

Pannal & Burn Bridge Parish Council
Correspondence address: Parish Clerk, 6 Mill Lane, Pannal, Harrogate HG31JX

20 December 2016

Harrogate Borough Council Planning Policy
Council Offices
PO BOX 787
HARROGATE
HG1 9RW

Dear Sirs,

**HBC – DRAFT LOCAL PLAN 2018 – 2035: CONSULTATION PERIOD: Ending 23
December 2016**
SUBMISSION RELATING TO PROPOSED DEVELOPMENTS IN THE PANNAL AREA

Opening Statement:

This letter is the official response to the HBC Draft Local Plan 2018 – 2035 (*consultation period*) from Pannal and Burn Bridge Parish Council on behalf of the residents of the villages of Pannal and Burn Bridge. After a full consultation of the residents of the Parish we report as follows: All residents/households in the Parish were contacted by flyer (copy attached – App 1). Of those who responded, over 90% were against development of any kind in PN14 and over 98% were against the creation of a gypsy/traveller camp on site PN16. On behalf of our community therefore, the Parish Council is adamant in its objection to the additional development proposals for the Pannal area shown in the draft HBC Local Plan. ***We refer to PN14 and PN16 sites - both of which were late additions to the proposal.***

We write therefore to formally object to their inclusion on the following general grounds: -

Our first objection is that despite claims there has been a consultation, HBC has not consulted with the Parish Council or to our knowledge any other community body prior to the inclusion of sites PN14 and PN16 in the Draft Local Plan (2018 – 2035).

Our second objection is that were these sites to be adopted in the final Local Plan then that would effectively close the green space gap between Pannal and the suburbs of Harrogate, resulting in the village of Pannal losing its '***stand-alone***' village status and its individuality. PN14 and 16 are in the area of Pannal which is deemed the Middle Crimple Valley (area 58) in the HBC Landscape Assessment report of 2004. The Landscape Assessment states "Crimple Valley is important to the setting of Harrogate and provides an essential green "rural corridor" separating Harrogate from the village of Pannal and others. It is highly valued by local residents. This area plays an important role in separating Harrogate and Pannal and is sensitive to development which would result in coalescence. The capacity of this area to accept

change which would *not* result in coalescence is limited.” The final sentence is still correct in 2016: building in the areas PN14 and 16 would result in coalescence between the town of Harrogate and the village of Pannal.

We also object to the West of Harrogate Settlements plans because of total saturation of the road network. Severe traffic congestion already exists through Pannal & Burn Bridge and the safety of the residents therein is paramount. The circa 1000 extra homes applied for in the Harlow and Pannal Ash areas coupled with business expansion planned in the Cardale Park area would create an unsustainable burden of extra traffic on already overcrowded routes through Pannal and Burn Bridge seeking the fastest “rat run” route to the Leeds Road. We refer you to the HAPARA traffic survey, with Beckwithshaw & North Rigton Parish Councils’ comments & statistics at App2.

Although well up-dated in its methodology, the Sustainability Appraisal does not appear to reflect the changing opportunities presented by the land off the new roundabout to the South of Pannal. Sites PN14 and PN16 as presented would necessitate a new major access from both sides of the A61. We submit that the District Plan could be improved by centering the housing and other needs for Pannal closer to the new roundabout South of the village rather than by exacerbating traffic problems by creating a further access point half a mile further North between Pannal and Harrogate.

Objection to PN14

Our responses are many and detailed and are cross referenced on the HBC portal in many cases. From responses received we further object most strongly to PN14 on the following more detailed grounds: -

1. The proposed Development areas (applies to both PN14 & 16) fundamentally disregard SLA status and fly in the face of the criteria highlighted by the case officer about planning **refusal** dated 22-11-16 for application 6.152.19.OUTMA on Rosset Green Lane where the conditions stated are identical but on a potentially much larger scale in the case of PN14. At App 3 we have reproduced the Planning Officer’s reasons for refusal to support the objection and the contention these criteria should also be applied to the PN 14 (and PN 16) development plans.

2. PN14 West is an unsuitable site for housing development because a significant portion is within the recognised flood plain of Crimple Beck. At App 4, we have provided a small selection of photographs showing flooding in the area along with the Environment Agency’s flood map of the PN14 site. Clearly, building on PN14, particularly the West side can only exacerbate the existing problem.

