Representor: Cathmal Ltd (852)

Response to Inspectors’ Matters, Issues and Questions

Matter Three: Meeting housing need and the Plan’s Housing Requirement including the accommodation needs of travelling communities.

Response to Questions 3.1

Please refer to written submission to 2019 six-week consultation.

Whichever methodology is used to determine housing requirement it must capture the needs of all communities who require land to meet their housing aspirations. For the reasons given in response to questions 1.1 and 1.6 the Council’s assessment of housing need is too narrow to inform a sound Local Plan.

Response to Questions 3.12 and 3.17 and 3.18

Please refer to written submission to 2019 six-week consultation.

The Plan has made no specific provision to provide land to meet the needs of people aspiring to commission or build their own homes or for people of limited means who do not wish to jointly own their own homes. Broadening the question, as it should be broadened, nor has the Local Plan provided land to meet the needs of people resorting to the district for a caravan Park Home – a cheaper housing type that is often very popular with older people. The Local Plan is therefore unsound because it does not comply with national policy.

“Encouragement” is meaningless without provision of land. NPPF 59 states that it is important for the Local Plan to provide a sufficient amount and variety of land where it is needed to meet the needs of groups with specific housing requirements and; NPPF 61 makes it very plain that the Council’s provision of housing land must meet market demand arising from each and every sector in the housing market and not just those groups listed specifically in the paragraph (the words “including but not limited to” and “type” define the breadth of provision mandated in NPPF 61).

Providers of caravan Park Homes need land that they can afford to buy. They cannot compete in the open market for land with providers of traditional housing. Therefore, for the Local Plan to fail to designate land for caravan Park Homes is to suppress a legitimate demand arising from a free market economy and is to discriminate – unwittingly – against a certain group of people by denying them the choice they have a right to expect. Further, it misses related opportunities to achieve a better fit between household size and local housing stock and to deliver cheaper ownership options and to secure investment in the local leisure industry because very often the local people who move into a caravan Park Home are older and by down-sizing release under-occupied dwellings and windfall funds to spend on local entertainment.