

CPRE response : City of York Local Plan Preferred Options

1. The overriding general objection to the Plan is the very significant allocation of Green Belt land for the provision of inflated and unrealistic housing targets.
2. The specific objection is to Policy H1 which makes provision for 21936 dwellings in the period 1st October 2012 to 31st March 2030 an average build of 1090 each year.
3. We would support the conclusion in the Arup Report that 850 dwellings a year would meet the objectively assessed needs of economic and population growth.
4. The key factors in assessing housing needs should be based on the mix of population and employment growth and changes in household size.
5. The forecast changes in each category during the Plan period are:-

	2011	2030	Growth	Change
Population*	198000	217800	19800	+10%
Jobs+	110000	126169	16169	+14.7%
Households*	83600	93960	10360	+12.4%
Dwellings^	84743	105436	21936	+24.4%

****Sub National Population Projections***

+Table 8.1 Preferred Options

^ Policy H1 Preferred Options

6. At the end of the plan period the inflated dwellings target is significantly greater than the trend based projected households.
7. The principal reason for this inconsistency is the target to provide over 5500 affordable homes in the next 17 years. There is no credible strategy in the Plan to meet this ambitious aspiration.
8. The removal of the priority for development on brownfield sites and the allocation of greenfield sites for new settlements is clearly designed to get developers to finance the provision of 270 affordable houses every year. Past performance does not support such an assumption.
9. The National Planning Procedures Framework (NPPF) para 154 specifies that a Local Plan should be realistic. Para 10.3 of the Plan acknowledges that delivering 1090 additional dwellings each year will be 'challenging'. The average annual completions in York over the last 5 years has been 463. There is no coherent strategy in the Plan to explain how this step change will be accomplished.
10. Despite the absence of an approved local plan York has been pursuing economic and employment policies not significantly different to the policies enumerated in this draft plan.
11. They have been successful and while other Northern manufacturing towns continue to struggle with industrial decline York is thriving. Unemployment is low and wages have climbed higher than the national average over the last decade. **Economist editorial July 2013*
12. We would submit that the key trends in population and jobs since 2001 are therefore a sound base to extrapolate. There are no new policies to substantiate the step changes required to meet the inflated housing projections and the excessive allocation of building land in the Green Belt.
13. Adopting more realistic housing aspirations would eliminate the perceived requirement for the wholly inappropriate proposed new town on good quality Green Belt land at Whinthorpe