3. Extending the existing Development limit to the Northern boundary of PN14 DOES NOT comply with several of the GS3 criteria for development limit extensions in the Draft Plan. To support this view, we have included at App 5 extracts from GS3 and have shown how

the plan contravenes the Council's document. We contend that three, at least, if not four, of the criteria will be contravened. These are listed in App 5.

4. Maintaining the separation and countryside characteristics between Harrogate and Pannal with Burn Bridge is the principal requirement of the Pannal Area Community-Led Plan.

5. Development of PN 14 & 16 would have adverse effects on the natural environment – wildlife, trees, flora and fauna of the Crimple Valley and the rights of way within it. Quoting here from the Save Crimple Valley submission - Objective 8 of the Appraisal (Biodiversity and importance of the natural environment) generates the following conclusion – *“High /medium landscape sensitivity: distinctive characteristics vulnerable to change. Medium/low landscape capacity; not able to accommodate development proposed and opportunities for mitigation limited”*

6. In Sustainability terms, PN14 scores poorly because it would be isolated from the village even more than Walton Park. There are better more sustainable opportunities for housing development around the new roundabout.

Objection to PN16

Responses to our leaflet demand that we formally object to PN16 on the following detailed grounds: -

1. As item 1 above - The proposed Development area fundamentally disregards SLA status and flies in the face of the criteria highlighted by the case officer about planning **refusal** dated 22-11-16 for application 6.152.19.OUTMA on Rosset Green Lane.

2. HBC's proposed development on this site would be inappropriate. The site currently provides a green space that is at the very heart of Harrogate's appeal as a tourist and conference centre. This area is the key southern entrance to the Borough.

3. The need for such a development is an unproven case and is inappropriate. To support this view, we have attached at App 6 and 7 as follows:

At App 6 we have included an extract from the ORS report “HARROGATE BOROUGH COUNCIL TRAVELLER HOUSING NEEDS SURVEY” produced in March 2013 which can also be seen on this link on the Borough Council's website:

https://www.harrogate.gov.uk/downloads/file/282/gypsy_and_traveller_housing_needs_survey_2013

Of particular relevance is the following extract (page 29 – “Broad Locations”) in which the final paragraph of the extract (“6.7”) states that: “should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the

settled community”. **PN16 clearly does not respect the interests of the “settled community”.**

At App 7 is an extract from the personal view of a resident into the suitability or not of a traveller site on PN16. His thoughts have been well researched and his summary dismisses PN16 as a suitable site on several counts.

4. PN16 sits alongside the A61; the only feasible access would be from Leeds Road. Such a development would not only diminish market values for housing in the immediate area but also anywhere within the parish or in Stone Rings, Almsford, The Fulwiths, etc., making those areas considerably less appealing for developers.

5. In this case there would be a need for further road junctions. The only access would be onto the A61, an already congested road. Slow-moving vehicles and animals would cause traffic back-up into Harrogate, not only just from base of Almsford Bank but also from Pannal.

6. To our knowledge, no assessment has been done by HBC of extending the existing traveller and gypsy site at Thistle Hill. A cost-benefit and sustainability analysis of the two options would clearly favour Thistle Hill.

Pannal Area Housing Development History:

Over the past forty to fifty years, the villages of Pannal and Burn Bridge have experienced extensive and sustained housing developments (Westminster Drive, Rosedale, Crimple Meadows, Hillside Road, Walton Park, Hazel Drive and Clark Beck Close) and this is still being continued with the redevelopment of the Dunlopillo Site (+120 houses) – **PN15**. The Parish Council does not believe that any other villages in the Harrogate district have been subjected to such a high level of sustained housing developments. Pannal has now grown to become a large village and is in great danger of losing its character and being swallowed up by Harrogate. We look to HBC to concentrate on housing developments in other areas. The residents of Pannal have made it clear that they do not want to become a suburb of Harrogate.

The Community Vision: Pannal and Burn Bridge:

There is considerable support from within both communities for opposing any more major developments in the Pannal and Burn Bridge areas (*reference the Pannal Area Community-Led Plan 2015*). As with many villages around the town of Harrogate, Pannal and Burn Bridge is currently surrounded by green open space, either Green Belt or SLA, which means a rural landscape of character. The residents seek protection for the intrinsic beauty of the area which contributes significantly to the appeal of the Harrogate district.

