



Craven Local Plan Examination

Matter 6

Statement by Craven District Council

Matter 6 – Housing Land Supply

Hearing Day 5—Wednesday 17th October 2018 (Week 2)

September 2018

Issue 1 – the Five Year Housing Land Requirement

Q1. What is the basic five-year housing land requirement, what is it based on and how has it been calculated?

Council's Response

1. The basic five-year housing land requirement is 1,150 dwellings. This is based on the housing requirement in Policy SP1 of 4,600 which equates to an annual average housing requirement of 230 dwellings per year multiplied by 5 years.

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

Council's Response

1. The Craven Local Plan Housing Trajectory 2012 to 2032 (2018 Update for Submission) (Ref SD004) shows that between 1 April 2012 and 31 March 2018, a net total of **924** new dwellings has been gained, which gives an annual average delivery rate over the six years from the start of the plan period on 1 April 2012 to 31 March 2018 of **154** net additional dwellings per year as shown in Table A below:-

Year	Number of Net Completions	Net Annual Average Completion rate
2012/2013	118	
2013/2014	31**	
2014/2015	128	
2015/2016	187	
2016/2017	230	
2017/2018	230	
Total	924	154

* **Note:** the figures in the above table are taken from the latest Authority Monitoring Report (AMR) 2016 -2017 (SD003) apart from the 2017/18 net completions which will be included in the next annual AMR update in December 2018.

** **Note:** Please note that the figure of 31 for net completions in 2013/2014 in Table A above is a correction of the figure presented in the AMR for 2016-17. This is because gross completions were reported for this year in the AMR in error.

2. The annual average is particularly influenced by the weak delivery in 2013/2014

of only 31 net dwellings, which was somewhat anomalous and out of line with general delivery trends. More recent performance has been closer to the annual housing requirement, with 230 net completions in 2016/2017 and 230 net completions in 2017/2018.

Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and also to ensure choice and competition in the market for land.

Q3 Taking the longer term- view, how has the Council performed against previous annual housing requirements? Does this represent the ‘persistent undersupply’ defined by the Framework? In this context, should the buffer be 5% or 20%?

Council’s Response

- 1 Taking the longer term view, Table B below shows housing completions in the seven years prior to 2012 compared to the relevant development plan housing target for Craven that was in force over that period, namely the Yorkshire and Humber Plan Regional Spatial Strategy (RSS).

Table B- Completions 2005/6 to 2011/12

Year	Annual Housing Target/Requirement in RSS	Net Housing Completions*	Net Average Annual Completion Rate
2005/06	250	165 (gross)	
2006/07	250	199 (gross)	
2007/08	250	148 (gross)	
2008/09	250	289	
2009/10	250	83	
2010/11	250	129	
2011/12	250	267	
Total	1750	1280	183 dwellings pa

*Net housing completions not available for 2005/6 to 2007/08

2. Examination of completions over a longer timeframe looking at both Table A and

Table B, shows that there has been persistent under delivery of housing in Craven, therefore to comply with paragraph 47 of the NPPF, the Council considers a 20% buffer is appropriate and should be applied to the five year housing requirement.

Q4 If a 20% buffer applies, should this be applied to the basic five year requirement, or the five year requirement and any undersupply?

Council's Response

1. The Council has applied the 20% buffer to the five year requirement and the undersupply. See response to Q6 below.

Q5. If there has been an undersupply, should this be addressed within the next 5 years (the 'Sedgefield' method) or over the remainder of the plan period (the 'Liverpool' method)? Is the Council's approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?

Council's Response

1. As detailed in the response to Q2 above, there has been an annual average delivery rate of **154** net additional dwellings per year between 1 April 2012 and 31 March 2018. This is a shortfall of **76** dwellings per year against the housing requirement of 230 dwellings per year (or a total of **456** dwellings) over the 6 years since 1 April 2012.
2. The Council considers that the undersupply in the first 6 years of the plan period should be addressed within the next 5 years (the 'Sedgefield' method) which is consistent with the advice in the PPG that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.

