rural areas, and Option D would put great pressure on existing public transport provision.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO9) Reduce the risk and impacts of flooding on people, property and the environment including through the implementation of Sustainable Urban Drainage.	0	0	0	0	0	0	(-)	0	0	0	0	(-)	(-)	0	0	(-)	(-)	(-)	(-)	(-)	In general, the higher the level of development, the greater potential there exists for flood risk in the District as greenfield land is replaced by built surfaces. Clearly, Option D would most likely result in the greatest flooding risk throughout the district. Option A would always result in the least impact in terms of flood risk. However, the overall impact is not a direct correlation, as the impact of flood risk will also depend on the location of the development throughout the district and particularly within individual settlements.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO10) Protect and enhance the natural and agricultural conditions to maintain soil quality and grow food within Craven. .	0	0	0	(+)	0	0	(-)	0	(-)	0	0	(-)	0	(-)	0	(-)	(-)	0	(-)	0	Options A, B and C will always perform best here, as these options present the least potential to negatively impact on the amount of land taken from agricultural use or potential agricultural use in the future. In contrast, Option D has certainly the greatest negative impact due to increasing housing development taking away from the amount of agricultural land available for food growth within the District. This may be somewhat mitigated against by choosing the agricultural land of poorest quality in the District first for greenfield development, if possible.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO11) Ensure the prudent use of land resources.	(+)	(++)	(++)	(++)	0	(+)	(+)	(++)	(+)	0	(+)	(+)	(+)	(+)	0	(-)	(--)	(--)	(-)	0	Housing Growth Options A and B offer the likelihood of the highest percentage of new development taking place on brownfield and/or land within existing town and village centre boundaries within the district. In contrast, Option D will demand a large percentage of greenfield land to contribute to its large housing development projections. This would be seen as an inefficient and non-prudent use of land resources.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO12) Conserve and where appropriate enhance the historic environment including heritage assets and their settings and areas of identified and potential archaeological interest.	0	0	0	0	0	0	0	(-)	0	0	0	0	(-)	0	0	(-)	(-)	(--)	0	0	Housing Growth Options A and B will generally perform best here, as these options minimise the likelihood of negative impacts on the historic environment settings and areas of identified archaeological interest, with their relatively low projected housing growth rates. However, there is an argument that there is more scope to enhance any heritage assets in poor condition through increased development. Hence the correlation between increased housing growth and an increasing negative impact on the historic environment is not always clear. Similarly, it can be argued that more housing development can mean uncovering more items of potential archaeological interest during ground excavations.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary	
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact				
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact		
SO13) Protect, and where possible enhance, Craven's biodiversity and geodiversity, particularly protected habitats and species.	0	(-)	0	(-)	0	0	(-)	0	(-)	(-)	0	(-)	0	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Residential development has generally had a negative impact on biodiversity and habitats worldwide, primarily by the replacement of natural habitats by the built environment. In more recent times, there have been efforts to enhance biodiversity habitat within designs for larger sites for residential development. However, there is no doubt that more residential development, and associated human population impact, have on the whole negative impacts for the natural environment. Accordingly, overall the larger the housing projection, the greater the negative impact in this case.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO14) Protect and enhance the open countryside and wider landscape character.	0	0	0	(+)	0	0	(-)	0	(-)	0	0	(-)	0	(-)	(-)	(-)	(-)	0	(-)	(-)	The larger the housing allocation, the more severe is the land take in rural areas, and the greater the threat to the open countryside and wider landscape character of the District. This is particularly important given the considerable environmental and socio-economic importance attached to the scenic landscapes in and around the Craven District. In Option A, there is more scope for the urban areas to take most of the housing growth. Option D would present large difficulties in terms of protection of the open countryside due to the relatively extensive land take involved.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO15) Promote innovative design which enhances the visual character of Craven's towns and villages.	(+)	(+)	(+)	(+)	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(+)	(+)	0	Each of the four options is expected to perform adequately here, given that all planning permissions for new development go through the development management process, where good and innovative design is encouraged to safeguard and enhance the visual character of the District's built environment.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO16) Minimise air, noise and light pollution, and where possible improve local air quality.	0	0	(-)	0	0	0	(-)	(-)	0	0	0	(-)	(-)	0	0	(-)	(-)	(-)	(-)	(-)	Options A and B will always perform best here, as these options minimise the likelihood of air, noise and light pollution with the lowest projected housing growth rate. Option D is likely to have severe negative impacts over time, and in particularly in urban areas in terms of air, noise and light pollution. The impact of noise and light pollution is also influenced by housing design and location in new development.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO17) Minimise impacts on climate change, including supporting energy production through renewable and low carbon sources.	0	0	(-)	(-)	0	0	(-)	(-)	(-)	0	0	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	The support of energy production through renewable and low carbon sources is dependent in part on the form and layout of new residential development, in particular the levels of housing density. Clusters of high density housing can support local forms of renewable energy production. However, the density of development is beyond the scope of this policy as it focuses exclusively on the levels of housing growth only. In this regard, it can be stated that for the other aspect of this objective, the minimisation of the impact on climate change, it is the Option A which performs the best, followed by Options B & C. The lower the housing growth rate, the lower is the District's contribution to greenhouse gas emissions. In contrast, Option D has the potential to cause both negative local and transboundary impacts.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 - 400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO18) Conserve and enhance water quality and resources and improve the efficiency of water use.	0	0	0	(+)	0	0	(-)	0	0	(-)	0	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	The greater the housing development in the District, the greater potential for problems regarding both water abstraction rates and the safe disposal of wastewater arising from new development. Therefore Options A and B perform the best of the four options, followed by Option C. Option D has the potential to cause increasing problems over the lifetime of the plan, in terms of both the conservation and enhancement of water quality and resources. In addition, the greater the water abstraction rates, the more likely a negative impact can occur on the protected conservation features of the European designated sites in the region (Special Areas of Protection and Special Conservation Areas). This objective is largely dependent on the density of housing development permitted.

Policy: SP1 Meeting Housing Need

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350 -400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO19) Minimise waste production and increase recycling rates in Craven.	(+)	0	0	0	0	(+)	(-)	0	0	0	(+)	(-)	(-)	0	0	(-)	(-)	(-)	(-)	(-)	As a general rule, the larger the housing allocation, the greater the waste generated within the District. This can be somewhat tempered if recycling rates rise proportionally with waste generation, or preferably faster. However, within the waste hierarchy, prevention of waste is much preferred to the requirement to recycle. Hence, Options A and B, with the two lowest housing growth allocation per annum, perform best here, followed by Option C. Option D performs by far the worst under this objective.

SA Objective	Housing Growth Option A 145 dpa					Housing Growth Option B 182 dpa					Housing Growth Option C 214 dpa					Housing Growth Option D 350-400 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO20) Safeguard minerals resources and other natural material assets, and ensure the safe management of hazard risks of former mining activity, where new development is proposed.	(+)	0	0	(-)	0	(+)	0	0	(-)	0	(+)	(-)	(-)	0	0	(-)	(-)	(-)	(-)	(-)	It stands to reason that the more housing development which takes place, the greater the land take in the District, and the more difficult it becomes to meet this objective. Therefore Housing Growth Options A and B perform the best, followed by Option C. In contrast, Option D has the potential to cause increasing problems over the lifetime of the plan, in terms of safeguarding minerals resources and other natural material assets.

Craven District Council

1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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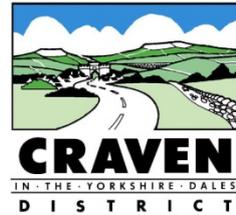
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Part II: Housing Growth Option Paper Addendum

November 2017

Craven Local Plan; Housing Growth Option Paper: Addendum November 2017



1.0 Introduction

- 1.1 A Housing Growth Options Paper (HGOP) was published in June 2017 alongside the Craven Local Plan Pre-Publication Draft Plan to explain how the Council had determined the proposed housing requirement in the Draft Plan. This is an addendum to that paper and the two documents should be read together.
- 1.2 This addendum (HGOPA) has been produced to respond to some of the concerns raised about the June 2017 HGOP during the Draft Plan consultation and to reflect the most recent evidence on demographic and jobs growth forecasting and housing need.
- 1.3 The following three updates have therefore been taken into account in preparing this paper:
 - Craven Local Plan Demographic Forecasting Update (DFU) Addendum: November 2017
 - Craven Local Plan Strategic Housing Market Assessment (SHMA): November 2017.
 - Craven Local Plan Employment Land Review (ELR) Addendum: November 2017
- 1.4 This addendum generates and assesses additional growth options to those contained in the HGOP and then, taking into account all growth options considered in the two reports, selects the proposed housing requirement for the Publication Draft Plan and gives reasons why the other options have been rejected. This housing requirement is reflected in the Craven Local Plan Publication Draft: Policy SP1.
- 1.5 This addendum paper was approved by the Council's Spatial Planning Sub Committee on 27 November 2017.