The landscape around Pannal and Burn Bridge, which is home to part of the Harrogate Ringway Footpath, provides a benefit to the economic, environmental, and social wellbeing of the district and therefore it should be protected from development. The appeal of the 'Ringway footpath' in the Pannal area would be lost if walkers had to walk through a housing development. Also, the character of the 'Crimple Valley' in the Pannal area would also be lost'. ***NB: under Policy NE4 The Crimple Valley is listed as 'a Special Landscape Area'.***

A Public Appeal for a Dispensation for Policies Map PN14 & PN16:

Harrogate Council will be aware that as from April 2016 Pannal and Burn Bridge now has its own Parish Council (P&BB-PC). The Parish Council inherited a Pannal Area Community-Led Plan which was produced by the Pannal Village Society in 2015. The community was consulted (*a fantastic 48% response rate*) and the plan contains the community's views on how the area should develop in the years ahead.

The Parish Council has already had discussions with HBC's James Langler (Planning and Development) with regards to establishing a Neighbourhood Plan, as requested by the community, and as based on the Community Led Plan – BUT – while work has commenced it is a task which will probably take at least two years to complete. **Thus, Pannal & Burn Bridge Parish Council, on behalf of the communities of Pannal and Burn Bridge formally request that HBC exclude PN14 & PN16 from consideration as a development site, now, to allow the P&BB-PC sufficient time to prepare a Neighbourhood Plan.**

Summary of: The Pannal Area Community-Led Plan 2015 – Action Plan:

The main requests outlined in the plan are summarised as follows:

- **Planning and Development: Housing:** preserving the village's rural setting, their separation from Harrogate, the Green-Belt and limiting any future development. This section also asks for the establishment of a Neighbourhood Plan once a Parish Council has been created.
- **Park and stride facility for Pannal Primary School.**
- **Request for a cycle path.**
- **The preservation of sites and features of natural beauty and potential scientific interest.**
- **The establishment of allotments, including an allotment for the Village Primary School.**
- **An all-weather football pitch.**
- **Tennis Courts.**

Most of the requests listed above will need open space and at least some of the fields included in **Policies Map PN14 & PN16** would be the first, and in many cases, the only choice.

Closing Comments:

Pannal and Burn Bridge Parish Council (P&BB-PC) firmly believes that it has presented a powerful case for HBC to allow the Parish Council and the communities of Pannal and Burn Bridge sufficient time to complete a Neighbourhood Plan before they consider the inclusion of development site PN14 & PN16 (to which we object anyway as detailed in the Emerging Harrogate Local Plan).

When considering our petition for a Parish Council in 2014, Harrogate Borough Council fully supported the establishment of the P&BB-PC. We ask that the Council allows P&BB-PC adequate time to “develop a shared vision and shape the development and growth of their local area” (*reference: Department of Communities and Local Government – Planning Practice Guidance and NPPF paragraph 16*). Even though the P&BB-PC Neighbourhood Plan is likely to take up-to two years to complete P&BB-PC refers Harrogate Borough Council to paragraph 216 of the NPPF: **“an emerging neighbourhood plan may be a material consideration”** and we ask Harrogate Borough Council to support P&BB-PC and the communities of Pannal and Burn Bridge, by omitting site PN14 & PN16 from the emerging Local Plan for the period 2018-2035, or at least until the Pannal and Burn Bridge Neighbourhood Plan has been submitted to Harrogate Borough Council.

We believe firmly that besides the options mentioned already in objections to PN14 para 6 page 3 within Pannal and Burn bridge that there are far more viable options open to Harrogate Borough Council to reconsider – namely ALL three sites in the Draft Plan: -

- FX4 Flaxby South site west of the A1M (employment)
- Green Hammerton GH2 (46 houses, GH3 35 houses, GH12 3703 houses)
- Cattal, CA1 (5 houses) CA4 (732 houses) & 3500 square metres employment land.

We look forward to receiving a positive response.

Yours faithfully,

Howard West

Chairman, Pannal and Burn Bridge Parish Council

List of Appendices

1. P & BB PC Memorandum (Face & Reverse) Oct 16
2. The HAPARA (Harlow & Pannal Ash Residents Association) comments on traffic impacts to Pannal & Burnbridge & comments from Beckwithshaw & North Rigton Parish Councils Dec 16
3. Planning Refusal Application No 6.152.19 OUTMAJ Berkeley De Vere for Rossett Green Lane dated 22nd Nov 16 re SLA intrusion
4. Extract from Environment Agency Site re Flood Risk map for Crimple Valley PN14 west and examples of recent flooding in the Crimple Valley /Pannal Village
5. Highlighted GS3 extract from 2016 Harrogate Development Plan re contraventions re Development Limits criteria
6. The ORS/PBA report on Traveller Settlements March 2013
7. Resident's research on HBC's Traveller policy in relation to PN16 Nov 16
8. The Community Led Action plan 2015 link.