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

Council's Response

1. Taking all the above into account, the five-year housing land requirement is 1,610 dwellings or 322 dwellings per year and is set out in the table below :-

a	Local Plan Policy SP1 Housing Requirement for Craven outside the Yorkshire Dales National Park 1 April 2012 to 31 March 2032 (20 year period).		4,600
b	Average annual housing requirement 1 April 2012 to 31 March 2032	$a/20$ years	230
c	5 year housing requirement	$b \times 5$	1150
d	Total net completions 1 April 2012 to 31 March 2018 (6 years)		924
e	Net average annual completions 1 April 2012 to 31 March 2018	$d/6$ years	154
f	Shortfall 1 April 2012 to 31 March 2018	$(b-e) \times 6$	456
g	5 year housing supply requirement 1 April 2018 to 31 March 2023	$c + f$	1606
h	Twenty percent buffer	$g \times 0.20$	321
i	Total five year requirement 1 April 2018 to 31 March 2023 including twenty percent buffer	$g + h$	1927
j	Average annual housing requirement 1 April 2018 to 31 March 2023	$i/5$	385

Issue 2 – Supply Methodology

The PPG states that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

The PPG also advises that the size of sites will be an important factor in identifying whether or not a housing site is deliverable within five years. Plan makers should consider lead in times and build out rates to ensure a robust five-year housing land supply. Taking this into account:

Q1. What evidence is there to indicate that the sites with planning permission will come forward as illustrated in the Craven Local Plan housing trajectory 2012 to 2032 (2018 Update for Submission)?

Council's Response

1. The Council monitors all sites that are under construction or have planning permission or are subject to the prior approval process, and, as set out in paragraph 3.39 and 3.40 of the Strategic Housing Land Availability Assessment (SHLAA) Update 2018 (Ho010), evidence provided by individual developers/landowners in their responses to the Council's land availability questionnaire and "Sites with Consent Questionnaire" (a sample copy of which is attached at Appendix 1 to this Matter paper) has informed an assessment of whether any individual sites of 5 or more dwellings with planning permission are not likely to be implemented within the five year period (see Q 3d and Q4b of Appendix 1) and expected timescales for delivery of individual sites and their expected delivery rates (see Q5a to 5e of Appendix 1)
2. In the case of large sites of more than 200 dwellings (there is only one such site with planning permission in the current identified supply) , it is likely to take longer than 5 years to be completely built out, so only a proportion of the dwellings on this site are expected to be delivered within 5 years. For small sites with planning permission of fewer than 5 dwellings, an estimated rate of delivery of 45 dwellings per year based on evidence of past trends is applied (See also response to Q9 under Issue 4 of this Hearing Statement and Appendix 3)

Q2. Are there any sites in the Housing trajectory which have a resolution to grant planning permission subject to the completion of a planning obligation? If so, how has this been taken into account in determining deliverability?

Council's Response

1. Yes. The Housing Trajectory has taken account of responses on S106 Agreements and their anticipated completion and this has been factored into delivery timescales (See Qs 2, and 3a to 3d at Appendix 1).

Q3. How does the Housing Trajectory take into account sites with outline planning permission, compared to sites with full planning permission?

Council's Response

1. The Housing Trajectory takes account of developer responses on their expected timescales for submission of reserved matters applications, which can vary depending on the extent of reserved matters to be approved and are factored into delivery timescales. (See Q 4a and 4b at Appendix 1)

Q4. What lead in times and build out rates have been applied to sites with planning permission?

Council's Response

1. As stated in the response to Q1 above, lead in times and build out rates are based on an individual assessment of each site taking account of responses by the individual developer/landowner (See Q5a to 5e of the Council's "Sites with Consents Questionnaire" at Appendix 1)

Q5. Have the same lead in times and build out rates been used for sites across Craven? If so, is this appropriate and justified?

Council's Response

1. No. See response to Q4 above.

Q6. How has the Council calculated the deliverability of sites without planning permission? Have different lead in times and build out rates been used?

