

8th August 2017

Local Plan Consultation
Planning & Development
PO Box 787
Harrogate HG1 9RW

Dear Sirs

Harrogate District Authority Draft Local Plan additional sites consultation (July - August 2017)

The Campaign to Protect Rural England North Yorkshire (CPRENY) instructed KVA Planning to prepare the report for our response to the public consultation on the Harrogate District Draft Local Plan additional sites.

Local volunteers within the Harrogate area commented on the previous stages of the emerging Local Plan produced by Harrogate Borough Council (HBC/the 'Council'). Following administrative and governance restructuring to CPRENY, we welcome the opportunity to comment further at this stage in relation to the emerging Local Plan which is intended to replace the current development plans consisting of: Local Plan (2001); Selective Alteration to the Local Plan (2004) and its policies map; and the Core Strategy (2009).

Having had the opportunity to study the draft documents and associated supporting documentation, CPRENY are supportive of the fact that the Council have sought to allocated land away from national designations and not seek to redefine the Green Belt boundary.

The formation of a new settlement, whilst controversial and understandably resisted by existing communities, may be justified to prevent the unique characteristics of the existing settlements from being impacted to their detriment by the amount of expansion that would be required should a new settlement not be delivered. North Yorkshire and, in particular, Harrogate District, is well-known for its attractive vistas and landscapes which would be lost should this be required to occur.

However, CPRENY do have concerns that some areas, particularly to the south and west of Harrogate are in danger of being over-developed and would be keen to see the Special Landscape Areas protected from development.

CPRENY understands that the Council are not seeking comments on parts of the plan which have already been consulted upon, the attached report, prepared by KVA Planning on our instruction, answers specific questions relating to the additional sites as published July 2017. We wish to be kept informed about the future stages of this Local Plan preparation and ask to be notified when the Examination in Public is arranged.

Yours Sincerely

JMW Marley (Mrs)
Chair CPRENY

Question 1 - Do you have any comments on the updated evidence base?

CPRENY recognises the need to ensure that the link between the provision of employment land and the provision of new dwellings is based upon the most up to date evidence possible, so therefore welcomes the fact that the Council have published its Housing and Economic Development Needs Assessment (HEDNA).

CPRENY share the concerns, however, of many members of the public, in that the number of homes to be delivered across the district throughout the plan period appears to keep rising - the SHMA recommended a total of 11, 697 dwellings to be delivered in the plan period in June 2016. The production of the HEDNA, has revealed, one year later, that the actual number to be delivered should be 14,049 dwellings - which equates to some 2,300 additional homes. Given the number of natural constraints within the District that should be protected from development, CPRENY therefore, have a general concern that the number of new dwellings (669pa) and employment land (minimum of an additional 38Ha) purported to be required will have a detrimental impact upon the local distinctiveness, character and special qualities of Harrogate district and those settlements within the District where new development sites have been allocated.

Question 2- Do you have any comments on the selection process for the additional sites?

Whilst CPRENY believe that the overall number of new dwellings being planned for is too high, and will set out relevant concerns regarding specific sites in due course, the actual process of Site Selection appears to have been undertaken following a Sustainability Appraisal on all sites to identify the most 'appropriate' and 'sustainable' sites for delivery in accordance with the Council's objectives.

Question 3 - Do you have any general comments about additional housing allocations?

CPRENY are aware that the Council has planned to provide sufficient flexibility to ensure that a 'minimum provision' of 14,049 new homes are delivered across the district. CPRENY are concerned generally that whilst this is a 'minimum' figure, in line with planning policy recommendations in the PPG, the fact that HBC are already putting forward an increase of 2,300 homes over what was previously being planned for as a result of the HEDNA would seem to provide more than enough 'flexibility'. CPRENY are concerned that the current infrastructure and highways networks will not be able to cope with the additional number of dwellings and that the impacts on the natural environment, landscape and air quality will be impacted to its detriment, exacerbating current problems.