Appendix 1. The Leaflet to all residents in the Parish.

PANNAL & BURN BRIDGE Parish Council Memorandum

This memorandum is being circulated to ALL Households in the Parish to ensure the implications of the recently issued Draft Local Plan by Harrogate Borough Council(HBC) are understood fully.

Once adopted as policy, the Plan will be used to determine future planning applications and there will be no further opportunity to challenge this after the consultation period.

We need replies from parishioners so that the parish council can prove it is providing its collective response on behalf of the parish. It is essential you then make **your** formal comments to HBC on their website <http://consult.harrogate.gov.uk/portal> once the consultation period begins on November 11. Although you cannot comment before that date, make sure you **register** on their portal now. For those without a computer, you may also send a written reply to HBC.

The map on the back of this leaflet shows the areas designated as proposed sites for development in HBC's draft Local Plan issued on October 25, 2016.

More detailed information along with the map appears on our website www.pannalburnbridge-pc.gov.uk. We will advise later on the formal consultation process on our website and Facebook. This is probably the most significant opportunity we have to shape the future of our parish.

Please use this leaflet plus any additional paper for your reply. Whether you are fervently against any/all of the proposals or agree with some/all of them, we really need to know.

Please give your email contact details so that we save YOUR money in future. With email, contacting you costs NOTHING and is immediate. Any printed communication costs hard cash which the parish can ill-afford. For those without email, we will continue with paper copies. Please send your response in the attached FREEPOST envelope to arrive **no later than Friday 25 November**.

Howard West, Chairman

Name(s): _____
 Address: _____
 Telephone Home: _____ Mobile: _____
 Email: _____

Site **PN14** on both sides of Leeds Road is proposed with a yield of over 200 houses and the adjacent **PN16** site is a proposed gypsy & travellers site with access off Leeds Road. Such developments would effectively join Pannal to Harrogate. *Please tick the relevant boxes if you object to these proposals:*

PN14 **PN16**

Your comments: _____

Please indicate if you are prepared to help the Parish Council during the consultation process.
 (e.g. by delivering leaflets; helping people to register and comment; statistical analysis)

Appendix 2. The HAPARA traffic survey

A section of the HAPARA research paper into traffic density and likely increased flow resulting from further development in the area to the South West of Harrogate is shown below. This will have an effect on the Pannal and Burn Bridge Parish and its through routes.

LOCAL PLAN COMMENTS – TRAFFIC ISSUES

TRAFFIC GENERATION

In the Model, the amount of traffic generated from new housing developments is at the very low end of expectations.

- Consultant’s calculations (model): 14000 houses generates 8100 vehicles in the peak hour¹
- Based on historic trip rate data² (my calculation): 9500 (17% increase)

You would expect edge of town developments to have higher proportion of total trip rates being made by car. That is because alternative modes of travel (public transport, cycle, walk) are more limited or unattractive.

In the peak hour, the number of trips generated by 2600 houses will be between 1500 and 1700 vehicles/hr. This compares with the current peak hour flow on Otley Road of around 900 vehicles/hr. (both 2-way)

IMPACT ON ROADS

Jacob’s Transport Model says³ that:

“The greatest effect on traffic flows is exhibited to the south-west of Harrogate on Lady Lane.”

And “a significant increase in traffic to the south-west of Harrogate which continues beyond Lady Lane to include Beckwith Head Road and the B6162 between Beckwith Head Road and Harlow Moor Road.”

And “Within Harrogate a number of developments are located in South West Harrogate. As a result there is a significant increase in traffic heading southbound on Crag Lane as well as on Beckwith Head Road and westbound on the B6162 extending from the Beckwith Head Road junction to Harlow Moor Road.”

And⁴ “the development sites coming forward in Pannal Ash result in congestion on the B6162 Otley Road/Crag Lane/Beckwith Head junction.”

The diagrams⁵ show significant increases in traffic

- On Otley Road down to Harlow Moor Road and beyond
- On Lady Lane / Whinney Lane / Pannal Ash Road
- On Hill Top Road / Burn Bridge
- On Yew Tree Lane / Burn Bridge

This raises all sorts of questions about the capacity of the network south of Cardale Park, not least the notorious Burn Bridge Road / A61 junction. None of these have been addressed.