Council's Response

1. As set out in paragraph 3.39 and 3.40 of the Strategic Housing Land Availability Assessment (SHLAA) Update 2018 (Ho010), evidence provided by individual developers/landowners in their responses to the Council's 'Land Availability Questionnaire' and "Allocated Sites Questionnaire" (a sample copy of which is attached at Appendix 2 to this Matter paper) has been used to inform the calculation of the deliverability of individual allocated sites without planning permission. Lead in times and build out rates have therefore been assessed for each individual site rather than applying a blanket assumed lead in time or build out rate.

Q7. How has the Housing Trajectory taken into account that some sites may not come forward due to unforeseen circumstances. Has a lapse rate or allowance for non-deliverability been applied? If so, has it been applied to all sites?

Council's Response

1. The Housing Trajectory shows an overall delivery of 5,569 dwellings over the plan period. The housing requirement target for the plan period in Policy SP1 is 4,600 dwellings, so an allowance or buffer of 21% is accounted for in the Housing Trajectory supply, rather than applying a specific lapse rate to all sites based on past trends.
2. Furthermore, the Housing Trajectory is based on individual site-by-site

assessments of expected performance, with engagement with land owners and developers, and site performance has been adjusted accordingly. The use of a generic lapse rate is not seen to be necessary in such circumstances and could be seen as a form of 'double counting'. However, it can be noted that with the available buffer in terms of the supply exceeding the requirement by a generous amount, a lapse rate (across all components of the supply) would have to be in excess of 15% before it would put the delivery of the requirement at risk. In other words, even if only 85% of the supply was delivered (4,734), it would still meet the requirement for 4,600 units. Such a high lapse rate across the board is not regarded as realistic.

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

Council's Response

1. Yes, based on the latest available evidence, the estimated delivery of sites is realistic, reasonable and justified.

Issue 3 – Components of Supply

Q1. What is the justification for including 93 dwellings coming forward within the first 5 years at Station Works, Cononley (site ref CN006)? How does this account for any relocation of existing businesses and conversion of the mill buildings?

Council's Response

1. The Station Works Mill building had been largely vacant for several years before the planning application was submitted in 2016 and the few remaining businesses relocated shortly after. Full planning permission was granted in January 2018 (with executed S106 Agreement on affordable housing and open space contributions). Work commenced on site in March 2018. A planning application amending the approved scheme was approved in July 2018 (Ref 2018/19329) increasing the total number of dwellings on the site to 94. The conversion and extension of the Mill building is well underway and construction of the new build dwellings on the site is also in progress. Completion of the scheme is expected within 5 years. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.

Q2. What is the current status regarding development proposals at St Monica's Convent, Gargrave? The latest Housing Trajectory states that planning permission was granted in 2013 and expired in 2016. Given the amount of time

which has elapsed, what is the justification for including 70 dwellings within the first 5 years?

Council's Response

1. **Note:** St Monica's Convent is located on Gargrave Road Skipton (not the village of Gargrave). The site ref is SK142.
2. Full planning permission (ref 63/2011/12082) was granted in February 2013 for a Change of Use and refurbishment of the former St Monica's Convent (including demolition of later addition extensions and outbuildings), with proposed 3-4 storey new build extensions and 3-4 storey new build block within the grounds, to 70 age restricted residential apartments. Works commenced on site in December 2014, so the permission was implemented and remained extant. However work stalled on the site in 2015 and no further progress was made on the conversion of the convent. Pre application discussions on a revised scheme were undertaken in 2017 and a full planning application was submitted in January 2018. Full planning permission was granted in June 2018 (ref 63/2018/18950) for the construction of 58 extra care apartments on the site (100% affordable). The developer (Housing and Care 21) has confirmed that they intend to start on site in December 2018. Completion of the scheme is therefore expected within the first 5 years. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.