CPRENY are hugely concerned about the vast swathes of greenfield land being proposed to be developed throughout the district. However, whilst it is recognised that there is not a vast amount of available brownfield land within the District, CPRENY would hope that the Council would still operate a 'brownfield first' policy and direct all new development (whether housing or employment opportunities) to these areas prior to the development of any greenfield sites.

Housing Allocations

Sites H2, H69 and H87 (Land at Knox Lane, Knox Saw Mills and Knox Hill, Harrogate) - These sites adjoin the community of Knox Mill and are characterised by small stone-built cottages. CPRENY would wish to see development on these sites come forward in a sympathetic manner to



the existing buildings and would hope that no development would conflict with the vehicular restrictions already in place or impact on the Grade II Listed Spruisty Packhorse Bridge.

Site K24 (Halfpenny Lane and Water Lane, Knaresborough) Any development of this site, would need to be mindful of the Air Quality Management Area (AQMA) at Bond End and where possible, the encouragement of public transport.

Site K37 (Boroughbridge Road, Knaresborough) Whilst site K37 forms a natural rounding off to the built-up area, CPRENY are concerned that any development of this site will add to and increase problems caused by the current level of development (including that committee) in this area which may have a detrimental impact upon the AQMA of Bond End. In a similar way, CPRENY also believe that this proposal may detrimentally impact upon the Scriven Conservation Area.

Site B21 (Land at Aldborough Gate, Boroughbridge) This large site for a proposed 178 new dwellings adjacent to the Roman town of Aldborough. CPRENY are concerned that the construction of such a large number of new dwellings at this location would adversely impact upon the Conservation area and many historic sites and buildings contained within. The Council would need to be satisfied that the setting of this village would not be detrimentally impacted upon before allocating this site as a preferred option.

Site BL9 (Alfred Hymas Site, Burton Leonard) CPRENY are supportive of the re-use of this site. CPRENY acknowledge that brownfield land is a scarce commodity in the Harrogate district and therefore welcomes the inclusion of this site for development.

Site HM9 (land to the north of Meadow Close, Hampsthwaite) The proposed allocation of this site for 101 dwellings extends the current settlement northwards into the open countryside. Whilst many of the site allocations do indeed use land adjoining settlements within the open countryside, this site is particularly large and extends the settlement into a new direction. The majority of development within the settlement is to the south and east of the settlement. CPRENY believe that this allocation is too large at this site and it would therefore detrimentally impact upon the character of the village and result in a loss of local distinctiveness.

Site MK8 (Land south of Hugh Mill Farm, Markington) In a similar way to site HM9 above, CPRENY believe that this allocation for 46 dwellings would dominate the village of Markington to its detriment. The existing development line is linear within this section of the village. The development of this site would potentially create indefensible boundaries for the Council in terms of future windfall applications on sites set behind current dwellings in adjacent locations to this allocation.

Site TW3 (Church Farm, Tockwith) CPRENY are again concerned about the extent of this allocation to the north of the current settlement. This would be encouraging development set behind the linear existing development to the north of the village which currently affords open views of the countryside. CPRENY are of the opinion that this site would set the precedent for development in this part of the village. CPRENY are of the opinion that there is more opportunity for development to the south of the settlement and to the east adjacent to the existing solitary cul-de-sac (to the south-east, should this land become available and be viable and there is a need for development within the settlement).

Sites PN17 (land adjoining Spring Lane Farm, Pannal) and PN19 (Land to the west of Leeds Road, Pannal) CPRENY are concerned generally with the amount of proposed development surrounding Pannal. The amended sites, subject to this consultation, will create a total of 349 additional dwellings to that already committed to via the mixed-use site at PN15. The addition of these sites will completely alter the character of the settlement and extend it northwards into an area which has traditionally conserved the gap between Harrogate, Pannal and Spacey Houses and was designated as a Special Landscape Area (SLA) via Policy CS9 of the 2001 Local Plan. This policy remains extant for the purposes of decision making and states that the Council will give long term protection to the areas designated locally as SLAs.