¹ Based on trip rate 0.58 (average am and pm combined 2-way). See Jacobs table 5.2

² Trip rate 0.68, average of 13 recent sites (Transport Assessment documents). *Trip rates comparison.xlsx*

³ Jacobs: Harrogate District Transport Model, Local Plan Testing; pages 43 and 44

⁴ *ibid*, page 62

⁵ Jacobs: Harrogate District Transport Model, Local Plan Testing, figures 6-5 et seq.

CRITICAL JUNCTIONS

Out of all the junctions currently at or near capacity in the South West of Harrogate, only one junction has been identified in the Transport Model report as requiring improvement - Otley Road/Crag Lane/Beckwith Head Road. No analysis has been carried out at:

- Otley Road / Beckwith Knowle
- Otley Road / Beckwith Road
- Otley Road / Harlow Moor Road
- Otley Road / Pannal Ash Road
- Otley Road / Cold Bath Road
- Otley Road / Leeds Road (roundabout)
- Lady Lane / Beckwith Head Road
- Whinney Lane / Pannal Ash Road (roundabout)

Despite six of these being identified with significantly increased traffic flows under the different scenarios tested⁶.

PROPOSED HIGHWAY IMPROVEMENTS

Apart from some localised widening at Otley Road / Crag Lane, no highway improvements are proposed other than minor amendments to traffic signals.

BYPASS OPTIONS

The Infrastructure Capacity Report⁷ confirms that NYCC is

“looking at options for a relief road for Harrogate .. likely to be within the next Local Plan period. NYCC’s Strategic Transport Prospectus identifies a relief road for Harrogate as a strategic priority, but NYCC also recognises that in order to address congestion levels, a relief road on its own is not the solution. Alongside a relief road, a package of complimentary sustainable transport measures will also be required. This will likely include improving passenger transport facilities, providing improved cycling and pedestrian links and exploring opportunities for park and ride.

So where are the “complimentary sustainable transport measures” in the South West sector?

It then goes on to say: “The traffic model work undertaken to assess impacts of Local Plan growth and necessary mitigation does not require a relief road.”

So why do NYCC think a relief road is a “strategic priority”?

So far as developments in the SW of Harrogate are concerned:

- Northern relief road options have little effect
- Western bypass options would reduce traffic through Pannal, Burn Bridge, Beckwithshaw and North Rigton, but would have limited effect on traffic levels on the Otley Road corridor into town. Much would depend on the location of junctions.

The main focus of NYCC’s work appears to be on the northern relief road. That is the only one mentioned in their Strategic Transport Prospectus⁸ as it is part of their east-west improvement strategy. If that is so, then NYCC ought to carry out a quick *initial appraisal of*

⁶ Jacobs: Harrogate District Transport Model, Local Plan Testing, figures 6-29 et seq.

⁷ Infrastructure Capacity Study – Draft Infrastructure Delivery Plan, Stage 3 Report, Oct 2016. Paras 6.4 and 6.5

⁸ NYCC. A Strategic Transport Prospectus for North Yorkshire, June 2015. Page 26

the western bypass in order to rule it in or out before the end of 2017 – which is when they hope to identify preferred alignments.

NYCC's timeframe interweaves with the Local Plan timescale and you would expect some interaction between the two. No evidence that I can see.

PUBLIC TRANSPORT

Policy TI1 relates to the promotion of sustainable transport and the document says⁹ “The need for new homes and jobs is being met as far as possible in those settlements which are *well related to the Key Public Transport Corridor*. This includes the Key Bus Service Corridor and the Leeds Harrogate Railway.”

The Infrastructure Delivery Plan says¹⁰ “Providing a high level of public transport accessibility to any large housing site should be a pre-requisite”. It then goes on to say¹¹: “For Harrogate the bus network to the west of the town is dense enough to support services diverting to serve new allocated sites and/or passing them on the major bus routes”. It is difficult to understand the last point.

By contrast, bus service 6 which serves the Otley Road/Pannal Ash/Beckwith Knowle corridor is:

- not a “Key Bus Service Corridor” (logically – but no definition found)
- well short of providing a “high level of public transport accessibility”.
- unlikely to expand to the level required without substantial intervention.

There are short term plans for improvements to the rail service and longer term plans (unconfirmed), but these are not relevant to developments to the South West of Harrogate, which have no access to the rail network, except by car.