Q3. What is the justification for including 105 dwellings coming forward within the first 5 years at North Parade, Skipton (site Ref SK114 and SK124)

Council's Response

1. Outline Consent (Ref 63/2012/13167) on the northern section of SK114 for residential development was granted in March 2013; a subsequent reserved matters application for 105 dwellings was approved in August 2016 (63/2015/15503). A lead in time of 24 months was factored into the trajectory to allow sufficient time for the sale of an area of land owned by Skipton Town Council to the developer to be completed for a start on the site in 2018/19 and an initial delivery of 10 dwellings by end of 2018/19 with a build out rate of about 40 dwellings per year thereafter.
2. An application (ref 63/2018/19441) to vary condition 17 of outline application reference 63/2012/13167 granted 13th March 2013 to require highway improvement works to be approved before the occupation of 30 dwellings instead of prior to the commencement of the development was approved in July 2018.
3. An application (ref 63/2018/19310) to discharge condition no. 2 (footpath links) and condition no. 4 (designing out crime) on reserved matters planning

application referenced 63/2015/15503 was also approved in July 2018.

4. An application (ref 63/2018/19309) to discharge condition no. 4 (materials), condition no. 5 (Flood Risk Assessment), condition no. 6 (foul and surface water drainage), condition no. 8 (archaeology), condition no. 12 (engineering details), condition 19 (construction access and parking), condition no. 21 (site compound details) and condition no. 22 (construction traffic management plan) on outline planning application referenced 63/2012/13167 was approved in August 2018.
5. Works commenced on site in August 2018. The developer of the site is Keyhaven Homes, Skipton Ltd and in their response to the 'sites with consent' questionnaire indicated that 10 dwellings would be delivered in 2018/19 and the remainder of the site at a build rate of approx. 40 per year. Completion of scheme is expected within 5 years. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.

Q4. How has the delivery of 145 dwellings been calculated on land north of the A692 and west of Carleton Road, Skipton (site ref SK094)

Council's Response

1. Note : Site ref should be SK049 not SK094.
2. The outline consent granted for this site in 2016 (ref 63/2015/15792 is for a mixed use development comprising business/employment floorspace (use classes B1, B2 & B8) and 225 residential dwellings (use class C3) with access from the A629 and Carleton Road, provision of infrastructure and associated landscaping.
3. An application to vary conditions of original planning consent reference 63/2015/15792, specifically: no.s 1, 5, 8, 9, 10, 13, 15, 16, 21, 24, 26, 27, 28 to permit separate discharge in relation to development in the residential and employment sub areas shown on the approved plans; no 12 to clarify if the proposed limitation on external lighting equipment relates to the construction period only; no 23 to reduce the on-site affordable housing requirement from 40% to 20%; no 32 to require provision of the ball stop netting prior to first occupation of any dwelling on site was submitted in May 2017 and approved in March 2018.
4. After factoring in a lead in time of 18 months for discharge of conditions, the submission of reserved matters and site preparation works, the trajectory anticipates an initial delivery of 25 dwellings in 2019/20 and a build out rate of 40 dwellings per year thereafter, which would result in 145 dwellings being delivered within 5 years.
5. An application (ref 63/2018/19241) to discharge condition no. 25 (archaeological work) of planning permission 2017/18136/VAR granted 16/03/2018 was submitted in April 2018 and approved in May 2018.

6. An application (ref 63/2018/19584) to discharge conditions 3, 5, 7, 8, 9, 17, 19, 20, 23, 24, 26 and 27 of planning approval referenced 2017/18136/VAR granted 16/03/2018 was submitted in July 2018 and is pending decision.
- 7 A reserved matters application (ref 63/2018/19563) was submitted in July 2018 for 181 dwellings and is pending decision. The inclusion of this site in the Housing Trajectory for delivery of 145 dwellings within 5 years is therefore justified.

Q5. What is the current status regarding the completion of Section 106 agreements at Malsis Hall, Glusburn and Hawbank Fields, Skipton? How has this been factored into the calculation of the 5 year housing land supply position?

