**Para 2.2 Vision**

The vision comprises well-meaning phrases with which few can object. However the reality is that the narrative is flawed because it contains mutually exclusive aspirations.

2.3 If an area is ‘sought after and desirable….a place where people want to live, work, do business, shop and spend their leisure time’ it will have expensive house prices. Alternatively if you extend the built environment you may reduce the price of housing but only by making the District a less desirable pace to live and work, which in turn will have consequences for the local economy.

2.4 There are no improvements to the Leeds-Harrogate-York rail line and that will continue to affect the ability of the district to be a key driver of the North Yorkshire economy. It was the rail line in the 19th century that helped the development of modern Harrogate and it is the lack of updating of the lines that will hamper future development because much needed workers cannot access the district quickly and comfortably.

2.5 The district’s economy is no more resilient than before. Like all areas it undergoes structural change by operation of the market economy. It is subject to typical economic cycles and only out-performs other towns and districts due to the relatively high number of social grade ABs in the district (30% compared with 23% nationally). This gives the district a resilience in certain, but far from all, sectors.

2.6 Unsupported assertions about ‘much needed new homes in sustainable locations across the district’. The plan is based on an untested presumption that building houses and allocating land for employment will attract economic growth beyond that achieved currently. See comments on para 2.3 above – we suggest that the scale of development proposed will reduce the desirability of the district as a place people want to live, work, shop and spend their leisure time

2.7 Another unsupported aspiration suggesting that somehow the development of new housing and employment will result in a significant investment in the road and rail infrastructure and a suggestion that it will also remove the hills and improve the weather so that people are prepared to walk and cycle in place of driving and using public transport. The reality is that the roads will be gridlocked, the environment will be harmed and people will want to avoid the town and its primary service villages. The Infrastructure Development Plan at paras 4.11, 4.12, 6.1 and 6.12 make it clear that no serious and costed consideration has been given to the transport infrastructure or the water/sewerage infrastructure.

2.8 Nice words which sit totally at odds with the proposed development of Special Landscape Areas in the district

2.9 Another wonderful aspiration for which there is no action proposed in the plan.

2.10 More carefully chosen words that are not followed through by specific policies and the evidence of recent housing developments suggests that major housebuilders will continue to develop mundane, cheap to build generic housing that takes little account of local distinctiveness.

2.11 The Borough Council’s track record on exploiting local opportunities for development and enhancing heritage assets is woefully inadequate giving little prospect for this worthy aspiration being fulfilled.

**GS1 Providing new homes and jobs**

**3**.5 The plan numbers are based upon the July 2017 Housing and Economic Development Needs Assessment (HEDNA) carried out by GL Hearn. It comprises 199 pages of analysis based on multiple data sources and many assumptions. HBC has taken the highest development site requirements in terms of both housing numbers and employment land area. This includes an economic uplift of approximately 60% in house numbers from 395 to 669 houses per annum. It is illogical and irrational given the number of assumptions that have been made in the HEDNA and the lack of knowledge as to how people will want to live and work by 2035. Whilst it is accepted that economic growth can influence housing needs there is less certainty that increasing house numbers created economic growth.

GL Hearn based its forecast on a 1.9% growth rate for the UK economy, but in September 2017 the Treasury downgraded its 2017 growth forecast to 1.6% and 1.4% for 2018 whilst the OECD predicts only 1% growth for the UK economy in 2018.

The impact of Brexit was ignored by GL Hearn as their work was carried out to soon after the referendum for the impact to be known. Whilst it is still too soon to be definitive, at the beginning of February 2018 government papers have been leaked that suggest the north of England could see a 13% reduction in economic activity due to Brexit; a massive reduction that is not even considered in the HEDNA. Read the Economist article <https://www.economist.com/news/britain/21736178-harrogates-downward-migration-trend-few-years-ahead-britains-how-it-faring>

The ‘economic uplift’ applied to housing need is exaggerated and not justified and this has resulted in an unattainable annual and 5-year housing supply target. The Publication Draft Local Plan seeks to achieve these high targets by means of a Growth Strategy and Delivery Plan which has identified housing allocations in areas which will not enable sustainable development.