2.0 Context: Representations made to the Pre-Publication Draft Plan.

- 2.1 The Pre-Publication Draft Plan was the subject of a six week consultation during June and July 2017. During this time a number of objections were received regarding:
 - a) the content and conclusions of the Housing Growth Options Paper
 - b) the contents and conclusions of the evidence base
- 2.2 These objections are set out in the Council's Policy Response Paper for Policy SP1, Meeting the Need for Housing, published alongside the Publication Draft Plan. The detail of these representations is not repeated here.
- 2.3 **Objections to the Housing Growth Options Paper:** The main issue arising from the objections to the HGOP related to whether the Council had considered all reasonable alternatives to the selected growth option. It was considered by a number of objectors that the plan should consider at least one more growth option between Option C (214 dwellings per annum) and Option D (350 to 400 dwellings per annum (dpa)). The argument made was that there was too large a difference between these two options and that there might be a reasonable alternative which could be appropriate to select somewhere between the two options. Objections refer to past proposed housing requirements in the Craven Local Plan Drafts and the Regional Spatial Strategy for Craven being significantly higher than Option C, yet also considerably lower than

Option D. The figures suggested and main reasons for putting them forward as alternative growth options are:

- **256 dpa** (proposed in the 2016 Draft Plan and assessed by the Council as being sustainable at the time)
- **280 dpa** (better support for economic growth and assist in providing for more affordable housing)
- **290 dpa** (SHMA 2016 objectively assessed housing requirement for Craven District)
- **250 to 300 dpa** (would align better with previous plan's housing requirements and the level of growth achieved in 2008/09 (278 dpa))

- 2.4 The Council, in its Housing Strategy and Action Plan, seeks to maximise the provision of affordable housing through the planning system and the National Planning Policy Framework (NPPF) advises local planning authorities to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. As before the 2017 SHMA identifies the relevant housing market area (HMA) as Craven District.
- 2.5 As regards meeting the HMA's full objectively assessed need for housing (FOAN) the 2016 SHMA confirmed that the Option C (214 dpa) housing requirement would achieve this objective. A separate and different method of calculating the full need for affordable housing in the HMA is recommended in the Planning Practice Guidance (PPG) and has been adopted in the Council's SHMA. At the time of publishing the HGOP, again on the basis of the 2016 SHMA, estimated a need for affordable housing in the HMA of 145 dpa. The Council accepted at the time, taking into account a 40% affordable housing contribution on most eligible sites coming forward during the plan period, Option C would fall short of meeting this affordable housing need.
- 2.6 Hence, in view of the importance of seeking to maximise the delivery of affordable housing and subject to the results of the 2017 SHMA, there is justification for considering growth options which are closer to meeting the full objectively assessed need for affordable housing (FOANAH).
- 2.7 **Objections to the evidence base:** Some objections considered the Council's Strategic Housing Market Assessment (SHMA) and the Employment Land Review (ELR) were out of alignment. The ELR used a Regional Econometric Model (REM) published in October 2016, whereas the SHMA and Demographic Forecasting Update had used an REM published earlier in the year. Other objections felt that the SHMA should provide a higher FOAN to reflect the government's policy to address the issue of providing more housing opportunities for newly forming households in the young adult population. Objections were received about when, in the FOAN calculation process, market signals for affordability etc. should be added. Objectors views on this matter would result in a higher than Option C FOAN. Some objections considered that a higher housing growth would better support the plan area's economic prospects. Details of the Council's responses to these objections are given in the Council's Policy Response Paper to Policy SP1.
- 2.8 A combination of the above objections and the publication of more recent evidence on demographics and jobs growth in 2017 have resulted in the Council updating its evidence on these matters and fully aligning the evidence base used. The results of this updating, as far as relevant to the generation of Housing Growth options, are given in Section 3 below.

3.0 Context: Updating/Aligning Evidence Base

- 3.1 Since completion of the Craven Local Plan SHMA 2016, Craven's 2016 mid-year population estimates (MYE) has been published by the Office of National Statistics (ONS), and the Office for Budget Responsibility (OBR) has published its new labour market analysis. Furthermore revised economic forecasts have been produced from the Regional Econometric Model (REM). Hence, to take account of these latest estimates and forecasts, and better align the SHMA and ELR, Edge Analytics has, on behalf of the Council, undertaken a further update which refreshes the underpinning demographic and economic statistics using the latest available evidence. In doing so, a revised suite of growth forecasts have been derived for the district and for the four sub-district areas. Consideration has also been given to the potential impact of higher rates of household formation amongst the young adult population, and the appropriate stage in the FOAN calculation at which to add the market signals uplift.
- 3.2 Arc4 and Nathaniel Lichfield, who undertook the 2016 SHMA and the March 2017 ELR, have used the information from the Edge Analytics DFU Addendum: November 2017, and the March 2017 REM and updated their respective reports. The key findings from the SHMA Update November 2017, relevant to the generation of the Craven Local Plan Housing Growth Options, are as follows:
- The full objectively assessed need for housing (**FOAN**) in the plan area has increased from 182 (SHMA 2016) to **206 dpa**
 - The full objectively assessed need for housing (**FOAN**) in Craven District as a whole, including part of the YDNP has increased from 214 (SHMA 2016) to **242 dpa**.
 - The annualised need for affordable housing has decreased from 145 to **126 dpa**
 - The **proportion of the District's FOAN estimated to be attributed to the National Park** has remained at 15%.
- 3.3 The reasons for these differences are set out in the SHMA 2017 Update and are not repeated here. These findings represent the most up to date housing need figures for the plan area and the District as a whole, having taken into account the objections to the earlier evidence base and the most recent published data on a number of scenarios for growth.
- 3.4 The housing need situation in Craven District and its relationship to the provisions of the NPPF is complicated by the division of the District (the housing market area HMA)) into two planning authorities. The Yorkshire Dales National Park Authority is the planning authority for a significant part of the Craven District and has recently adopted its Local Plan setting out its own housing requirement for the whole National Park. The Craven Local Plan will be the adopted plan for that area of the District outside the National Park.
- 3.5 **Therefore using the results of the SHMA 2017 Update, it is concluded that 206 dwellings per annum (4120 dwellings between 2012 and 2032) is the full objectively assessed need for housing to use in the Publication Draft of the Craven Local Plan. This figure satisfies the NPPF requirement for a 'Policy off' housing figure and represents Stage 1 of the process of determining the Local Plan's housing requirement.**
- 3.6 It is now appropriate to assess whether the plan should plan to provide this amount of housing or any other amount based on constraints, opportunities and policy objectives (the latter are 'Policy on' alternatives). This is classified as Stage 2 of the above process. This paper divides stage 2 into two parts. Part A in Section 4 of this paper identifies what additional options/'reasonable alternatives' should be assessed to ensure that the most sustainable

course of action is subsequently chosen. Part B in Section 5 of this paper then assesses these alternatives and selects a plan housing requirement.

4.0 Generation of additional growth options (NPPF Stage 2 (Part A)).

4.1 The most up to date evidence on the FOAN for housing now points to the need to assess two additional growth options which reflect the latest FOAN for both the plan area and for the District as the housing market area. As these options are generated by the same reasons as Options B and C in the HGOP, and merely based on the most up to date estimates, they have been referenced as:

- Housing Growth Option B1 (206 dpa/4,120 dwellings between 2012 and 2032)
- Housing Growth Options C1 (242 dpa/4,840 dwellings between 2012 and 2032)

4.2 In addition to these two new options for growth, consideration is now given as to whether additional growth options should be generated to respond to the objections referred to in paragraph 2.3 above.

4.3 There are three main 'drivers' of the objectors' arguments for at least one option at a higher level of growth to Option C (214 dpa) and a lower level of growth to Option D (350 to 400dpa). These 'drivers' are that such options:

1. have been accepted by the Council as sustainable and an appropriate level of growth for the Pre-Publication Draft Plan in 2016 .
2. would provide for more affordable housing which is not being met by 214 dpa.
3. would be better aligned with the potential future economic circumstances of the area.

The validity of these 'drivers' is discussed below:

1) 2016 Pre-Publication Draft Plan: Policy SP1 identified a proposed housing requirement at 256 dwellings per annum.

4.4 This proposed housing requirement was based on the conclusions of the SHMA 2015 which identified that the plan area's FOAN was 256 dpa and the District's FOAN was 290dpa. This does not reflect the most recent evidence provided in the November 2017 SHMA Update. As regards the sustainability appraisal of this option at the time, clearly lower options would not have met the FOAN and were lacking in terms of this social dimension of sustainable development. Furthermore, the plan was proposing an average density figure of 40 dwellings per hectare for housing development and this was reflected in the housing yield of proposed land allocations. Objections were received on the proposed density in the plan suggesting it was too high. The Council then gathered further evidence on the matter and agreed with objectors that the density should be reduced. In reducing the average density of housing allocations to 32 dwellings per hectare, this significantly increases the amount of land required to meet the same amount of housing. This significant increase in land take was not taken into account in the 2016 Pre-Publication Draft Plan and its sustainability appraisal. The Council disagrees that the use of a housing figure of 256 dpa as the proposed housing requirement in 2016 represents a good reason to return to that growth option.

2) The delivery of more affordable housing

- 4.5 The provision of affordable homes is an important objective of the Council and the Local Plan. It is NPPF advice that in their local plans, local planning authorities should meet the full objectively assessed needs for market and affordable housing. The PPG states that the FOAN, using household projections may require an adjustment to reflect market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Affordable housing is highlighted as one of these indicators that may require an uplift in the FOAN to reflect local circumstances. The SHMA 2017, as earlier SHMA's concludes that such an uplift is appropriate in Craven. The significance of the need for affordable housing in the plan area means that plan preparation should consider alternatives to the Local Plan FOAN of 204 dpa that could either meet the full objectively assessed need for affordable housing (FOANAH) or be as close as possible to meeting it. The Council considered that it had undertaken this by assessing Option D (350/400 dwellings) in the HGOP.
- 4.6 Whether it is necessary to assess an additional option to maximise affordable housing is clearly linked to the ability of any growth option to deliver the FOANAH. A figure for the FOANAH is only available for the whole HMA, and not the plan area. The FOANAH for the HMA (Craven District) has fluctuated in the different SHMA's that the Council has adopted for the purposes of plan preparation as follows:
- 2015 SHMA: 114 dpa
 - 2016 SHMA: 145 dpa
 - 2017 SHMA: 126 dpa
- 4.7 These differences occur due to the use each time of the most up to date data on annual lettings and affordable housing delivery. The 2017 SHMA FOANAH of 126 dpa is the most up to date estimate and lies between the higher and lower estimates. Therefore this is used to estimate the likely contribution of each growth option to the need for affordable housing.
- 4.8 Through the Local Plan Viability Assessment : Addendum (Nov 2017), the Council is confident that the vast majority of housing sites can provide for 30% affordable housing. Very few sites will not achieve this level of affordable housing. Therefore, and as an indicative guide regarding the delivery of affordable housing, a figure of 30% delivery is used in this paper.
- 4.9 If the total number of dwellings completed each year in the plan area was 242 dpa (Option C1 above) and 30% of these were affordable, 73 affordable homes would be built out per annum. Of course the YDNP would also be providing for affordable housing within the HMA. The adopted YDNP Local Plan indicates that 27 dpa are likely to be provided within the Craven District and using their plan's policy on new housing sites, and again as an indicative guide, it is estimated that 50% of these homes will be affordable (13/14 dpa). This would aggregate to, and result in the delivery of 86 dpa for affordable housing in the HMA. Clearly this is below the 2017 SHMA need for affordable housing of 126dpa across the HMA. Hence, to seek to maximise the provision of affordable homes, in the plan area and HMA, it is appropriate to consider a higher growth option than Option C1.