Question 4 - Do you have any comments about additional employment allocations?

See responses to questions 1-3 above.

Employment Allocations

Site FX3 (Extension to employment site, Flaxby) Whilst this site does not have a dedicated rail link, it is close to existing road infrastructure network, in particular, the A59 and A1 and therefore from a planning policy point of view is an obvious site for this extension and location of employment land. CPRENY would wish to see the current landscaping and mature trees and hedges surrounding the site retained and enhanced where possible to encourage a network of green infrastructure. (Also, see comments relating to Flaxby in response to Question 7 below).

Site PN18 (south of Almsford Bridge, Pannal) Whilst this is a potential allocation for employment land, CPRENY recognises that is a further land allocation within Pannal and therefore the same justification for objecting to this allocation as that found above in relation to the potential housing allocations exist. The amount of land allocated through this new consultation is unacceptable in area which has been designated for its importance in terms of quality landscape, protection of the setting of Harrogate and prevention of coalescence between the 3 previously named settlements.

Question 5 - Do you have any general comments about the amended sites?

Please see comments below in relation to specific sites.

H49 (Windmill Farm, Otley Road, Harrogate) and H70 (Land east of Whinney Lane, Harrogate) Whilst from a planning policy point of view, CPRENY can understand why these specific sites have been increased to allow for an additional yield to be gained from these sites, in terms of rounding off the individual allocated sites. CPRENY, however, share the concerns of many members of the public residing in the south-west area of Harrogate, that this area is in danger of becoming over-developed and thus losing its character. With the additional extended sites and those already committed or proposed via the previous local plan consultation, the Council are proposing just under 3000 new dwellings and employment (mixed use) allocations within the area. This is the same number as the potential new settlement at Green Hammerton. Whilst, it is understood that the Council need to provide suitable and viable sites for development in line with their Objectively Assessed Need (OAN), CPRENY are concerned that the local transport infrastructure simply will not be able to cope with the additional volume of traffic generated by the developments and air quality will worsen.

With specific regard to H70, CPRENY are of the opinion that the two fields to the east of the site located between the proposed allocation and the existing settlement and north of the police training centre will, at some future date, also be put forward as development options or indeed via the planning application process as windfall sites, therefore increasing the development and impacting upon infrastructure further.

Question 6 - Do you have any comments about the approach to Gypsy and Traveller Sites?

CPRE campaign both nationally and locally for the protection and retention of Green Belt Land. Having had the opportunity to read the Gypsy and Traveller Accommodation Assessment (2017) that is currently being consulted upon, CPRENY understand that there is a requirement for six additional sites to be provided via the Local Plan process throughout the district over the plan period. Four of which are required in the first five years of the plan period.

Three private and well established sites currently exist in Knaresborough (two with temporary planning permission) which provide a settled base allowing the families to access education, health care and employment etc.

These three sites would contribute towards the four needed within the first five years of the plan period. However, all three are located within the Green Belt boundary surrounding Knaresborough.

Paragraph 17 of the Planning Policy for Traveller Sites states that a Local Planning Authority can make an exceptional alteration to the defined Green Belt boundary to meet a specific need identified for traveller site. As these sites are already well-established having had investment put



into the sites from the families who reside there, and are relatively adjacent to other built development and satisfies national planning policy, CPRENY would, in this particular circumstance, support this alteration. It is important that the Council reaffirms the boundary of the sites, to avoid future expansion into more designated Green Belt land.

However, CPRENY would wish to see evidence that the Council is considering designating an equivalent amount of Green Belt Land elsewhere in the District, ideally adjoining another designated area which could be rounded off.

Question 7 - Do you have any comments about the new settlement options?

CPRENY welcomes the opportunity to comment on the New Settlement Report (2017) and on site GH11 - Green Hammerton. The Harrogate District CPRE volunteers previously commented on the options for a new settlement in the previous consultation and favoured site FX3 Flaxby, stating that the use of this site (in particular, the golf course) would prevent a loss of good quality agricultural land at Green Hammerton which the NPPF seeks to avoid.