3.6 HBC believes that shortage of ‘affordable housing’ is a fundamental problem in the District. ‘Affordable housing’ is defined in the NPPF as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, are not considered as affordable housing for planning purposes.

HBC has not included any robust measures in its plan to ensure that the required level of truly affordable housing is delivered in the plan period and in a way that makes it sustainably affordable.

3.10 GL Hearn based its forecast on a 1.9% growth rate for the UK economy, but in September 2017 the Treasury downgraded its 2017 growth forecast to 1.6% and 1.4% for 2018 whilst the OECD predicts only 1% growth for the UK economy in 2018.

The impact of Brexit was ignored by GL Hearn as their work was carried out to soon after the referendum for the impact to be known. Whilst it is still too soon to be definitive, at the beginning of February 2018 government papers have been leaked that suggest the north of England could see a 13% reduction in economic activity due to Brexit; a massive reduction that is not even considered in the HEDNA. Read the Economist article <https://www.economist.com/news/britain/21736178-harrogates-downward-migration-trend-few-years-ahead-britains-how-it-faring>

3.11 The HEDNA concludes that 54.8 hectares of employment land are required over the District. With 16ha of vacant land on existing employment sites the requirement should become 38.8 ha. The gross requirement is based firstly on labour demand projections of 17.6ha which was increased to 28.2ha to provide flexibility. A separate forecast was made by extrapolating development rates from 2006 to 2016 and that concluded with a need for 49.8 ha based on looking at different use classification requirements. The importance of this is that future employment is likely to require more land per employee (in manufacturing, distribution and retail). However the HEDNA then uplifts the allocation for flexibility again, thus double counting. Furthermore there is no recognition of the fact that the high earning jobs that HBC is keen to create actually require **less** space per employee than traditional manufacturing, distribution and retail (which are all low paid).

3.12 Unsubstantiated claim and one that leads to over development with greenfield sites preferred over brownfield sites as they are cheaper and easier to develop.

**GS2: Growth Strategy to 2035**

3.14 Theoretically sound argument that is not valid due to the poor quality of the transport corridors and, in particular, the rail link between York-Harrogate-Leeds and the road network.

3.18 It is not satisfactory to propose such a vague and unclear location without being more specific so that comments can be made at this stage of the Local Plan process.

3.20 Whilst Pannal has been designated as a Primary Service Village the proposed development sites render it a suburb of Harrogate rather than a village and as such it would no longer qualify as a Primary Service Village. It is an historic village which will be lost if the proposed developments are allowed.

**GS5: Supporting the District's Economy**

 3.38 The plan is predicated on a desire to increase employment opportunities in the District and a belief that requires housing for all the employees. The NPPF states that plans should support an economy fit for the 21st century. The plan is based on creating an economy fit for the 20th century.

Commuting, not necessarily on a daily basis, is part of life for many people who choose to live somewhere distant from their workplace because of house prices, family ties, lifestyle choice etc. This will be increasingly the case as more workers become home-based and probably more join the gig economy rather than being employees. This will impact also on retirement ages with many more people than suggested by the Experian data used by GL Hearn in the HEDNA report working well beyond state pension age. People living in Harrogate already work globally and increasingly Harrogate businesses will have workers across the globe.

The key to a thriving local economy is ease of access and it is the rail and road infrastructure that will constrain the District’s economic growth far more than housing. For those who need or want to commute there should be low cost efficient and ‘clean’ (both physically and environmentally) public transport. In 2018 we have heard already that the rail improvements scheduled for 2020 are unlikely to happen.