3) A housing growth which better supports economic prospects

- 4.10 Jobs led population and household growth forecasts provide the Council with the ability to align new housing growth with the likely prospects for employment growth. The Demographic Forecasting Update: November 2017 provides all the forecasts from the Regional Econometric Model (REM) since 2014. They conclude the following in terms of the average annual dwelling requirement based on the need to support the forecast jobs growth:

- Jobs led REM 2014 – between 238 and 281 dwellings per annum
- Jobs led REM 2016 – between 150 and 190 dwellings per annum
- Jobs led REM 2017 – between 149 and 161 dwellings per annum

4.11 The REM 2014 jobs led forecasts applied different economic assumptions and higher household formation rates compared to the later REM's. Hence they are not directly comparable. Nevertheless, the jobs growth forecast in 2014 is significantly higher than the 2016 and 2017 REM forecasts (ELR: Addendum November 2017). Hence to ensure the plan has considered the highest housing figure that relates to earlier jobs growth forecasts, it may be appropriate to assess an additional housing growth option of 280 dpa.

4.12 An additional source of information having potential for generating a potential alternative housing growth option is the Department of Communities and Local Government's (DCLG's) estimate of Craven District's FOAN using the recently published draft standard methodology.

4) DCLG's estimate of Craven's FOAN.

4.13 The DCLG has published its Housing White Paper detailing a draft methodology for a more standardised approach to FOAN calculation across English local authorities. The DCLG methodology has presented an FOAN estimate for each local authority for a 2016–2026 plan period (at present there are no guidelines published for Council's with an extended Local Plan period or a base date prior to 2016). The published FOAN figure for Craven is 151 *households* per year (2016–2026). In taking account of vacant properties and second homes in the FOAN calculation, the estimated household growth results in an equivalent housing FOAN of 165 *dwellings* per annum (dpa).

4.14 It is proposed by the DCLG to approve a standard approach for calculating all local planning authorities FOAN by 31 March 2018 or as soon as possible after that, following consultation. The main difficulties with considering this figure as a potential housing requirement for the plan area are that it is only a consultation figure and may change. Further the DCLG method would only provide a FOAN figure and Council's would still be required to consider adjustments to this figure to generate a Local Plan's housing requirement. Also the Council wish to submit the Craven Local Plan to the Secretary of State prior to the 31 March 2018. It is therefore too early for the Council to consider this figure as a sufficiently robust account of the FOAN for the District. Waiting till the DCLG approves the standard methodology and the appropriate figure for Craven's FOAN carries the risk of a significant delay in the plan preparation process.

Conclusions

4.15 The above discussion on whether to assess any other growth options in addition to those that reflect the results of the 2017 SHMA suggests that, one more option should be assessed and this is based on the most optimistic of jobs led growth options from the REM in 2014. This results in:

- Option E: 280 dpa (5,600 dwellings) between 2012 and 2032.

4.16 Even this higher growth option is likely to fall short of meeting the FOANAH. This could be a reason to consider an even higher growth option for the plan. However, Section 5 of this paper which assesses the suitability of this paper's growth options indicate that Option E (280 dpa) is highly likely to be an unsustainable and undeliverable option. Hence there is no need to consider any higher alternative growth option to that of Option E.

5.0 Selecting the Preferred Housing Growth Option as the Publication Draft Housing Requirement: NPPF Stage 2 (Part B)

5.1 The June 2017 HGOP determined that Stage 2 of the identification of the plan's housing requirement should include an assessment of 4 growth options. This included the FOAN for the plan area at the time of 182 dpa (Option B), one option below that figure based on past delivery rates (Option A) and two above that figure, one based on the FOAN for the District/HMA (Option C) and the other based on the level of homes likely to be needed to meet or come very close to meeting the identified need for affordable housing (Option D).

5.2 For the reasons given earlier in this addendum, this paper now also assesses 3 additional growth options. They are:

- Option B1: (206dpa/4,120 dwellings between 2012 and 2032)
- Option C1: (242dpa/4,840 dwellings between 2012 and 2032)
- Option E: (280 dpa/5,600 dwellings between 2012 and 2032)

5.3 The assessment of these options is divided into the following headings and has drawn upon the relevant information provided in Section 6 of the June 2017 HGOP. Appendix 1 of this paper sets out a sustainability appraisal and this forms an important part of the Council's assessment to be read alongside the text below:

- Environmental considerations
- Social considerations
- Economic considerations
- A sustainable pattern of growth
- Other considerations: Delivery
- Other considerations: Council strategy, policy and evidence base.
- Other considerations: Housing in the Yorkshire Dales National Park

Environmental considerations

5.4 The Sustainability Appraisal (SA) in Appendix 1 to this paper indicates that, in general terms, the higher the scale of housing growth the greater the anticipated adverse environmental effects. There will be greater loss of agricultural land and land resources, greater likelihood of adverse impacts of heritage, landscape and biodiversity in the higher growth options. Therefore the adverse environmental impact of the options generally increases from Option B1 to C1, with Option E having the highest anticipated adverse impact on the environment.

5.5 The SA assessment of each option against connectivity and reduction in the need to travel provides somewhat inconclusive conclusions, being to a large extent dependent upon the location of new housing. Nevertheless the SA concludes that the higher the level of housing growth and population the greater the need to travel. A high car dependency rate is likely to mean that the greater the need to travel, the higher the environmental cost will be in terms of the emission of 'green house' gases. Option E will generate the highest need to travel.

5.6 The SA gives a significant negative scoring to the impact of flooding on the environment of the District were Option E to be selected. The District has large areas of higher flood risk close to its main settlements and higher housing numbers than 242dpa is likely to require the use of such flood risk areas for new development.

Social considerations

- 5.7 The SA indicates that the higher the housing growth the greater the amount of affordable housing can be delivered across the plan area. The improvement of housing choice in terms of house type, size, tenure, price and location is one of the plan's objectives and significant weight should be given to the provision of affordable homes in the selection of the plan's housing requirement. Clearly then Option B1 would provide for the least affordable homes and Option E would provide for the most. The higher the growth option, the SA states, the more likely pressure is to be put on essential services, the greater is the loss of countryside and the higher are the levels of pollution and congestion. This results in the SA giving more negative scoring on the objective of the promotion of physical, mental and social health and wellbeing to the higher growth options. Of course there would be a counter-balance to this impact with the higher proportion of residents provided with the right type and tenure of housing. The SA gives a significant negative scoring to the impact of flooding on people and property of the District, were Option E to be selected. The District has large areas of higher flood risk close to its main settlements and higher housing numbers than 242dpa may require the use of such flood risk areas for new development.

Economic considerations

- 5.8 The SA indicates that increasing housing numbers will generally have an increasingly positive impact on the economy. Increased jobs will be created in the housing construction industry and increased numbers of residents will result in additional spending in local shops and services. Furthermore, the higher the population the better the chances are of ensuring there is a sufficiently large enough labour force to support local businesses. However, in considering the economic circumstances relevant to the selection of a housing growth option it is necessary to also look at the alignment of housing numbers with jobs growth forecasts. The two most recent jobs growth forecasts in the plan's evidence base (2016 and 2017) indicate a lower number of job creation and housing growth required to support the job creation than the 2014 REM forecast. It is considered that significantly more weight should be given to these forecasts than that of the 2014 forecast. Nevertheless, if the 2014 forecast is realised, Option E would have the best alignment with jobs growth. The uncertainties created by 'Brexit' will have influenced these latest figures, and the jobs growth forecast which suggests 281 dwellings per annum are needed in the District are probably now optimistic. This is because the lower household formation rates of the 2016/2017 forecasts and the lower job creation figures are now considered to be more up to date. However, the recent lower jobs growth forecasts might be pessimistic and may be over reacting to the 'Brexit' uncertainties. If this optimistic to pessimistic range of forecasts is accepted then Options B1 and C1 would provide sufficient population to support a jobs growth between the two 'extremes'. Option B1 being closer to the most recent forecasts than Option C1.
- 5.9 An important part of the issue of providing sufficient labour force for the future is the age profile of the District and plan area. The demographics at present already show a high proportion of the population is over 65. The forecast is that this proportion will increase during the plan period. It is therefore important for the plan to seek to create the conditions in the plan area which will be more attractive to younger people and families. The higher growth options providing for more housing and more affordable housing, and the associated potential improvements to the retail, service and community facilities offer, will better assist in the creation of these conditions than the lower growth options.

A sustainable pattern of growth

- 5.10 In 2016 the Council published as part of this plan's preparation "A Spatial Strategy for Growth Distribution in Craven" which set out alternative spatial strategy options, a preferred spatial strategy option and a sustainability appraisal of the options. Having assessed a number of options, the Council selected *Spatial Strategy Option E: 'A balanced hierarchy of growth'* as an appropriate sustainable spatial strategy for the plan. This strategy seeks to accommodate 50% of the plan area's housing growth in Skipton, with the remainder distributed in accordance with other settlement's significantly lower level service centre roles. Other options assessed included higher and lower % growths for Skipton around the 50%. These were rejected following an assessment of the sustainability appraisal. The plan's chosen spatial strategy has received support in the two draft plan consultations undertaken since the sustainability appraisal was published. One objection to the summer 2017 Draft Plan sought a higher % growth in Skipton. Whilst not proposing to increase the proportion of growth (50%) for Skipton in response to this objection, it is the Council's view that, due to the clear advantage Skipton has in terms of access to jobs, shops, services and community facilities over other settlements in the plan area, and the good prospects the town has to attract additional employment in the future and a younger age group, this proportion of growth should not be reduced. The Council consider that *Spatial Strategy Option E: 'A balanced hierarchy of growth'* remains appropriate to take forward in the plan to be submitted to the Secretary of State.
- 5.11 In the light of the above position, an assessment of whether 50% of each housing growth option can be accommodated in Skipton is an important consideration in the Council's decision making on the plan's housing requirement. In the event that 50% of a growth option's housing figure is unable to be accommodated within Skipton then the plan's spatial strategy will be compromised and more housing would have to be met in settlements with a significantly lower service centre role than planned for in Policy SP4 of the Local Plan.
- 5.12 Appendix 2 to this addendum paper sets out information on all the sites included within the Council's Strategic Housing Land Availability Assessment (SHLAA) in and close to Skipton. This appendix should be read in conjunction with the Council's report on the 'Residential Site Selection Process (incorporating employment sites) June 2017 (RSSP)'. The RSSP explains how SHLAA sites have been assessed and some sites selected for inclusion in a 'Pool' which have the potential for allocation in the Local Plan. Those sites in the 'Pool' are assessed further and the most sustainable sites to meet the planned growth figure for a specific settlement have been selected for allocation in the plan.
- 5.13 A list of SHLAA sites for Skipton is given in Appendix 2 and this distinguishes between those which were not selected for the 'Pool', those that were selected for the 'Pool', and those sites to be included in the Publication Draft Plan Sites. Reasons are given in the appendix on why sites, or parts of sites, did not reach the 'Pool' and why those in the 'Pool' have not been included in the Publication Draft Plan. In view of the importance of maximising the delivery of affordable housing and the importance of Skipton's role in this housing growth, on since the Summer 2017 Pre-Publication Draft Plan, the Council has considered carefully what the maximum housing yield in Skipton can be for the Publication Draft Plan.
- 5.14 Appendix 2 also compares the housing yield assessed by the Council as the maximum appropriate to allocate in Skipton in the Publication Draft and each option's housing yield for Skipton which would be required to meet the plan's spatial strategy. The following table summarises this comparison:

Skipton's maximum housing land allocation yield	50% of Option B1 (Skipton housing land allocation requirement)	50% of Option C1 (Skipton housing land allocation requirement)	50% of Option E (Skipton housing land allocation requirement)
1402	1096	1533	1959

- 5.15 The figure of 1402 dwellings in Column 1 above has been derived from the Council's assessment of land availability, suitability and viability of SHLAA sites in Skipton and the process outlined within the RSSP. This figure is reflected in Table 7 of the Publication Draft Plan which sets out the amount of land appropriate to allocate within the settlements of the plan area. The above table compares this 'Skipton capacity' yield with housing land allocation requirements for Skipton under each option. This comparison shows that the housing requirement for Skipton to meet Option B1 can be met, whilst the housing requirement for Skipton in Options C1 and E cannot be met. This indicates that to reach the optimum growth level to maximise affordable housing across the plan area and be in accordance with the plan's spatial strategy, a growth option of between 206 dpa and 242 dpa should be considered.

Other considerations: Delivery

- 5.16 Past housing completion rates since 2000/01 in the table below have been derived from the Council's Annual Monitoring Reports and the latest information provided by the Council for inclusion in the 2017 SHMA.

Year	Dwelling completions in the plan area	Policy target
2000/01	165	153 (Structure/Local Plan)
2001/02	180	153 (Structure/Local Plan)
2002/03	300	153 (Structure/Local Plan)
2003/04	235	153 (Structure/Local Plan)
2004/05	206	153 (Structure/Local Plan)
2005/06	164	153 (Structure/Local Plan)
2006/07	199	250 (Reg. Spatial Strategy)
2007/08	134	250 (Reg. Spatial Strategy)
2008/09	278	250 (Reg. Spatial Strategy)
2009/10	79	250 (Reg. Spatial Strategy)
2010/11	127	250 (Reg. Spatial Strategy)
2011/12	240	250 ((Reg. Spatial Strategy)
2012/13	118	tbd (Craven Local Plan)
2013/14	35	tbd (Craven Local Plan)
2014/15	128	tbd (Craven Local Plan)
2015/16	188	tbd (Craven Local Plan)
2016/17	230	tbd (Craven Local Plan)
An.av. (2000/01 to 2005/06)	208	tbd = to be determined
An. av. (2006/07 to 2011/12)	209	
A. a. (2012/13 to 2016/17)	140	

- 5.17 The above table indicates that Option B1 is closest of the three options being assessed here to the average annual rate of completions over the past 17 years.

Other considerations: Council strategy, policy and evidence base.

- 5.18 In the June 2017 HGOP the strategic and policy context which should inform the Council's decision on the appropriate housing requirement for the Local Plan is summarised. In terms of economic strategy the key aim for the Council is to meet local business needs and ensure there is a good labour supply to meet these local needs. There are no initiatives to create a step change in the economic profile of the District which might justify any significant increases in housing provision above those figures suggested by the demographic and jobs based evidence base. Option B1 is the plan area FOAN and the option which provides the closest housing growth to support the most recent REM job growth forecasts summarised in paragraph 4.9 above and analysed in the plan's Employment Land Review (March and November 2017). As stated earlier in this report the jobs growth forecasts provided as evidence for the Local Plan could be interpreted as providing a range from optimistic to pessimistic. A housing growth option between the two extremes may be the most appropriate. Both Options B1 and C1 would be located between these two extremes.
- 5.19 However, to fulfil the Council's aspirations to maximise affordable housing; attract more young people and families into the District and thereby assist in rebalancing the age profile of the plan area, as well as maximising the workforce potential to support existing local businesses, Options C1 and E have advantages over Option B1. The Council and partners South Lakeland District Council, and the Yorkshire Dales and Lake District National Park Authorities have recently embarked on a three year initiative called 'Great Place'. With the assistance of Heritage Lottery and Arts Council England funding, this initiative aims to achieve a step change in the perception of this part of the Dales and Lakes, to retain and attract younger people to the area.
- 5.20 Using the method of calculation set out in paragraph 4.9 above for each of the options being considered here results in the following level of affordable housing provision. Option B1, along with the 13/14 affordable homes per annum provided in Craven District within the National Park, would result in 75 affordable homes built out each year. This would provide for 60% of the annual need of 126 affordable homes in the Housing Market Area (HMA). Option C1 plus 13/14 affordable homes in the National Park would result in 86 affordable homes built out each year. This would provide for 68% of the annual need for affordable housing in the HMA. Option E plus 13/14 homes in the National Park would result in 97/98 affordable homes built out each year. This would provide for 77/78% of the annual need in the HMA. The higher the level of affordable homes to be provided the closer the compatibility the plan would have with the Council's Housing Strategy and Action Plan.

Other considerations: Housing in the Yorkshire Dales National Park (YDNP)

- 5.21 The YDNP Local Plan was adopted in December 2016 and provides the planning policy framework for the whole National Park up to 2030, including part of the Craven District. It seeks to deliver 55 new dwellings per annum across the whole National Park. This is significantly more than the National Parks FOAN of between 32 and 38 dwellings per annum, as identified by the Inspector at the Local Plan Examination. In the June 2017 HGOP and in the explanatory text of the Craven Pre-Publication Draft Plan (2017) this Council expressed its concerns over whether that part of the National Park within Craven District would be able to provide for the FOAN that this Council's SHMA had identified for it (32 dwellings per annum at that time). In responding to this Draft Plan, the Yorkshire Dales National Park Authority (YDNPA) commented on this concern by Craven. In this response the YDNPA "suggest the plan should not overstate the risks to housing delivery in the Craven District part of the National Park. There is a gross planned housing supply in this area, currently standing at 164 dwellings, and representing 5 years' worth of housing against the notional OAN of 32 dwellings per

annum. The National Park Authority is committed to reviewing its housing land supply culminating in a further release of housing land within 5 years.”

- 5.22 The YDNPA’s Local Plan states at paragraph 4.3 that “The housing target for the local plan area is set at an annual average of 55 dwellings per annum. This is a net figure and will be measured over the year by comparing new dwellings completed to demolitions and change of use to non dwelling uses. This can be disaggregated into the three main housing market areas of Richmondshire (18), Craven (27) and South Lakeland (10)”
- 5.23 The 2017 SHMA now identifies the FOAN of Craven District within the National Park as 38 dwellings per annum. With the YDNPA’s Local Plan providing for 27 dpa in the Craven District, using Craven’s figures, this suggests a potential shortfall of housing within the National Park part of the Craven HMA of 11 dwellings per annum. Therefore, whilst appreciating the YDNPA’s positive planning for growth, using Craven’s SHMA figures, there still remains some uncertainty over the an appropriate number of dwellings being built out in the National Park part of the HMA.
- 5.24 The above circumstances suggest that Option C1 would provide the most appropriate housing requirement to ensure that the FOAN for the District and HMA is met.
- 5.25 The highest housing growth Option E, whilst ensuring the FOAN is met, would carry with it, a risk of undermining one of the YDNPA’s Local Plan objectives. This objective is to: “Encourage development that will support a growing, diverse and resilient economy, and which will help make the National Park a more attractive option for young adults and people of working age to live in” (Objective 3, Page 7 of the YDNP Local Plan).

Conclusions

- 5.26 Taking into account the relevant evidence base, sustainability appraisal and discussion above and previously set out in the June 2017 HGOP, the Council has selected a housing growth option which will be the housing requirement for inclusion in the Publication Draft Craven Local Plan. The reasons for this selection and the rejection of other options are given below.
- 5.27 Option A, in the June 2017 HGOP remains rejected for the reasons given in the HGOP and particularly because it would not meet the plan areas FOAN. Options B and C in the earlier HGOP represent options based on the 2016 SHMA which is not the most up to date evidence. The Council now gives more weight to the 2017 SHMA and Options B1 and C1 reflect the latest position on the Housing Market Area’s full objectively assessed need for housing (FOAN) in this SHMA. Hence Options B and C in the original HGOP are rejected. Option D in the June 2017 HGOP remains rejected for the reasons given in the HGOP.

Housing growth option B1: 206 dwellings per annum (4,120 dwellings) from 2012 to 2032

- 5.28 **is rejected.** This option has some advantages over other options in terms of its lower environmental impact; 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).
- 5.29 However, it is the Council’s view that this option runs too high a risk that, when combined with the likely delivery of new homes in the Craven District part of the National Park, the FOAN for the housing market area (HMA) as a whole might not be met. Also, whilst this option may contribute in the region of 60% of the housing market area’s affordable housing

need, if a higher growth option is possible then a greater proportion of this need could be met.

Housing growth option C1: 242 dwellings per annum (4,840 dwellings) from 2012 to 2032

- 5.30 **is rejected.** There would be a high level of confidence that this option would meet both Craven Local Plan's FOAN and that of the housing market area (Craven District). It could provide for about 68% of the need for affordable housing.
- 5.31 However, this level of growth runs too high a risk of conflict with the Spatial Strategy of the Local Plan. There is an insufficient number of new homes that can be provided for on allocated sites in Skipton to meet the town's 50% proportion of the plan areas growth. This would result in the need to allocate more land for housing in the plan area's lower order service centre settlements. This would not represent a sustainable pattern of growth in accordance with the Council's Sustainability Appraisal of Spatial Strategy Growth Options (2016). The delivery of this amount of new dwellings (242) averaged out over the whole plan period would be a significant challenge to the Council and housebuilders. The total plan requirement under this option is 4,840 dwellings. 699 dwellings have been completed in the first five years of the plan period. This leaves 4141 dwellings to be built out over the next 15 years of the plan period, averaging out at 276 dpa. This is considered unlikely to be deliverable.

