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Dated: September 2018



**Craven Local Plan Examination**

**Matters, Issues and Questions**

**Matter 2 – Objectively Assessed Need and the Housing Requirement (Policy SP1)**

Prepared by

I D Planning

On behalf of

Keyhaven Homes

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## 1. Response to Matter 2

### Issue 7 – Housing Requirement

**Q1 – Is the housing requirement justified and is it based on robust, up-to-date and available evidence? If not, what should the housing requirement be, and how have alternative figures been calculated?**

- 1.1 The housing requirement proposed in the Local Plan is not justified.
- 1.2 We object to the proposed approach to meeting housing need for Craven and the Council's proposed approach of taking forward growth option F (230 dwellings per annum) set out in the Housing Growth Option Paper (Addendum 2017).
- 1.3 The SHMA Update 2017 identifies an OAN figure for Craven District as a whole is 242 dwellings (a baseline of 141, with a long term migration adjustment to 199 and a headship rate adjustment to 202) with a further uplift of 40 to take account of market signals. This figure has been apportioned with 206 dwellings in the Craven District LPA and 36 to the Yorkshire Dales National Park.
- 1.4 The rejection of the higher Housing Growth Options C1 (242 dwellings per annum) and E (280 dwellings per annum) and the Council's decision not to assess any option in the Growth Option Addendum (November 2017) that would meet the full, objectively assessed need for market and affordable housing is UNSOUND.
- 1.5 As highlighted at paragraph 4.2 of the consultation document, the NPPF requires local authorities to use their evidence base to ensure that, unless there are robust grounds why not, then the housing requirement should meet the full, objectively assessed need for market and affordable housing in their area. At paragraph 4.14 of the consultation document it is advised that the proposed housing requirement figure of 230 dwellings per annum will not meet the full need for affordable housing. It is stated that higher growth options assessed in the Local plan Housing Growth Options Paper have been rejected because of their conflict with the plan's spatial strategy and the significant uncertainty over their deliverability.
- 1.6 Such an approach clearly conflicts with the aims of the NPPF and the Council's own objectives in the Local Plan, particularly given the Council identify Affordable Housing Need as a 'Key Issue' for the Craven Plan Area at paragraph 2.41 (Key Issues).
- 1.7 In the Housing Growth Option Paper Addendum (November 2017) it is acknowledged at paragraph 4.15-4.16 that even Option E (280 dpa), the Council's highest growth option in this Paper, is likely to fall short of meeting the full objectively assessed need for market and affordable housing. The Council state that this option is likely to be an unsustainable and undeliverable option and as such there is 'no need to consider any higher alternative growth option to that of Option E'. We do not agree with this conclusion.

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- 1.8 It is suggested at paragraph 4.14 that higher growth options have been rejected because of their conflict with the plan's spatial strategy and the significant uncertainty over their delivery. We do not agree with this conclusion, in particular Keyhaven Homes have a deliverable and developable site in Skipton, the most sustainable location for new development and which lies in Flood Zone 1. Site SK119 was proposed for allocation at the draft consultation stage but is no longer proposed for allocation as the Council consider a suitable access cannot be achieved as the delivery of the site is dependent upon the adjoining consented scheme being developed out.
- 1.9 Site SK119 is in the same ownership as the adjoining housing commitment site (114) which the Council have granted planning permission for residential development. The requirement for the adjoining consented site to come forward first is not an insurmountable constraint; it is merely a matter of timing that is wholly achievable with the 15 year plan period. This is an example of a sustainable and deliverable site in the main settlement of Skipton that could deliver additional dwellings without significant risks to the environment or loss of land at medium / high risk of flooding and which accords with the plan's spatial strategy. This demonstrates the Council's chosen growth option is not sound as they have not fairly considered all reasonable alternatives in rejecting the higher Housing Growth Options.
- 1.10 It is also noted at paragraph 5.15 of the Housing Growth Option Paper that the Council suggest that the level of housing required in Skipton for Growth Options C1 (1,533 dwellings) and E (1,959 dwellings) cannot be met as a maximum yield in Skipton from suitable sites is suggested to be 1,402 dwellings. Again, we do not agree with this conclusion as previously identified, site SK119 which was identified for allocation at the draft consultation stage, remains a suitable and deliverable site which could deliver up to 210 dwellings and would increase the capacity in Skipton to at least support Option C1 (1,533 dwellings).
- 1.11 The Council acknowledge at paragraph 5.36 of the Housing Growth Option Paper Addendum (November 2017) that supporting Housing Growth Option 'F', the provision of 230 dwellings / annum will result in approximately 66% of the 126 dwellings per annum identified affordable housing need in the housing market area being delivered, based on 30% affordable housing provision. It is suggested at paragraph 4.18 of the consultation document that the Council is proactive in seeking to maximise affordable housing supply through its action plans and strategies and on all opportunity sites, but this does not constitute a strategy for delivering the unmet need. The NPPF is clear (paragraph 182) that a plan should be prepared based on a strategy which seeks to meet objectively assessed requirement including unmet requirements from neighbouring authorities where it is reasonable to do so. There is no evidence within the consultation document that Craven has an agreement in place with neighbouring authorities to deliver the unmet need.
- 1.12 On the basis of the preceding assessment, it is maintained that **Policy SP1 and the evidence base which sits behind it is UNSOUND** as it is:-
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- Not positively prepared as the policy does not meet the full objectively assessed need for market and affordable housing and has not set out a strategy for unmet needs being addressed in neighbouring authorities.
  - Not justified - preferred housing growth option F (230 dwellings per annum) cannot be justified and the Council has not fairly assessed all reasonable alternative options. The Council has not provided robust evidence to demonstrate why the higher housing growth options are not sustainable particularly in light of the delivery of affordable housing being a key issue for the District and the availability of additional suitable sites in Skipton, which I have highlighted (SK119).
  - Not consistent with national policy – the policy does not comply with the requirement in the NPPF for the full objectively assessed need for market and affordable housing to be met and it is not accepted that there are no further suitable sites in Skipton which could meet a higher level of housing need.