

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

**MATTER 3 – ISSUES 1 TO 3
POLICY H2: AFFORDABLE HOUSING NEED**

ON BEHALF OF

MESSRS WILMAN: LAND AT ELSEY CROFT

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Contents

1.0	INTRODUCTION	1
2.0	MATTER 3 -AFFORDABLE HSOUNG REQUIREMENT.	2
3.0	CONCLUSION	4

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 3 of the Inspectors' Matters and Issues. Other Statements are submitted in respect of: Matter 2 – OAN and the Requirement (Policy SP1); 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 3: AFFORDABLE HOUSING (H2)

Issue 1 – Definition of Affordable Housing

Q1. Does the Plan include a definition of affordable housing? If not, in order to be effective should one be included?

A definition is contained in Annex 2 of the Framework. It is not necessary for the Local Plan to repeat the definition verbatim.

Issue 2 – Affordable Housing Need

The SHMA states that there is an annual imbalance of 126 affordable dwellings per year. This is expressed as the overall need from the housing register compared with the current supply of affordable housing. In response, Policy H2 requires a minimum of 30% of dwellings on qualifying sites to be affordable.

Q1. What is the difference between the affordable housing need identified in Policy H2, and the uplift applied to the demographic starting point to reflect affordability issues in Policy SP1?

Q2. What is the justification for requiring 30% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?

Q3. Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Local Plan expected to deliver?

Q4. How does this compare to the identified need?

Q5. How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5-10 years?

Q6. The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?

Q7. What is the justification for requiring proposals of 6-10 dwellings on greenfield sites in designated rural areas to make an equivalent financial contribution?

A 20% uplift is suggested in the SHMA to take account of market signals and affordability. This issue seems to address the “affordability” rather than the need for affordable housing. The SHMA does not suggest an adjustment to take account of the need for affordable homes.

It is unlikely that the 126 dwelling annual requirement identified in the SHMA will be satisfied by Policy H2. It is important that in deriving the affordable housing need that the policies should take account of a viability alongside housing need. Policies in the Framework (Para 173) notes the

importance of viability testing to ensure that sites and schemes are not burdened (with tariffs and other policies) such that their ability to be developed is threatened.

It is important that the language used in the Policy does not refer to “exceptional circumstances”, and merely seek to refer to the viability of development as this will be the most likely reason for a reduction in the provision of affordable housing.

Issue 3 – Viability

Q1. How have the residential typology assumptions been defined in the Local Plan Viability Assessment and Local Plan Viability Assessment Addendum Report? Do the scenarios for Skipton (up to 290 units) and the rest of the District (up to 150 units) reflect the allocations in the Plan?

Q2. How have existing use values been determined? Are they based on appropriate available evidence?

Q3. How have infrastructure costs and other contributions been taken into account in the calculation of scheme viability?

Q4. Is the 30% affordable housing requirement viable for all types of housing, supported by viability evidence?

A note of caution should be applied to existing use values. It is important to ensure that the land values achieved are sufficient to ensure that land is released by the owners ensure it is brought to the market for development.

A reduction of the Policy requirement (to 30%) is welcomed, although it is not helpful for the policy to suggest 30% as a minimum. This is considered to be too high and may well impose a threat to viability. The Policy should suggest “up to 30%”.

3.0 CONCLUSION

In conclusion on Matter 3 we maintain the Local Plan should:

- plan positively for housing delivery;
- Reduce the affordable housing requirement on candidate sites; and
- Give appropriate consideration to viability.

Carter Jonas
25 September 2018