

**REPRESENTATIONS ON
BEHALF OF
SKIPTON PROPERTIES LIMITED**

**MATTER STATEMENT
CRAVEN LOCAL PLAN
EXAMINATION**

MATTER 8

SEPTEMBER 2018

Skipton Properties Limited

Examination of the Craven Local Plan

Matters Statement

Matter 8 – Housing Mix and Density (Policy SP3)

Issue 1 – Housing Mix

1. Question 1 – 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?

1.1 There is no justification for Policy SP3. The Policy is derived from insufficient evidence and cannot be justified.

1.2 The Council relies on the 2017 SHMA as justification for this Policy as the mix split as currently drafted in Policy SP3 has been taken directly from the 2017 SHMA Update (paragraph 7.16 p89). The table 7.3 sets out a suggested dwelling mix by market and affordable housing tenures.

1.3 The SHMA however only provides an overview and provides no analysis of how the need or demand for differing house types will vary over the district. It also represents no more than a snap shot in time. In reality, the demand for different house types and sizes can vary quickly depending on complex interrelating factors including the availability of different sizes of second-hand housing stock. This point is amply illustrated by the preceding version of the SHMAA 2016 which shows a markedly different suggested dwelling mix just 12 months earlier.

1.4 Importantly, the Council decides to use the combined 'Overall' housing mix percentage in draft Policy SP3. This is a meaningless figure as it has the effect of artificially skewing the housing mix that the Council will seek to apply in a Development Management scenario.

1.5 To illustrate the point, if an Applicant submits a Planning Application for ten market dwellings – where there is no requirement for affordable housing to be provided on site – the Policy could be interpreted to reduce the amount of four bed market housing and more than double the amount of 1/2 bed housing which the actual evidence base suggests is required for market housing. The starting point in that scenario should be that the SHMAA suggested mix for market housing is actually for 19% 2-beds – not 40%.

1.6 As drafted the Policy attempts to introduce some flexibility at Criterion C by stating the very specific housing mix percentages will be applied as general guide flexibly. This does not offer sufficient comfort because, for the reasons set out above, the starting point for the application of the 'general guide' range is fundamentally flawed. If the starting point is flawed, the rationale for the policy as drafted indicates that the Council is seeking to prescribe a specific housing mix using a flawed interpretation of the evidence base in order to require a great proportion of smaller market dwellings than is actually required.

2. **Question 2 – 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?**
 - 2.1 It is completely inappropriate to apply the same mix of house types across the plan area given the differing characteristics of the District and the variety of proposed housing allocations in terms of scale.
3. **Question 3 – Does Policy SP3 apply to all housing, including proposals for affordable housing?**
 - 3.1 Criterion (a) specifies that the housing mix is to be applied to ‘all tenures’ which as drafted could only be interpreted as including proposals for affordable housing. This may restrict flexibility to agree specific housing types required by Registered Providers.
4. **Question 4 – Does the Local Plan include sufficient flexibility to allow for changing circumstances in the mix of new housing required?**
 - 4.1 Whilst the Policy as drafted states that the housing mix will be used as a general guide the Policy states very specific figures which will inevitably be interpreted by decision makers as the **required** split. For the reasons stated earlier the justification for the split is fundamentally flawed. Greater flexibility must therefore be introduced into the Policy by deleting criterion (a) and all references to the specific guide range of percentages; and by amending Criterion (c) so that it is more generic and flexible.

Issue 2 – Housing Density

5. **Question 1 – What is the justification for Policy SP3 (b) which sets out a standard density of 32dph across the plan area and across all tenures?**
 - 5.1 This is a matter for the Council to explain in their matter statement upon which we may wish to comment.
6. **Question 2 – Is it appropriate to set out a density target for the whole plan area given the difference between towns such as Skipton and Settle and more rural areas?**
 - 6.1 The differences between parts of the District suggest that application of a standard density across the District may adversely affect local distinctiveness. A case to illustrate this is proposed Allocation SG25 which now benefits from a Planning Permission (subject to completion of a S106 Agreement). In that case, the density of the development was reduced below this standard in order to ensure local distinctiveness in the design and layout was reinforced, taking into account the characteristics of the surrounding parts of Settle.
7. **Question 3 – How does Policy SP3 ensure that development will optimise the use of land, especially in urban locations that are well served by public transport?**

7.1 This is a matter for the Council to explain in their matter statement upon which we may wish to comment.

8. Question 4 – Is it clear to decision-makers, developers and local communities what density of development will be required and where? Is the policy effective?

8.1 The Policy is completely ineffective. It offers no reasonable guidance to developers – the specified mix is fundamentally flawed as is the generic application of a density that takes no account of the variety of site characteristics across the District.

Walton & Co
25th September 2018