

**EXAMINATION OF  
CRAVEN LOCAL PLAN (CLP)**

**MATTER 2 – ISSUES 1 TO 4 AND 7  
POLICY SP1: OAN AND THE HOUSING  
REQUIREMENT**

**ON BEHALF OF**

**MESSRS WILMAN: LAND AT ELSEY CROFT**

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## 1.0 INTRODUCTION

This Hearing Statement is submitted by Carter Jonas LLP for and on behalf of the Wilman Family, owners of land and property, predominantly to the east of Skipton. The Family's interest in the Local Plan specifically relates to the two draft allocations SK089 and SK090, but also the relevant parts of the spatial strategy and policy framework. This Statement responds to selected questions set out in Matter 2 of the Inspectors' Matters and Issues. Other Statements are submitted in respect of: Matter 3 – Affordable Housing Need (Policy H2); Matter 5 (Residential Allocations); Matter 6 Housing Land Supply; Matters 7 and 8 – Affordable Housing and Housing Mix; and Matters 11 and 12 Infrastructure and Education Provision.

Those Issues and Questions identified by the Inspectors are included in **bold** and *italic* for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of , and should be read in conjunction with the representations submitted to the Pre-Submission Consultation (February 2018) and other Hearing Statements.

Carter Jonas is invited to attend and participate in the relevant Examination hearing sessions.

As a note part of the draft Allocation (the western most field) is in the ownership of Craven District Council. The Agent is aware of a joint venture between Craven District Council and Barnfield Construction to bring their site forward for residential development, and the availability of funding for enabling works to facilitate delivery. That funding is however time constrained. The agent and landowner have indicated that there is no objection in principle for the Council's site to come forward in isolation where it does not prejudice the delivery of the wider allocation and proposals within it. All parties have agreed to an ongoing dialogue.

## 2.0 MATTER 2 – OBJECTIEVLY ASSESSED NEED AND THE HOUSING REQUIREMENT (SP1)

### Issue 1 – Housing Market Area ('HMA')

***Q1. What evidence supports the use of a HMA for Craven, having particular regard to levels of containment and household migration? Does it accord with national guidance in the PPG?***

***Q2. How has evidence relating to commuting patterns been taken into account? Does this support the use of a HMA for Craven?***

***Q3. How does the proposed HMA relate to neighbouring authorities?***

Evidence presented in the Council's SHMA indicates that the Craven HMA is complex whichever data source is used; for example, TTWA, migration, housing search areas, school retail catchments etc. Much of the HMA overlaps with other administrative boundaries and shows a moderate level of self-containment.

Adjoining planning authorities have indicated that they have not included Craven within their own HMA's therefore it is a pragmatic approach for the Council to identify the District as a HMA. Therefore it is important for the Council to ensure that it works closely with neighbouring authorities to ensure that the appropriate level of housing is delivered.

### Issue 2 – Population and Household Projections

***Q1. What is the demographic starting point derived from the 2014-based household projections? How does this compare to the latest mid-year estimates? What are the reasons for the differences?***

***Q2. How has the "re-based" scenario (141 dpa) been calculated?***

***Q3. Why has the SHMA<sup>8</sup> assessed internal rates of migration over 6 years and 15 years? What are the reasons for the variation?***

***Q4. How does the SHMA consider household formation rates, what are they based on and are they robust?***

***Q5. Paragraph 6.11 of the SHMA and the table that follows (Table 6.1) applies a partial return "...in which the 2014-based headship rates for the 25-34 age group return to a mid-point between the 2014 and 2008-based rates by 2033". Have the same adjustments been made for other age groups?***

***Q6. What are the main reasons for the change in the demographic starting point from the 2016 SHMA Update<sup>9</sup> (188 dwellings)?***

***Q7. How has the need for accommodation for older people, especially older people who want to stay in their own home, been taken into account in establishing the housing requirement? Is this set out in the Local Plan?***

It is important that the prudent measures set out in the SHMA which include an alternative headship rate for 25 -34 age group are applied. Such measures to provide an uplift in headship rates for this group are appropriate to reverse what is a negative trend in the District.

### Issue 3 – Market Signals

**Q1. The PPG advises that household projections should be adjusted to reflect appropriate market signals, as well as other market indicators. How does the evidence demonstrate that Craven is performing with regard to:**

- Land prices;**
- House prices;**
- Rents;**
- Affordability;**
- Rate of development; and**
- Overcrowding**

Inclusion of a market uplift is appropriate in the circumstances of affordability in the District. Evidence set out in the SHMA demonstrates that the affordability of median house prices worsened between 2005 and 2016 with the house price to earnings ratio increasing from 7.0 to 8.3.

### Issue 4 – Affordability

**Q1. How has affordability been assessed as part of the SHMA? How does the House Price Ratio and the Rental Affordability Ratio compare with neighbouring authorities and the national average?**

**Q2. How have ratios determined the level of uplift proposed to the demographic starting point? Is the proposed uplift justified and based on available evidence?**

**Q3. What impact will the proposed uplift have on issues relating to affordability in Craven?**

A comparison of the House Price Ratio (HPR) and the Rental Affordability Ratio (RAR) with comparator District, the Region (Y&H) and England is contained in Table 5.2 of the SHMA. This suggests that the HPR for Craven is higher than most comparator Districts the Region, and England. The RAR at 36.3 is higher than all comparator Districts and the Region, but less than England as a whole.

An uplift based upon the Local Plan Expert Group's (LPEG) recommendations is advocated by the SHMA given the HPR and RAR figures. This suggests a 25% uplift.

An appropriate uplift in housing provision is supported as this should help to address the affordability issues and to counter the worsening affordability issues apparent in the District.

**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?***

Carter Jonas submitted comments in relation to the Plan period which would affect the Plan requirement.

### 3.0 CONCLUSION

In conclusion on Matter 2 we maintain the Local Plan should:

- Increase the housing requirement
- plan positively for housing delivery; and
- Give appropriate consideration to viability.

Carter Jonas  
25 September 2018