Housing growth option E: 280 dwellings per annum (5,600 dwellings) from 2012 to 2032

- 5.32 **is rejected:** This option, if deliverable, would comfortably meet the FOAN for the Local Plan and the housing market area. It could provide for about 77/78% of the identified need for affordable housing.
- 5.33 However, the option runs the greatest risk of adverse impacts on the environment and of a lack of alignment with job growth. This option will generate the highest need to travel. The level of housing growth in this option would not be able to be accommodated in accordance with the plan's spatial strategy. The lack of plan period land capacity in Skipton would mean that a significant number of additional new homes would have to be accommodated in the plan area's lower order service centres settlements and villages to deliver the level of growth in accordance with the plan's spatial strategy. This would not represent a sustainable pattern of growth in accordance with the Council's Sustainability Appraisal of Spatial Strategy Growth Options (2016). These drawbacks to this growth option outweigh the advantages of meeting the majority of the identified need for affordable housing. In any event, these advantages are unlikely to be realised. It appears most unlikely that the housing market would be sufficiently buoyant in the plan area to build out the 326 dwellings per annum required for the remaining 15 years of the plan period.

Housing growth option F: 230 dwellings per annum (4,600 dwellings between 2012 and 2032)

- 5.34 **is selected:** Having rejected all the above housing growth options, it remains necessary to select an alternative option to be the plan's housing requirement. From the above analysis and conclusions, it appears that the plan's housing requirement should be found between the levels of growth in Options B1 and C1, at a level which would ensure the FOAN for Craven District, including the National Park would be met. One key input for selecting an appropriate figure between these two options is the 'capacity' of Skipton (the primary focus for new housing and employment in the plan area) to accommodate 50% of the plan's housing growth.

- 5.35 The maximum appropriate housing yield for the plan period in Skipton is estimated at 1402 dwellings. If 230 dwellings per annum were built out over the plan period, this would mean that 1399 dwellings would be required to be met in Skipton to meet the plan areas 50% target. Therefore 230 dwellings per annum is viewed as the maximum growth option that could conform with the plan's Spatial Strategy.
- 5.36 This growth option will more than meet the Local Plan's FOAN of 206 dpa. Along with the likely contribution of new homes in Craven District inside the National Park, this option will meet the FOAN of the HMA (Craven District as a whole) of 242 dwellings (230 dpa in the plan area, 27 dpa in the National Park would be 257 dpa). The affordable homes likely to be built in the housing market area as a whole is estimated to be about 82/83 dpa. This is about 66% of the 126 dwellings per annum identified need in the housing market area. This is not necessarily in conflict with the NPPF, because meeting the affordable housing need is appropriate as far as is consistent with the policies set out in the NPPF. The NPPF seeks to manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable; and also advises that plans should be deliverable. Any higher growth options than 230 dpa represent too high a risk of being in conflict with these two objectives/policies in the NPPF. This option will provide for the maximum level of affordable housing which is compliant with the policies of the NPPF.
- 5.37 This option will support the Council's policy aspirations for affordable housing and for attracting more young people and families into the District to assist in rebalancing the age profile of the plan area. It provides for economic growth and should provide for sufficient workforce potential to support the existing and likely future local businesses. In relation to this level of housing's alignment with employment land provision, the SHMA November 2017 Update, recommends a FOAN based upon the scenario of 'PG Long Term' trend data. The ELR indicates that this scenario would result in the need for about 32 hectares of employment land. The Local Plan is proposing to safeguard existing, and allocate new employment land, of about 32 hectares.
- 5.38 A housing growth option of 230 dpa would still be challenging to deliver when compared to the past completion rates of the last 17 years (see paragraph 5.16). However with the Local Plan allocating land for housing to meet 94% of the 4,600 dwelling full plan period housing requirement; no proposed phasing for the development of these sites; and a good proportion of these sites deemed to be available by landowners in the first five years of the plan period, there is reason to be optimistic on delivery. Furthermore, the Council initiative 'Great Place' (see paragraph 5.19) to attract younger people into the District and the recent development partnership agreed with Barnfield Property Investment Ltd to promote and facilitate housing development schemes across the plan area, will make an important contribution to delivering the right number of dwellings in the right places for the right people.
- 5.39 For all the above reasons and due to the drawbacks identified for the other growth options, the delivery of 230 dwellings per annum, along with potentially 69 of these for affordable homes in the plan area represents the most appropriate housing provision target to be identified in the Craven Local Plan: Publication Draft.
- 5.40 The above decision means that the full objectively assessed need for affordable housing (FOANAH) will not be met. However it is important to reference here that the Council is working hard to maximise the opportunities for affordable housing provision through other means in its housing strategies and action plans. For example, Priority 4 of the Council's Housing Action Plan 2015/16 seeks to return empty properties into use and promote opportunities to registered providers to acquire/lease and refurbish/renovate empty

properties. Furthermore, the York, North Yorkshire and East Riding Housing Action Plan 2015/16 seeks to maximise delivery of affordable housing via planning obligations and other means. This Action Plan proposes to achieve this objective through the establishment of a York, North Yorkshire and East Riding Local Enterprise Partnership wide Registered Provider (RP) forum and identify and engage with RPs not active in the area to promote potential opportunities. This Action Plan also seeks to identify and use opportunities to re-develop or re-use existing residential or commercial property for new housing. Finally, the York, North Yorkshire and East Riding Housing Strategy 2015- 2021 provides the overall strategic basis for these action plans and at this strategic level seeks to continue to make the best use of existing stock and increase the supply of good quality new homes across all tenures and locations in line with Local Plans.

Appendix 1: Sustainability Appraisal of Housing Growth Options: November 2017

Key: (++) = Double Positive [colour: dark green], (+) = Positive [colour: light green], 0 = Neutral [colour: grey], (-) Negative [colour: pink], (--) Double Negative [colour: maroon].

Policy: SP1 Meeting Housing Need

The Craven Local Plan Strategic Housing Market Assessment Update (November 2017) provides the Council with a robust estimate of the objectively assessed needs for housing (OAN) in Craven District from 2012 to 2032. This represents the evidence required to complete the first stage of the Local Plan's remit to set a housing requirement for the plan period. The second stage of the process is to consider what policy and other considerations there are which might point to a higher or lower number of new homes than the OAN. This Housing Growth Options Background Paper: Addendum (November 2017) provides the second stage of this process for the Craven Local Plan and it has concluded that four housing growth options should be the subject of a sustainability appraisal.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO1) Maximise employment opportunities within Craven	0	(-)	(-)	0	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(++)	(+)	0	(+)	(+)	(++)	(+)	0	Options F, C1 and E can ensure that the economy of Craven remains buoyant and does not decline through a significantly ageing population and a declining workforce. The approach of both options are aimed at creating new jobs and safeguarding existing employers through retaining a pool of available labour. The policy may have little impact on wage levels. These options may be more effective than Options A and B which may not provide the necessary workforce levels to keep the local economy at a vibrant level, particularly Option A with its lowest housing projection.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO2) Maximise opportunities for economic and business growth.	0	(-)	(-)	0	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(++)	(+)	0	(+)	(+)	(++)	(+)	0	Similarly to SO1, options F, C1 and E may ensure that the economy of Craven remains buoyant and does not decline through a significantly ageing population and a declining workforce. The approach is aimed at maximising opportunities for economic and business growth through retaining a pool of available labour. The policy may have little impact on wage levels. In contrast, previous options A and B may not provide the necessary workforce levels to keep the local economy at a vibrant level.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO3) Promote equality and diversity, and foster community cohesion by reducing all forms of poverty.	(+)	(++)	(+)	(++)	0	(++)	(++)	(+)	(++)	0	(+)	(++)	(+)	(++)	0	(+)	(++)	(++)	(+)	0	By providing a greater level of housing, these options may enable an increased choice that would meet a wide range of age and demographic groups including sufficient amounts to achieve affordable needs within the district over the plan period. Option A would most likely result in a significantly ageing population which could have negative effects for inequalities through increased pressure on health services, declining school rolls etc. Previous option D would meet the district's affordable need and increase business growth, helping to address inequalities. However, conversely it would be likely to harm the natural environment which would impact on inequalities of residents and may place significant pressure on public services. These options F, C1 and E are close to option D in that they will help to meet the district's affordable housing need with increasing housing numbers, but are less likely to cause harm in environmental terms.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO4) Enhance access for all to essential facilities.	0	0	0	0	0	0	0	0	0	0	0	0	(-)	0	0	0	(-)	(-)	0	0	<p>Whilst the location of individual schemes concerns physical access to essential facilities, it is important that a sufficient level of housing is provided which enables services to remain viable. It is difficult to ascertain the level at which this would be achieved and depends on the individual service requirements. The spatial strategy in combination with the housing requirement are important in addressing this objective. Therefore the impact of Options B & C are negligible in the absence of detailed individual service requirements. The most extreme projections of previous options A & D are likely to have some negative impacts on service provision. These options F, C1 & E may have negligible or minor impacts on service provision.</p>

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO5) Promote physical, mental and social health and wellbeing.	0	(+)	(+)	(+)	0	0	(+)	(++)	(+)	0	0	(+)	(+)	0	0	0	(-)	(-)	0	0	<p>Whilst previous option D may contribute strongly to providing for higher employment levels, such a high level of development could place significant pressure on services including health, result in a loss of countryside and would likely result in high increases in emissions with the district. Option A may result in a decline in service provision. Options B & C may have the least overall negative impacts as they are thought to provide a better balance in terms of housing provision. Option C1 may have minor positive aspects in some respects, with the increasing numbers of option E possibly having minor negative impacts. Option F may have the best possible scenario. Overall, impacts here are difficult to fully predict in terms of social change.</p>