Council's response

1. **Malsis Hall** , Glusburn (site ref SC085) – The Section 106 Agreement has been executed and the planning decision notice was issued on 14th August 2018. Works have commenced on site by the developer Seddon Homes and the 67 dwellings are expected to be delivered within 5 years. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.
2. **Hawbank Fields**, Skipton (site ref SK088) - The Section 106 Agreement is expected to be completed and the decision notice issued within the next 4-5 weeks. The landowner via their agent has confirmed in their representation to the Publication Draft Local Plan in support of SK088 (Representation ref 053/01/SP5/GC) that the “*scheme has already attracted a significant level of developer interest and will be taken to market once the Section 106 agreement and planning permission are secured.*” The response by the landowner to the Allocated Sites Questionnaire indicated submission of a reserved matters application by the end of 2018 with site preparation works completed by mid-2019. This has been factored into the Housing Trajectory to indicate the initial delivery of about 20 dwellings in 2019/20 with a build out rate of 40 dwellings per year over the following 3 years. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.

Q6. Taking into account the site constraints, in particular the requirement to either increase the width of Horse Close Bridge or provide a new access over the canal, what is the justification for including 74 dwellings coming forward within the first 5 years on land west at Sharphaw Avenue (site ref SK061)?

Council's Response

1. The Council commissioned a full Transport Assessment report (Curtins) in 2015 ,

along with a Bridge Options Report (Mason Clark Associates) and a design was agreed in 2015. Grant Funding (£2.3m) has been awarded by Homes England (July 2018) for the infrastructure work. Previous costs estimates for the bridge works ranged from £440,000 - £770,000, the grant funding therefore is sufficient to fully fund these works that will include the bridge and roadway access into the site itself.

2. SK061 is to be developed for housing through the Joint Venture Partnership between Craven Council and Barnfield Developments. The joint venture partnership was formed in 2018 with the intention of developing CDC owned land using private sector funding and public sector land to bring new housing and employment to the district. A feasibility study is currently underway and plans have been drawn showing a development of 76 houses on the site, including the provision of 22 affordable homes. The proposal is being market tested and appraised. The initial review shows the development is viable.
3. The plans below show that vehicular access across the canal would be achieved via a new bridge. The bridge itself does not provide access directly into the site, instead it provides an improved vehicular access to this area of Skipton to the north of the canal.



- Non-developable area due to Flood Zone
- Existing trees to be removed
- 2 bed/4 person Affordable
- 3 bed/5 person Affordable
- 3 bed/5 person Private Sale
- 4 bed/7 person Private Sale

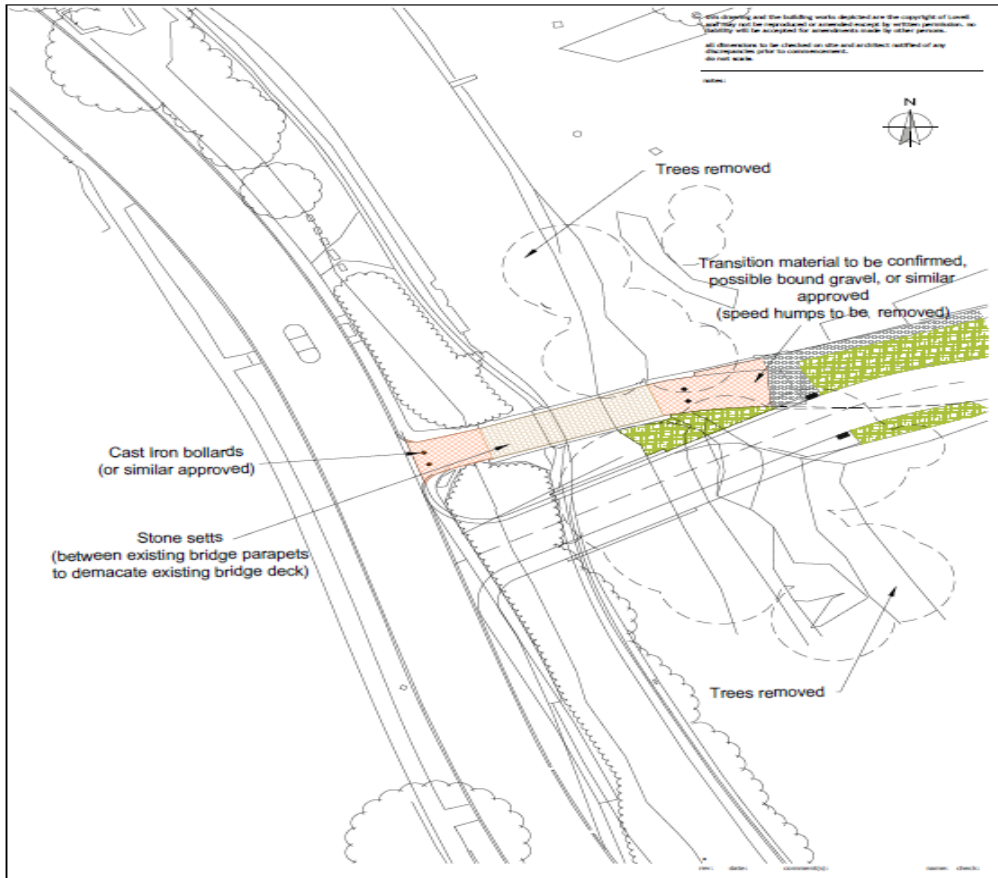
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BARNFIELD/CRAVEN DC