3.40/41 The ‘higher value’ growth sectors that HBC has selected for its Economic Growth Strategy are not aligned fully to its employment land allocations. The highlighted sectors are:

* *Creative and digital* – this sector is increasingly working through associations of small businesses and individuals that come together for specific projects but are essentially ‘gig economy’ players. Many operate from home and/or use serviced office facilities on a short term rental basis. The space required per employee is minimal and flexible.
* *Scientific research and development* – this sector is currently a large employer in Harrogate due to the significant presence of Covance which is based in Harrogate for historic reasons. The lack of a higher education community and proximity of university cities (particularly Leeds and York) with science parks and incubator units will hamper significant expansion of this sector in the Harrogate District.
* *Financial and professional services* – again some employment from historic employers but unlikely to increase significantly as the regulatory regime for such businesses is leading to greater consolidation and therefore concentration of offices in cities (York, Leeds and Bradford). There will be growth in the number of individuals working in this sector who work from home for all or part of each week. Other professional services such as accountancy and law are increasingly being consolidated too. Their appetite for offices in Harrogate is predicated primarily upon the potential private client market which are the social grade ABs that are currently c30% of the population.
* *Logistics –* a sector that provides relatively few jobs in relation to the land it occupies and one that requires above all a road infrastructure to facilitate the movement of goods. The lack of road capacity in the District precludes development of this sector other than in along the A1 corridor. Furthermore logistics is not a high wage sector.

3.44 The statement that ‘*the success of the Harrogate district as a business location is, in part, due to its attractive built and natural environments and its highly skilled workforce’* requires comment. The proposed land allocations are of such magnitude and location that they will adversely affect the attractive built and natural environment. If Harrogate has such a highly skilled workforce why is the District’s median wage so low? The highly skilled residents are deploying their skills outside the District and creating employment opportunities in lower skilled and lower waged jobs in the District.

**GS6: Sustainable Development**

3.59 Sustainable development has economic, social and environmental dimensions and they are meant to carry equal weight. The Draft Local Plan ignores completely the acknowledgement of environmental and social benefit that has been given to Special Landscape Areas eg Crimple Valley.

**GS7 Health and Wellbeing**

3.70 ‘*The planning system, and new development in particular, can make a real difference ………..helping residents experience a high quality of life is, therefore, a key theme that cuts across many policies of the Local Plan*’.

3.71 ‘*This Local Plan makes provision for appropriate housing, improved access to local services, healthy transport choices such as cycling and walking, access to green infrastructure, open space and active recreation, good design of the built environment, and promoting renewable energy and energy efficiency to help address fuel poverty’*. Words that sound good but the reality is that the pan proposes over development and due to the lack of appropriate infrastructure to support the development it will have a negative effect on the health and wellbeing of residents.

**EC1: Protection and Enhancement of Existing Employment Areas**

4.2 The HEDNA concludes that 54.8 hectares of employment land are required over the District. With 16ha of vacant land on existing employment sites the requirement should become 38.8 ha. The gross requirement is based firstly on labour demand projections of 17.6ha which was increased to 28.2ha to provide flexibility. A separate forecast was made by extrapolating development rates from 2006 to 2016 and that concluded with a need for 49.8 ha based on looking at different use classification requirements. The importance of this is that future employment is likely to require more land per employee (in manufacturing, distribution and retail). However the HEDNA then uplifts the allocation for flexibility again, thus double counting. Furthermore there is no recognition of the fact that the high earning jobs that HBC is keen to create actually require less space per employee than traditional manufacturing, distribution and retail (which are all low paid).

**HS1: Housing Mix and Density**

5.1 The Local Plan is based on the HEDNA but there are no safeguards to ensure that the housing mix that gets built will match the needs identified in the HEDNA. In the private sector the house developers will land bank until they are able to maximise the return on their land and they’ll do that by building whatever gives them the greatest return.

The aspirations set out in the succeeding sub-paragraphs will all be overwhelmed by developers presenting evidence that they cannot make an acceptable return on the type of housing envisaged by HBC and thus getting consents to build what they want.