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO6) Enable all residents to live in suitable and affordable housing.	0	(-)	0	0	0	0	(+)	(++)	(+)	0	(+)	(+)	(++)	(+)	0	(+)	(++)	(++)	(+)	0	Previous option D may ensure that the district can meet all its need for affordable housing in terms of numbers. Options A, B and C are likely not to meet the full need in terms of affordable housing, but the local authority would likely seek a percentage of 30% in terms of affordable housing on each eligible site. With increasing housing numbers, Option C performs slightly better than Option B, which in turn performs slightly better than Option A. Certainly, options F and C1 are likely to have positive impacts, with the increasing numbers under option E promising more suitable and affordable housing.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO7) Enable everyone to access a good standard of education and the ability to undertake relevant training and augment skill levels.	0	0	(+)	(-)	0	0	0	(+)	(-)	0	0	0	(+)	(-)	0	0	0	(-)	(+)	0	All of the approaches may require increased education depending on the location of new housing. Whilst it would be expected that a greater level of education places would be required under previous option C and particularly Option D, policies within the plan concerning new development being required to supported by suitable infrastructure including education should address increased need. It is hence difficult to determine which housing options have positive or negative impacts, but it would most likely be based on differing urban and rural provision impacts as the housing projections arise. Options B1, F and C1 may have minor positive urban impacts and minor negative rural impacts, and option E may have minor negative urban impacts and minor positive rural impacts.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO8) Improve connectivity, reduce the need for travel, and ensure proposed developments have safe access.	0	0	0	(-)	0	0	0	(-)	(+)	0	0	0	(-)	(+)	0	0	0	(-)	(+)	0	The outcomes of this largely depend upon the location of new housing. However, it is generally agreed that the greater level of housing provision, the greater the population increase within Craven and therefore the greater the need for overall travel. However, the outcomes will largely depend on allocations and spatial strategy. Some indications can be made, e.g. previous option A would likely result in poorer connectivity for those people living in rural areas, and previous option D would put great pressure on existing public transport provision. Options F, C1 and E are likely to have minor negative urban impacts and minor positive rural impacts.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO9) Reduce the risk and impacts of flooding on people, property and the environment including through the implementation of Sustainable Urban Drainage.	0	(-)	0	0	0	0	(-)	(-)	0	0	(-)	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	In general, the higher the level of development, the greater potential there exists for flood risk in the district as greenfield land is replaced by built surfaces. Clearly, previous option D would most likely result in the greatest flooding risk throughout the district. Previous option A would always result in the least impact in terms of flood risk. However, the overall impact is not a direct correlation, as the impact of flood risk will also depend on the location of the development throughout the district and particularly within individual settlements.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO10) Protect and enhance the natural and agricultural conditions to maintain soil quality and grow food within Craven. .	0	(-)	0	(-)	0	0	(-)	0	(-)	0	(-)	(-)	0	(-)	0	(-)	(-)	0	(-)	0	<p>In terms of the previous set of options A, B and C will always perform better than option D, as those options present the least potential to negatively impact on the amount of land taken from agricultural use or potential agricultural use in the future. In contrast, option D has certainly the greatest negative impact due to increasing housing development taking away from the amount of agricultural land available for food growth within the District. This may be somewhat mitigated against by choosing the agricultural land of poorest quality in the District first for greenfield development, if possible. It is similarly the case with these options. Options B1, F, C1 and E are likely to have increasing negative impacts as housing numbers rise.</p>

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO11) Ensure the prudent use of land resources.	(+)	(+)	(++)	(+)	0	(+)	(+)	(+)	(+)	0	0	(+)	(+)	(-)	0	(-)	(-)	(--)	(-)	0	Previous housing growth options A and B offer the likelihood of the highest percentage of new development taking place on brownfield and/or land within existing town and village centre boundaries within the district. In contrast, Previous option D will demand a large percentage of greenfield land to contribute to its large housing development projections. This would be seen as an inefficient and non-prudent use of land resources. Option F may be seen as having a broadly balanced approach to land resource use, in terms of socio-economic needs and environmental safeguarding. Options C1 and E may be progressively negative options in this regard, in terms of suitable land availability and environmental capacity.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO12) Conserve and where appropriate enhance the historic environment including heritage assets and their settings and areas of identified and potential archaeological interest.	0	0	(-)	0	0	0	0	(-)	0	0	0	0	(-)	(-)	0	(-)	(-)	(-)	(-)	0	Previous housing growth options A and B will generally perform best here, as these options minimise the likelihood of negative impacts on the historic environment settings and areas of identified archaeological interest, with their relatively low projected housing growth rates. However, there is an argument that there is more scope to enhance any heritage assets in poor condition through increased development. Hence the correlation between increased housing growth and an increasing negative impact on the historic environment is not always clear. Similarly, it can be argued that more housing development can mean uncovering more items of potential archaeological interest during ground excavations. Options B1 and F are likely to have minor negative impacts. Options C1 and E may have increasingly negative impacts.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO13) Protect, and where possible enhance, Craven's biodiversity and geodiversity, particularly protected habitats and species.	0	(-)	0	(-)	(-)	0	(-)	0	(-)	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Residential development has generally had a negative impact on biodiversity and habitats worldwide, primarily by the replacement of natural habitats by the built environment. In more recent times, there have been efforts to enhance biodiversity habitat within designs for larger sites for residential development. However, there is no doubt that more residential development, and associated human population impact, have on the whole negative impacts for the natural environment. Accordingly, overall the larger the housing projection, the greater the negative impact in this case. This means that these options C1 and E are likely to have relatively negative impacts compared to the other options presented here, B1 and F.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO14) Protect and enhance the open countryside and wider landscape character.	0	(-)	0	(-)	0	0	(-)	0	(-)	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	0	(-)	(-)	<p>The larger the housing allocation, the more severe is the land take in rural areas, and the greater the threat to the open countryside and wider landscape character of the District. This is particularly important given the considerable environmental and socio-economic importance attached to the scenic landscapes in and around the Craven District. In previous option A, there is more scope for the urban areas to take most of the housing growth. Previous option D would present large difficulties in terms of protection of the open countryside due to the relatively extensive land take involved. Options C1 and E are not likely to present as many difficulties as previous option D, but are still likely to have increasingly negative impacts relative to the other options B1 and F.</p>

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO15) Promote innovative design which enhances the visual character of Craven's towns and villages.	(+)	(+)	(+)	(+)	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(+)	(+)	0	(+)	(+)	(+)	(+)	0	Each of these options is expected to perform adequately here, given that all planning permissions for new development go through the development management process, where good and innovative design is encouraged to safeguard and enhance the visual character of the District's built environment.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO16) Minimise air, noise and light pollution, and where possible improve local air quality.	0	(-)	(-)	0	0	0	(-)	(-)	0	0	(-)	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	Previous options A and B will always perform best here, as these options minimise the likelihood of air, noise and light pollution with the lowest projected housing growth rate. Previous option D is likely to have severe negative impacts over time, and in particular in urban areas in terms of air, noise and light pollution. The impact of noise and light pollution is also influenced by housing design and location in new development. Options C1 and E are likely to have negative impacts, particularly considering the high private vehicle use in the district. Options B1 and F are likely to have minor negative impacts.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO17) Minimise impacts on climate change, including supporting energy production through renewable and low carbon sources.	0	(-)	(-)	(-)	0	0	(-)	(-)	(-)	0	0	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	<p>The support of energy production through renewable and low carbon sources is dependent in part on the form and layout of new residential development, in particular the levels of housing density. Clusters of high density housing can support local forms of renewable energy production. However, the density of development is beyond the scope of this policy as it focuses exclusively on the levels of housing growth only. In this regard, it can be stated that for the other aspect of this objective, the minimisation of the impact on climate change, it is the previous option A which performs the best, followed by previous options B and C. The lower the housing growth rate, the lower is the District's contribution to greenhouse gas emissions. In contrast, previous option D has the potential to cause both negative local and transboundary impacts. Options F, C1 and E are likely not to cause the negative impacts to the extent of previous option D but are likely to still cause difficulties.</p>

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO18) Conserve and enhance water quality and resources and improve the efficiency of water use.	0	(-)	0	0	(-)	0	(-)	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	The greater the housing development in the District, the greater potential for problems regarding both water abstraction rates and the safe disposal of wastewater arising from new development. Therefore previous options A and B perform the best of the four options, followed by previous option C. Previous option D has the potential to cause increasing problems over the lifetime of the plan, in terms of both the conservation and enhancement of water quality and resources. In addition, the greater the water abstraction rates, the more likely a negative impact can occur on the protected conservation features of the European designated sites in the region (Special Areas of Protection and Special Conservation Areas). This objective is largely dependent on the density of housing development permitted. Here, option B1 is likely to have minor negative impacts, with options F and C1 likely to have slightly increased negative impacts. Option E are likely to put noticeable pressure on water quality and resources which would need solutions with water providers.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO19) Minimise waste production and increase recycling rates in Craven.	(+)	(-)	0	0	0	(+)	(-)	(-)	0	0	(+)	(-)	(-)	0	0	(-)	(-)	(-)	(-)	(-)	within the District. This can be somewhat tempered if recycling rates rise proportionally with waste generation, or preferably faster. However, within the waste hierarchy, prevention of waste is much preferred to the requirement to recycle. Hence, previous options A and B, with two relatively low housing growth allocations per annum, perform best here, followed by previous option C. Previous option D performs by far the worst under this objective. Here, options C1 and E are not likely to cause the extent of the problems of previous option D but are still likely to result in increasing waste production. Options B1 and F are likely to present minor negative impacts in terms of waste production.