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plans, all conditions should be reported to the appointed Principal Designer.
 This drawing is the Property of Bowman Riley Architects Limited © DO NOT SCALE FROM THIS DRAWING

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cat reference: 01_P20181 - Home Club, Sharpshaw - 01 Dec 2017 - Existing Presentation - Planning/SK01 - SK1 - Health & Safety



4. The planned programme to deliver the site is to complete the viability appraisal by the end of October 2018 and submit a planning application later in 2018, with a planned start on site in 2019 and completion of the site in 2022 at an average construction pace of 3.6 units per month. All infrastructure and enabling works will be completed by March 2021 in line with the requirements of the Homes England funding offer. The Local Plan Housing Trajectory at the time of its preparation in March 2018 factored longer lead in times for development of this site, with an expected start date in 2020/21 as a decision on grant funding had not at that point been made. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.

Q7. What is the justification for including 50 dwellings coming forward within the first 5 years on land south of Runley Bridge Farm (site Ref SG064), including 10 dwellings in 2018/19?

Council's Response

1. An outline application (ref 62/2017/18064) with some matters reserved for an employment led mixed-use development, comprising the construction of a new Business Park incorporating B1 Business Units, B2 General Industrial units, a car dealership and residential development was submitted to the Council in May 2017. The number of 50 dwellings was based on an indicative site area of approx. 1.5 ha (out of a total site area of 5 ha) for residential development at 32 dwellings per ha and this potential yield was included in the Housing Trajectory and delivery timescales were based on responses from the developers of the site to the "Allocated Sites Questionnaire".
2. However, objections to the application by Natural England (on ecology and landscape impact grounds) have delayed the progress of the planning application as the applicants sought to provide additional information to address Natural England's concerns. The Council received an indicative layout plan of the site in July 2018 from the applicants which sought to illustrate how landscape impacts could be mitigated through layout of development and landscaping of the site. This showed the layout of 19 dwellings at the northern end of the site which is likely to be a more realistic estimate of the number of dwellings to be delivered on the site. The planning application is to be considered by the Council's Planning Committee on 24th September 2018.
3. There is no evidence to suggest that dwellings on this site cannot be delivered within the first 5 years, although a more realistic yield of 19 dwellings (rather than 50 dwellings) will need to be included at the next update of the Housing Trajectory.

Issue 4- Windfall Allowance

Paragraph 48 of the Framework states that local planning authorities may make an allowance for windfall sites in the five–year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. Taking this into account:

Q8. What allowance has been made for windfall sites coming forward over the first 5 years, and thereafter throughout the plan period?

Council’s Response

1. No allowance has been made in the Housing Trajectory for windfall sites of 5 or more dwellings. An allowance has been made in the Housing Trajectory for small windfall sites of less than 5 dwellings to be delivered at a rate of 45 dwellings per year for the first 5 years and thereafter throughout the plan period.

Q9. What is this based on and is it justified on appropriate available evidence?