CPRENY understand the rationale for the creation of new settlement and welcomes the fact that the Council wish to avoid redefining the Green Belt which is also supported by the Government's Green Belt commitment in the recent Housing White Paper (2017).

CPRENY agree with the Council that due to the amount of new housing proposed (whilst considered to be too high) via the HEDNA, it would be unsustainable to direct all this new development to existing settlements within the district. Indeed, as mentioned previously in this response, CPRENY believe that too much of this has already been proposed to the south and west of Harrogate (surrounding Pannal). Not only would the transport infrastructure be unable to cope with this level of development in these locations, but access to education, health care and other facilities would also be severely impacted upon and the unique character of the existing settlements, many of which are frequented by tourists specifically for their character and aesthetic qualities, would be lost.

The local economy of North Yorkshire benefits greatly from tourism and the rise of the current trend of the 'Staycation', therefore, the proximity of the Yorkshire Dales National Park, the AONB and beautiful villages and towns surrounding the historic and scenic spa town of Harrogate all add to the attractiveness of the area as a destination.

CPRENY fully supports the Council's objectives for a new settlement, in particular the need for it to have its own identity and create a sense of place having been designed to a high quality.

CPRENY would hope that renewable energy generation would be incorporated into design specifications and pursued by the Council in any development briefs, particularly when air quality and climate change issues are so important for current and future generations.

CPRENY recommend that a detailed assessment of landscape, ecology, heritage and infrastructure be undertaken as soon as possible in respect of the Council's preferred option and potentially other options rating highly in their comparative analysis as this would aid the determination of a preferred option and provide further evidence to support such a decision. This would be useful, prior to the inclusion of a site in the next draft of the emerging Local Plan for consultation. Without this vital information, it is difficult for CPRENY to fully support a single option.

Based on the evidence presented by the Council to date, through the New Settlement Report, CPRENY believe that sites GH11 and CA5 may be the two most appropriate locations for a new/expanded settlement. Dependent upon the outcome of further evidence, as discussed above, CPRENY believe it may be possible and preferable to promote the two sites for expanded development, thus allowing less development to be required surrounding Harrogate, in particular, to the south and western fringes near Pannal. Notwithstanding this option, it may be appropriate for the Council to promote a mixed-use scheme at Flaxby (site FX3) which would incorporate the



employment site and a smaller yield (that proposed at Green Hammerton) of residential dwellings to support employment uses on the site and lessen the pressure on other settlements in the District.

In any such development, however, it is essential that the Council provide the appropriate mitigation and landscaping works to support the protection and extension of green infrastructure networks, the retention of existing trees and hedgerows wherever possible and avoid coalescence of settlements in order to allow settlements to retain their unique character.

Question 8 - Do you have any comments about allocations for educational facilities?

Due to the amount of new dwellings being promoted by the Council over the plan period, it will be essential that the Council provide sufficient access to educational facilities - including nursery provision alongside primary and secondary schooling.

Conclusion

CPRENY welcomes the opportunity to comment on the additional sites put forward by HBC and look forward to reviewing the subsequent publication version including further information regarding the potential new settlement in January 2018 in accordance with the timetable as set out by the Local Development Scheme published on the website.

CPRENY remain concerned about the transport infrastructure surrounding the district and its ability to cope with such a high level of growth as proposed throughout the plan period and the subsequent impact this will have on air quality, especially in those areas which already suffer from poor air quality.

CPRENY welcomes the fact that the Council are proposing to protect the Green Belt (with the exception of the small three traveller sites) in the district and would encourage the Council, wherever possible, to require developers to deliver brownfield land first as a priority in the first five-year plan period in order to prevent the need for the development of greenfield land where it is not necessary and to ensure that all brownfield land is delivered and not left redundant.

**Katie Atkinson MRTPI
for CPRENY**