**HS2: Affordable Housing**

5.15 The plan numbers are based upon the July 2017 Housing and Economic Development Needs Assessment (HEDNA) carried out by GL Hearn. It comprises 199 pages of analysis based on multiple data sources and many assumptions. HBC has taken the highest development site requirements in terms of both housing numbers and employment land area. This includes an economic uplift of approximately 60% in house numbers from 395 to 669 houses per annum. It is illogical and irrational given the number of assumptions that have been made in the HEDNA and the lack of knowledge as to how people will want to live and work by 2035. Whilst it is accepted that economic growth can influence housing needs there is less certainty that increasing house numbers created economic growth.

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*Housing*

HBC believes that shortage of ‘affordable housing’ is a fundamental problem in the District. ‘Affordable housing’ is defined in the NPPF as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, are not considered as affordable housing for planning purposes.

HBC has not included any robust measures in its plan to ensure that the required level of truly affordable housing is delivered in the plan period and in a way that makes it sustainably affordable.

5.19 This contains the get-out for all housebuilders and will ensure that affordable housing needs are not met. The Homes & Communities Agency Housing Statistics Report for April – October 2017 published on 28 November 2017 shows that the proportion of house builds started (excluding London) in that period that were affordable was 52% of the total compared with an average of 60%-70% in recent years.

**TI1: Sustainable Transport**

6.4 Completely undeliverable and unrealistic. The proposed developments will lead to increased traffic and pollution because:

* The Leeds-Harrogate-York railway line improvements are no longer certain yet without them the creation of a sustainable transport system is impossible.
* The existing road infrastructure already cannot cope with traffic yet there are no plans to change it
* The aspiration to encourage people to cycle and walk ignores the reality of the climate and topography of Harrogate; they will take to their cars. Furthermore visitors will stop visiting if they cannot drive easily into the town and enjoy parking at a reasonable price (they will favour out of town shopping sites or visit nearby cities that are easier to access and increasingly offer attractive shopping centres eg Leeds and York.

6.9 The Strategic Transport Priorities Study and Sustainable Transport Supplementary Planning Document should be prepared before development land allocations are agreed.

**TI2: Protection of Transport Sites and Routes**

6.11 It is naive that the council can claim that people will walk and cycle along former railway line routes to fulfil part of their transport requirements. Climate and topology mitigate against the hoped for increase in pedestrian and cycling replacing motor cars for everyday life as opposed to leisure use.

**TI3: Parking Provision**

6.14 It appears that the Council’s plan is to reduce the available car parking and to restrict demand through pricing strategy. This is an unsound strategy given the lack of quick, comfortable and reliable public transport in the District and the dependency of the local economy on visitors. The higher than national proportion of people commuting by car is due to the lack of a suitable alternative. It is disappointing to see that there are no plans to introduce park and ride schemes despite the success of them elsewhere Eg York.

**TI4: Delivery of New Infrastructure**

6.25 The Infrastructure Development Plan and Infrastructure Capacity Study highlight a number of shortcomings that threaten the ability of the Local Plan to be fulfilled:

* Transport is a critical barrier with the lack of commitment to rail improvements, lack of provision of road improvements
* Water provision is dependent upon major works in central Harrogate if the development sites to the west and south of Harrogate remain in the plan. However no costing has been undertaken for any such work
* It is clear from the Infrastructure Capacity Study that the provision of healthcare, education and cycling routes is less capable of being fulfilled if the Local Plan places significant additional development alongside settlements rather than the development of new settlements.

**HP3: Local Distinctiveness**

8.57 The sentiment in this statement is sadly lacking in the proposed allocations of development sites. For example in Pannal PN17, PN18 and PN19 will have a seriously harmful effect on the village of Pannal, the features of which were set out so clearly in the 2011 HBC report ‘Pannal Conservation Area Character Appraisal’.

**NE4: Landscape Character**

9.44 The Local Plan states that the impact of development proposals on certain SLAs will be carefully considered. However this is clearly not going to be the case as, for example, PN17, PN18 and PN19 are all in SLAs and, even without the benefit of a Landscape and Visual Impact Assessment (LVIA) it is obvious that they will adversely impact those areas.

**Denis S Kaye**

**26 February 2018**