1. The allowance of 45 dwellings per year for small sites takes account of existing extant planning consents or approvals subject to S106 Agreements and prior approvals on small sites in the Housing Trajectory 2018 (349 dwellings), sites of less than 0.1 ha without permission in the SHLAA Update 2018 and which are not residential gardens (33 dwellings), evidence on lapse rates for small sites (10 per year) and historic delivery rates on small sites (51 per year). Details of lapsed consents and historic delivery rates are provided in Tables 1 and 2 in Appendix 3 to this Matters paper.
2. A 5 year supply of small sites based on the historic delivery rate of 51 dwellings per year would equate to 255 dwellings. The total supply from consents/prior approvals and available SHLAA sites is 382 dwellings (349 + 33). If the lapse rate of 10 dwellings a year is applied to the supply of 382 dwellings, then about 332 dwellings could be delivered within 5 years (382-50), which would be a delivery rate of almost 66 dwellings a year (332/5). However, taking account of the historic delivery rate on small sites of 51 dwellings per year, it would not be realistic to apply a rate of 66 dwellings per year for the first 5 years or over the plan period. Also given that housing delivery on small sites can be influenced by a variety of factors that are difficult to predict (such as landowners’ personal circumstances), it was considered that an assumed delivery rate lower than the historic delivery rate would be prudent. It is considered therefore that the

allowance for small windfall sites within the Housing Trajectory is reasonable, realistic and justified by appropriate available evidence.

Q10. Having regard to the answers provided on the questions above, and questions regarding the OAN for housing under matter 2, will there be a five-year supply of deliverable housing sites on adoption of the Local Plan?

Council's Response

1. Yes. The 5 year housing land requirement to meet objectively assessed needs under the provisions of Policy SP1 of the Local Plan is 1,927 dwellings, or 385 dwellings per year. The Housing Trajectory demonstrates (after taking account of the response provided to Q7 of Issue 3 above) that there is a supply of deliverable housing sites on adoption of the local plan of 2,813 dwellings, which is equivalent to 7.3 years housing land supply

Issue 5 – Future Supply

Paragraph 47 of the Framework states that local planning authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10, and where possible, years 11-15.

Q1. How has the Council arrived at the figures in the Housing trajectory for years 6-10 and 11-15?

Council's Response

1. Figures in the Housing Trajectory after the first 5 years were arrived at through exactly the same process as described in the response to Q4 under Issue 2 of this Matters paper.

Q2. What factors were taken into account in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?

Council's Response

1. The same factors were taken into account for sites identified in the Housing Trajectory to be delivered after the first 5 years as those taken into account for sites identified to be delivered within the first 5 years.

Q3. Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?

Council's Response

1. Yes, because the Local Plan not only identifies a specific supply of deliverable sites for the first 5 years of the Plan, it also identifies specific, developable sites for the remainder of the plan period that are likely to be deliverable at the point envisaged.

Issue 6 – Flexibility

Q1. What flexibility does the plan provide in the event that some of the larger sites do not come forward in the timescale envisaged?

Council's Response

1. Flexibility is provided in the plan for the scenario outlined in the question in two different ways. First, the overall supply which has been identified is comfortably in excess of the housing requirement. It is not therefore necessary for all components of the supply to come forward, either at the time envisaged or at all, in order for the Plan's housing requirement to be achieved in the plan period. Flexibility is therefore provided by having additional sources of supply already 'built in' to the Plan's housing provision. Second, in addition to this comfortable margin in the supply, Policy SP4 I) a) provides a policy mechanism for additional sites to come forward, over and above those currently identified, in the event that it is demonstrated that the planned growth for a settlement will not be delivered..

Q2. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

1. Yes. In the Council's response to Q8 under Issue 3 of Matter 4, a proposed modification to paragraph 4.49 of the supporting text to Policy SP4 sets out how the Council's annual monitoring of the plan will assess whether or not each settlement's planned growth is being delivered . The publication of this information on an annual basis will then inform decision makers, developers and local communities on the need to release additional sites in accordance with Policy SP4 I) a).

Craven District Council

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

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



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