SA Objective	Housing Growth Option B1 206 dpa					Housing Growth Option F 230 dpa					Housing Growth Option C1 242 dpa					Housing Growth Option E 280 dpa					Commentary
	Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			Timescale of Impact		Location of Impact			
	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	Short term	Long term	Urban	Rural	Transboundary Impact	
SO20) Safeguard minerals resources and other natural material assets, and ensure the safe management of hazard risks of former mining activity, where new development is proposed.	(+)	0	0	(-)	0	(+)	(-)	(-)	0	0	(+)	(-)	(-)	(-)	0	(-)	(-)	(-)	(-)	(-)	<p>It stands to reason that the more housing development which takes place, the greater the land take in the District, and the more difficult it becomes to meet this objective. Therefore previous housing growth options A and B perform the best, followed by previous option C. In contrast, previous option D has the potential to cause increasing problems over the lifetime of the plan, in terms of safeguarding minerals resources and other natural material assets. Here, options C1 and E may pose increasing difficulties in terms of safeguarding mineral resources which would require careful consideration with the relevant authority. Options B1 and F are likely to impose negligible or minor negative impacts overall.</p>

**APPENDIX 2: Council’s position on suitability of Strategic Housing Land Availability Assessment (SHLAA) Sites for allocation in Skipton.
(Craven Local Plan Publication Draft.)**

SHLAA Sites identified in the ‘Pool’ for Skipton

Site ID	Site Address	Hectare	Housing Yield (gross)	Preferred site for housing Y/N	Reasons why not identified as a preferred site	Housing yield (net)
SK013	East of Aldersley Avenue and south of Moorview Way	7.777	249	Yes		100
SK015	Cefn Glas and land to south-east, Shortbank Road	1.132	36	Yes (part – 0.442ha)		14
SK018	Land west of Whinny Gill Rd (garages)	0.101	3	No	The site size is small but it performs relatively well regarding flood risk. It is thought possible to potentially accommodate a small number of residential dwellings. Visibility is slightly sub-standard but traffic generation trade off at 3 garages per dwelling. The site does not pass all four District Level Analyses defined and assessed within the residential site selection process, as given the site size it is unlikely to deliver affordable housing. Therefore the site is not considered suitable as one of the Preferred Sites in this settlement.	None
SK044	Former allotments and garages, Broughton Road	0.591	19	Yes		19
SK049	Land to east of A629 and south of Ings Lane	6.051	Employment site	No		None
SK058	Whitakers Factory Site, Keighley Road	0.492	16*	Yes		16
SK060	Business premises and	2.351	123*	Yes		123

	land, west of Firth Street					
SK061	East of canal, west of Sharphaw Avenue	3.663	117	Yes		89
SK080	Land north of Gargrave Road and south of A65 (at roundabout)	1.645	Recommended for Employment	No	Although the site performs to an adequate standard in the Sustainability Analysis, the site is not deemed suitable to enter the Pool of Sites because the ELR recommends that this site should be considered for employment.	None
SK080a	Land north of Gargrave Road and south of A65	15.918	82	Yes		Total net yield of these sites is 324 (revised figure from 318 included in June 17 draft LP)
SK081	Land north of Gargrave Road and west of Parkwood Drive and Stirtonber		153	Yes		
SK082	Land bounded by White Hills Lane and A65		27	Yes		
SK108	Land west of Park Wood Drive and Stirtonber		332	Yes		
SK087	Land to north of A6131 and south of A65, Skipton	2.11	67	Yes		35
SK088	Hawbank Fields, North of Otley Road and South of A6132	8.598	275	Yes		143 (revised figure from 126 included in June 17 draft LP)
SK089	Land at Elsey Croft, south of Otley Road	10.591	262	Yes		218 (revised figure from 270 included in June 17 draft LP as site will incorporate new primary school)
SK090	Land north of Airedale Avenue and east of railway line		77	Yes		

SK094	Land bounded by Carleton Road, railway line and A629	11.286	361	Yes		99
SK099	South of Gargrave Road, north of Craven College	1.12	36	No	The site passes all four District Level Analyses defined and assessed within the residential site selection process. After a comparison with other Pool of Site options in Skipton, the site is not considered suitable as one of the Preferred Sites for residential development in this settlement. The site is of importance within Skipton Conservation Area. It is located at the entrance to a wider area including Aireville Park, a conservation meadow, golf course, swimming pool and fitness centre, Craven Collage, Skipton Academy. It is considered that this site is more suitable for well-designed employment units within a generally open landscaped setting to complement the existing cluster of employment/educational uses in the northwest of Skipton. There is good access to the A road, without the need to pass through residential development. The site falls in flood risk zone 1, however the north east corner of the site lies in an area at medium/high risk of surface water flooding.	None
SK101	East of Keighley Road and south of Cawder Lane	3.999	128	Yes		110
SK113	Land between Skipton Auction Mart and canal	3.84	Employment	No		None
SK114	Cawder Ghyll/Horse Close and garages off Cawder Road	4.571	204	Yes		112 (revised figure from 108 included in June 17 draft LP as extended site will incorporate
SK124	Garages off Cawder Road		3 (site to provide access to SK114)	Yes		

						increased areas of GI to mitigate landscape impact)
SK135	Skipton Rock Quarry, Harrogate Road	4.612	Employment	No		None
SK137	Land to east of Grassington Road	2.541	81	No	The site is proposed as a larger area of Local Green Space located to the north of Skipton (Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & the Bailey, and to the west by Grassington Road, Skipton)	None
SK138	Land to south of Broughton Road	6.557	210	No	<p>The majority of the site is in FZ1 with the north east corner of the site being in FZ3. The site is located on the edge of Skipton to the west of Skipton bypass, which means development of the site would have minor negative impacts, as it would represent residential development beyond the physical boundary of the bypass, to the west of the town. Access is acceptable on to this site if adjoins the bypass to the east.</p> <p>The site passes all four District Level Analyses. After a comparison with other Pool of Site options in Skipton, the site is not considered suitable as one of the Preferred Sites in this settlement. Residential development on this site would represent an extension beyond the physical boundary of Skipton bypass to the west of the town. The built up area of Skipton is enclosed within the boundary of the bypass to the north, west and southwest of Skipton. There are sites closer to Skipton town centre that are preferred to meet the residual housing requirement for the town. It is the Council's view that development beyond the western bypass should not be allowed unless it forms</p>	None

					part of a comprehensive master planned urban extension comprising mixed uses of employment, housing, neighbourhood shopping centre and open space. Subject to land availability this can be assessed in the review of the plan.	
SK139	Land to east and west of Cavendish Street	1.955	Mixed use opp site/regeneration area	No		None
SK140	Skipton Railway Station and land to the east and north; Sandylands Business Centre	5.632	Mixed use opp site/regeneration area	No		None
					Total net yield	1402
<p>The figures below are the number of homes that would require land allocations for Skipton in the four housing growth options assessed in this Housing Growth Options Paper: Addendum, November 2017. The method of calculating these figures is in accordance with Table 5 of the Publication Draft Plan.</p>						
(New Option B1) GROSS residual housing requirement for allocation in the Local Plan for Skipton based on 50% of 206 dwellings per annum over 20 year period						1096
(New Option F) GROSS residual housing requirement for allocation in the Local Plan for Skipton based on 50% of 230 dwelling per annum over 20 year plan period (2300 dwellings)						1399
(new Option C1) GROSS residual housing requirement for allocation in the Local Plan for Skipton based on 50% of 242 dwelling per annum over 20 year plan period (2420 dwellings)						1533
(New Option E) GROSS residual housing requirement for allocation in the Local Plan for Skipton based on 50% of 280 dwelling per annum over 20 year plan period (2800 dwellings)						1959

*Sites SK058 & SK060 have the same gross and net yield as their yield has been calculated given the opportunity that exists on these sites for conversion. No GI is proposed on these two sites.

SHLAA sites in Skipton NOT identified in 'Pool'

SHELAA Ref	Site Address	Site Area (Ha)	Site Yield	Reasons why not selected within 'pool of sites'
SK001	Land to east of Grassington Rd, properties 10-12	0.814		<p>Area at medium risk of flooding is adjacent to the western boundary of the site (along Grassington Road). It is a town centre site within the Conservation Area. Intensification of this site presents difficulties in terms of safe access, with an entrance to the site emerging very close to a busy intersection of Grassington Road and Raikes Road, with another laneway leading to the old Catholic church to the south. There is no footpath adjacent to the site boundary, with a quite dangerous bend on the road. Some motorists do not seem to appreciate the hazardous nature of this junction given the observed speeds at which vehicles are driven in the vicinity.</p> <p>Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site presents an inadequate road access, which is a determining impediment to selection.</p>
SK004	Former nursery east of 1a The Bailey	0.17		<p>There is an area at medium risk of flooding adjacent to the northern boundary of the site (along The Bailey). It is a town centre site within the Conservation Area. Intensification of this site presents difficulties in terms of safe access, but the impact upon the Conservation Area and its features here are deemed to be too great to recommend development. Safe access cannot be achieved; visibility cannot be achieved.</p> <p>Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site presents an inadequate road access and development would have a negative impact on the Conservation Area, which are determining impediments to selection.</p>
SK007	High Trees, The Bailey;	0.539		<p>Planning Permission approved (30/2013/13949) for 9 dwellings on the site. Hence, site not to be taken forward.</p>
SK009	Chinthurst Guest House	0.162		<p>The site is in the Conservation Area. Flood Zone 2 is adjacent to the southern boundary of the site. There are numerous Tree Preservation Orders on site, and the site's small area means that there is an insufficient land area for residential dwellings. Safe access can be achieved. Development of site would have a negative impact on the Conservation Area and existing biodiversity.</p> <p>Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. Residential development of this site would have a negative impact on the Conservation Area and local biodiversity.</p>

SK010	Peter Watson garage site, Otley Road	0.197		Planning Permission approved (63/2014/15082) relating to the business currently on the site, which is deemed to make the rest of the site area unviable for residential development. Hence, site not to be taken forward.
SK014	Land to rear of 33 Lytham Gardens	0.046		Site is below 0.1 hectares in size and is not capable of accommodating at least 5 dwellings. Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis*. The site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK016	Land south of Shortbank Close	0.299		Development of this site would most likely be an inefficient use of land. This site is in flood zone 1, however is prone to medium to high surface water flooding, and it acts as a 'buffer' green space between residential development to the north and south. This site has the potential to form part of a future green corridor from the east of Skipton through to the south-central area of the town. Development here would represent an unnecessary intensification of this area. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site has numerous negatives, which outnumber the positives for the site, including that development of the site would result in the loss of an important existing green corridor from the east to the south central area of Skipton.
SK020	Land at the Toll House, Shortbank Road	0.1		Planning Permissions approved (63/2015/16183) and (63/2015/16184) relating to the residential units currently on the site, which is deemed to make the rest of this very small site area unviable for residential development. Hence, site not to be taken forward.
SK021	South of Shortbank Road, north of Greatwood Avenue	3.03		The site is in the Conservation Area. Majority of the site in FRZ1, but northern area of the site vulnerable to a high risk of surface water flooding. There is a steep slope from north to south on this site which is seen as a significant barrier to development. The site forms part of a potential green corridor from the east of Skipton to the south central part of town, and developing here would remove this possibility. This site together with surrounding land is recommended as a LGS designation. 63/2007/7055 - approval for 8, 2 bed flats, new access & parking areas to the north east corner of this site. This consent has been completed. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. This site provides a visual green corridor through the centre of Skipton. Residential development of this steeply sloping site would fail to protect and enhance this existing green corridor. The site is also

