

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

**MATTER 8 – ISSUES 1 & 2
HOUSING MIX (SP3)**

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 8 of the Inspectors' Matters and Issues. Other Statements are submitted in respect of: Matter 2 – OAN and the Requirement (Policy SP1); Matter 3 - Affordable Housing Need; Matter 5 - Residential Allocations; and Matter 6 - Housing Land Supply.

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 HOUSING MIX AND DENSITY (SP3)

Issue 1 – Housing Mix

Q1. What is the justification for Policy SP3 a) which sets out a specific mix of house types that will be required as part of proposals for new residential development?

Q2. Is it appropriate to apply the same mix of house types across the plan area? For example, how would a decision-maker ensure that proposals for new development made an efficient use of land and promoted or reinforced local distinctiveness, especially in highly accessible urban locations?

Q3. Does Policy SP3 apply to all housing, including proposals for affordable housing?

Q4. Does the Local Plan include sufficient flexibility to allow for changing circumstances in the mix of new housing required?

Set out in the Council's background paper "Approaching Housing Density and Mix" (Feb 2017) (Doc H001) are a series of findings and recommendations derived from the 2017 SHMA. There is a distinction between the two documents as the SHMA is clearly not intended to be definitive or prescriptive. Indeed the SHMA findings simply state the need for more 2, 3 and 4 bedroomed homes.

Considering the analysis we would suggest that a small change in any one of the assumptions used could make a significant difference in the mix required; a point made in the SHMA.

Whilst the policy has been amended to add flexibility, substantial change is required so that development proposals are appropriate to their location, local needs and to accommodate changing circumstances. It is important that flexibility is provided such that the policy is workable and does not compromise or stall otherwise acceptable development through overly prescriptive requirements or the need for additional evidence.

It is considered policy should have a flexible approach and recognise that needs and demands will vary from area to area and site by site.

Issue 2 – Housing Density

Q1. What is the justification for Policy SP3 b) which sets out a standard density of 32dph across the plan area and across all tenures?

Q2. Is it appropriate to set out a density target for the whole plan area given the differences between towns such as Skipton and Settle and more rural areas?

Q3. How does Policy SP3 ensure that development will optimise the use of land, especially in urban locations that are well served by public transport?

Q4. Is it clear to decision-makers, developers and local communities what density of development will be required and where? Is the policy effective?

Within SP3 b) the Policy criteria set out appear to be derived from the “Approaching Housing Density and Mix” Background Paper (H001). It suggest the housing mix will influence density. It is not appropriate to set a standard density target for the whole plan area given variations between settlements. It is not appropriate to apply a standard density across different sites in the same settlement.

The policy should include a component to ensure that the policy enables development proposals in different parts of the District to reflect their location and local needs. It is important that the policy is not too prescriptive so as to compromise or stall otherwise acceptable development or require substantial additional evidence to justify departure from the policy.

3.0 CONCLUSION

In conclusion we maintain the Plan fails to:

- provide sufficient flexibility on housing density and mix; and
- justify overly prescriptive policies.

Carter Jonas
25th September 2018