

MATTER 2



JohnsonMowat

Planning & Development Consultants

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

September 2018

MATTER 2

Objectively Assessed Need and the Housing Requirement (Policy SP1)

CLIENT: KCS DEVELOPMENT LTD

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



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1.0 INTRODUCTION

- 1.1 This statement should be read alongside previous representations submitted on behalf of KCS Development Ltd in relation to the emerging Craven Local Plan.
- 1.2 It should be noted that we do not consider it necessary to answer all of the Inspector's Questions. For the avoidance of all doubt those that we do wish to respond to have been set out.
- 1.3 It is not the intention of KCS Development or Johnson Mowat to appear in person at the Matter 2 session; the contents of this Statement should therefore be relied upon.

2.0 RESPONSE TO INSPCTOR'S MATTER 2 QUESTIONS

- 2.1 We have significant concerns regarding the housing requirement as set out in Policy SP1.
- 2.2 We note that the Policy wording is expressed as a minimum of 230 net dwellings per annum across the plan period. The inclusion of the word minimum is supported.
- 2.3 We note that the Council's Strategic Housing Market Assessment (SHMA) has been produced to assess the District's OAN and evidence the Local Plan's housing requirement. It is noted that a number of updates have been produced as the Local Plan has progressed.
- 2.4 It is our view that the housing requirement should be higher.
- 2.5 Johnson Mowat remain of the view that an employment job led scenario should be the preferred starting point. It is our view that the use of an employment led housing OAN would assist in support growth in the local economy.
- 2.6 The SHMA details a 20% uplift to the demographic base rate to account for market signals and past trends in delivery. Whilst we welcome an uplift to account for the rising house prices and worsening affordability we consider a 25% uplift is more appropriate. The SHMA suggests that the market uplift is based on the Local Plan Expert Group (LPEG) recommendations. Appendix 6 to the LPEG report sets out a number of uplift thresholds, in line with the recommendations of the report an uplift of 25% would be appropriate in Craven. In this respect we align ourselves with the view of the HBF.
- 2.7 Such an uplift would help to address the affordability issues identified.
- 2.8 In conclusion we maintain that the housing requirement is too low and should be increased.