				recommended as a LGS designation in the next consultation draft Local Plan.
SK022	Land to east of mineral railway, off Brougham St	0.869		The site is in the Conservation Area. The site could form part of a potential green corridor from the east of Skipton to the south central part of town, and developing here would remove this possibility. The site is vulnerable to medium risk of surface water flooding. The site is access from Castle Street by an underpass of the railway line. The underpass has restricted length and width. The site does not include a sufficient frontage to enable an access of acceptable standards to be formed onto the public highway. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site presents an inadequate road access, which is a determining impediment to selection.
SK033	Off Gargrave Road, north-east of Aireville Grange	0.592		Planning Permission approved (63/2008/8274) for Use Class B1 Office Development Reserved Matters. Hence, site not to be taken forward.
SK034	Mill and builders yard north of Marton Street	0.27		Planning Permission approved (63/2013/13343) for access improvements to the commercial unit on site. The rest of the site is deemed unviable for residential development of sufficient size. Hence, site not to be taken forward.
SK037	Land to rear of former Granville St Council offices, adj canal	0.739		Planning Permission approved (63/2011/11998), and approval for subsequent related applications, for 57 dwellings in conjunction with SK038. Hence, site not to be taken forward.
SK038	Former Council Offices, Granville Street	0.613		Planning Permission approved (63/2011/11998), and approval for subsequent related applications, for 57 dwellings in conjunction with SK037. Hence, site not to be taken forward.
SK046	West of Ings Lane	1.667		Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site presents an inadequate road access, which is a determining impediment to selection and approximately half the site is located in flood risk zone 3, which is not suitable for residential development. The Council's Employment Land Review 2017 (ELR) recommends that this site should be considered for employment.
SK047	West of Ings Lane / south of railway	0.482		Planning Permission approved (63/2014/15262) for extensions to existing building to improve existing storage facilities for the current business use. Hence, site not to be taken forward (note EA mapping now shows this site area in in either FRZ2 or FRZ3 area).
SK051	West of the junction of Carleton New Road	0.81		Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site has the majority of

	and Carleton Road			its area under Flood Zone Risk 2 and 3, which is a determining impediment to selection. The site's western edge has high risk of surface water flooding. The site is in the Conservation Area, and it is deemed to be of importance in terms of an open green space in the area.
SK052	Croft House, Carleton Road;	0.39		Planning Permission approved for (63/2012/12292) Change of use from commercial offices, formerly NYCC Highways, to single private family residence. This permission has been implemented. Hence, the site not to be taken forward.
SK054	Land west of Carleton Road, west of Eller Beck	1.745		Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site has the majority of its area under Flood Zone Risk 2 and 3, which is a determining impediment to selection. The eastern portion of the site is in the Conservation Area. Site is at low, medium and high risk of surface water flooding. Safe access can be achieved.
SK057	Railway banking to south of Carleton Road	0.545		Site withdrawn from SHLAA
SK083	Land bounded by A65, White Hills Lane and Raikes Road	2.45		Planning Permission approved (63/2013/13748) for residential development. Hence site not to be taken forward.
SK084	Land between A65 and Grassington Road	27.751		Development of this site would have negative impacts on landscape character and biodiversity. The site is in the Conservation Area, and there is a scheduled ancient monument on the site. The site is in a prominent location in the north of Skipton. Development on this very large site would negatively change the setting of Skipton and its visual character. This site together with surrounding land is recommended as a LGS designation. Sections of the east and west of the site are within medium to high risk of surface water flooding. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites.
SK086	East of junction of Skipton Road and Embsay Road	3.26		Planning Permission approved (63/2015/16113) for residential development, including layout and access requirements. Hence site not to be taken forward.
SK095	Auction Mart and access land to north	2		Although the site performs to an adequate standard in the Sustainability Analysis*, the site is not deemed suitable to enter the Pool of Sites because the ELR recommends that this site should be considered for employment.

SK096	Land to west of Aireville Park	3.907		Part of the site is under the designation of the sports pitch, with a golf course on the eastern section. The site is in the Conservation Area. The site is recommended as a LGS designation**. Site is adjacent to an area at medium/high risk of surface water flooding. Southern boundary of the site is adjacent to flood zone 3a. The site has no direct connection/frontage to a highway maintainable at the public expense. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites.
SK097	Land to west of Miniature Golf Course, Aireville Park	0.429		Part of the site is under the designation of the sports pitch, with a golf course on the eastern section. The site is in the Conservation Area and is recommended as a LGS designation, which recognises the contribution the site makes to physical, mental and social health and wellbeing. The site is within flood zone 3a and within a high risk area of surface water flooding and has no direct connection/frontage to a highway maintainable at the public expense. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites.
SK098	Land south of Swimming pool, Aireville Park	0.312		The site is viewed as assisting to extend and improve the sports and recreational facilities in Aireville Park. There is a medium and high risk surface to the west of the site. There is no access to an adopted highway. Residential development of this site would not promote physical, mental and social health and wellbeing. Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites.
SK103	Clay Hall Farm, Broughton Road	0.346		Planning Permission outline approval (63/2016/17312) for erection of 20 dwellings and including site SK136. Approval for the erection of 2 dwellings (63/2016/17352).
SK109	North and west of Ling Fields, east of A629 Skipton Bypass	0.607		Planning Permission approved (65/2015/15388) for warehouse & forecourt/parking. Hence site not to be taken forward.
SK111	Premises and car park at Bowers Wharf, Sackville Street	0.061		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis* as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK116	Land to east of canal and west of High Laithe Farm, Snaygill	3.806		The site itself has no direct connection/frontage to a highway maintainable at the public expense, is accessed via a track from the A6131 Keighley Road and crossed the canal using a narrow bridge. This would need a wider traffic assessment undertaking. Access to this site could be achieved via site SK101, which adjoins the site to the north, however NYCC

				<p>Residential Highway Design Guide recommends that sites yielding over 100 dwellings should preferably have two points of access. As the two sites would yield well over 100 dwellings it is considered that this site is constrained in terms of access. Opportunity for sustainable travel with the existing walkway by the canal. Flood zone 3a is adjacent to the western site boundary, along the canal. Area of medium risk of surface water flooding along the northern boundary of the site.</p> <p>The site passes all four District Level Analyses, defined and assessed within the residential site selection process. After a comparison with other Pool of Site options in Skipton, the site is not considered suitable as one of the Preferred Sites in this settlement.</p>
SK118	J N Bentley Ltd, Snaygill Industrial Estate, west of Keighley Road	0.792		<p>An employment use can be considered suitable in this existing industrial area. Acceptable access exists. ELR 2017 recommends this site is retained as employment use.</p>
SK119	Land south of Whinny Gill Reservoir	6.571		<p>Comments from NYCC Highways state that the site is landlocked, however information from the site owner states that suitable access to the site could be achieved via approved scheme 63/2015/15503 on the adjoining land to the west, which is within the same ownership as site SK119. The layout for this approved scheme shows an access spur, which would provide direct access into the adjoining site SK119. This scheme has not yet been implemented; therefore the site has been assessed on this basis. If existing access constraints can be overcome in the future it is recommended that the site is divided into two parts based on the stream running through the depression of land in the central part, which is partly surrounded by trees. This central area of the site has also the highest risk of surface water flooding on the site. The majority of the site is in FRZ1. There is an area of medium risk of surface water flooding in the western section of the site. Development is likely to have a low impact on biodiversity value.</p> <p>Site does not perform to an adequate standard in the Sustainability Analysis*, and the site is not deemed sustainable in order to enter the Pool of Sites. The site is a greenfield site which is currently not connected to the existing built form of Skipton and does not currently have a suitable access. It is an elevated site to the east of Skipton, which is characterised by open moorland. This site is remote from existing services within the town and therefore would not achieve the objectives of providing access for all to essential facilities, would not help to minimise air, noise and light pollution and impacts on</p>

				climate change. Allocation of this site for residential use would have a significant negative effect in terms of protecting and enhancing the open countryside and the wider landscape. These are all factors in determining impediment to selection.
SK120	Former ATS Site, Carleton Road	1.012		Planning Permission approved (63/2016/17515) outline for residential development with all matters reserved.
SK121	Land at Unit 1, Mill Lane	0.03		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has less than 0.1 hectares in Flood Risk Zone 1.
SK122	Former Council offices, Granville Street;	0.613		Planning Permission approved (65/2014/15027) for warehouse & forecourt/parking. Hence site not to be taken forward.
SK125	Land adjacent to 50 North Parade	0.125		Planning Permission approved (63/2016/17338) for residential development. Hence site not to be taken forward.
SK126	Land Adjacent to 112 Princes Drive	0.037		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK127	Land Adjacent to Marina Crescent	0.09		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK128	22-24 Shortbank Road;	0.065		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK129	Land to east of Water Street	0.05		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK130	Craven buildings, Church Street/ Craven Street	0.147		Planning Permission approved (63/2008/8257 and subsequent related applications 63/2009/10200 & 63/2015/15965) for residential development. Hence site not to be taken forward.
SK131	Land adjacent to 11 Mill Bridge;	0.011		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK132	Belle Vue Mills, Broughton Road;	0.278		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.

SK133	Land between Swadford Street and Albert Terrace	0.05		Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis as the site has an overall site size less than 0.1 hectares, and/or cannot accommodate five or more dwellings.
SK134	Land east of Shortbank Road	11.93		The site is located within, adjoining or adjacent to a principal town, key service centre, and local service centre or service village identified in the local plan settlement hierarchy. Site does not move past a Level 1 acknowledgement, and the site is not suitable to undergo a Sustainability Analysis. The site is judged to be located at an inappropriate distance from the built up area of the settlement in the Spatial Strategy.
SK136	Land adjacent Clay Hall Farm, Broughton Road	1.12		Planning Permission outline approval (63/2016/17312) for erection of 20 dwellings and including site SK136. Approval for the erection of 2 dwellings (63/2016/17352).

*Pre Publication Draft Craven Local Plan (June 2017) Sustainability Analysis can be view at <http://www.cravenc.gov.uk/newlocalplan>

** Craven Local Green Space Assessment (2017) can be view at <http://www.cravenc.gov.uk/article/4456/Planning-policy-facts--figures#Studies>

Craven District Council

1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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