In summary, development in the SW of Harrogate fails to meet the requirements of draft policy TI1.

UNCERTAINTY

Considering the enormous uncertainty about the future course of the economy, investment in infrastructure, transport developments, patterns of working, etc., it is surprising that no consideration has been given to how this may be accommodated in the 20-year Plan. The words “uncertain” and “uncertainty” do not appear once in the whole document.

While “risk” is acknowledged in relation to the deliverability of sites (hence an overprovision of sites in the Plan) – and in relation to flooding – no flexibility is allowed for in the level of traffic impact and the ability of the infrastructure to cope.

Uncertainty in traffic terms arises from:

- Predictions of future growth
- Changes in work patterns
- Changes to public transport availability
- Future transport investment decisions
- Impact of congestion on route choices

⁹ Section 6, paragraph 6.5

¹⁰ Infrastructure Capacity Study – Development Options, Stage 2 Report, July 2016, paragraph 6.48

¹¹ Infrastructure Capacity Study – Draft Infrastructure Delivery Plan, Stage 3 Report, Oct 2016. Paragraph 6.12

- Advances in car technology, including driverless cars
- Changes in social patterns, school journeys, other peak hour activities.

The Department of Transport¹² says – in relation to forecasting - that “a range of sensitivity tests and/or alternative scenarios [should] also be developed to account for future uncertainty.” This should take account of both national and local factors. There is no evidence that any such tests have been carried out with the Harrogate District Transport Model.

There must be considerable doubt that the current transport infrastructure has sufficient resilience to cope if the forecasts are wrong. The network is too close to capacity. To reduce the risk to the local economy of excessive congestion, the Plan should say how more “flexibility” could be built in so that the levels of development proposed can be sustained. A Risk Assessment is needed.

One thing is certain: that forecasts are always wrong!

Appendix 3. Refusal for development at Rossett Green Lane

The refusal of the application of a considerably smaller development at Rossett Green Lane has been based on criteria which are directly applicable to the proposals for PN14.

The Planning Officer’s reasons for refusal are copied below for reference and the Parish Council can see no reason why these criteria should not be applied to the PN 14 (and PN 16) development plans.

¹² TAG Unit 3.15.5 The Treatment of Uncertainty in Model Forecasting
Page 11 of 17

RECOMMENDATION

That the application be REFUSED. Reason(s) for refusal:-

- 1 The proposed development of this site, particularly the southern part, will have an adverse impact on the existing landscape character of this Special Landscape Area and lead to an erosion of the rural character of this part of the southern edge of Harrogate, and in visual impact terms result in substantial adverse effects which could not be effectively mitigated. The proposal would also have an adverse impact on the character and recreational value of the existing Public Right of Way that crosses the site. It has also not been proven that the site could be developed efficiently without harm being caused to existing trees and hedgerows on the site which would result in harm to the existing landscape character. As such the proposal would not represent sustainable development. The proposal would be contrary to the requirements of Policies HD13, HD20, R11, C2 and C9 of the Harrogate Local Plan 2001 (as altered, 2004), Policies SG4 and EQ2 of the Harrogate Core Strategy 2009 and Policies and Guidance with the National Planning Policy Framework.

CASE OFFICER: Mr Graham Brookfield

Page 13 of 13
16/02825/OUTMAJ
6.152.19.OUTMAJ

Appendix 4. Flooding in Pannal and Burn Bridge

The developments proposed for much of PN14 are on a recognised flood plan – this is well known and the EA has documented the flood risk area. Pannal and the course of Crimple Beck (technically a river) have been prone to flooding – usually when man-made activity has interfered with the natural flows of run-off water and rainfall. Any activity taking place on PN14 to the West of the A61 is likely to exacerbate the effects of flooding, especially up river. The pictures below illustrate what can happen and the flooding at Christmas 2015 is a recent example. The map is taken from the Environment Agency’s website.

Appendix 5. Contravention of GS3 criteria.

The draft GS3 document is displayed below to reinforce our contention that the plans contravene a number, if not all, of the GS3 criteria A to F. Our comments are as follows:

- Three, at least, if not four, of the criteria will be contravened.
- (C and D) as listed in GS3 would not be fully met - i.e. there would be near coalescence with Harrogate, and there would be adverse impact on the surrounding SLA as has been proven in the recent decision to refuse the Rossett Green Lane application. If 22 houses have an adverse impact, surely 200 houses would!
- And the core shape of the Village would be affected for ever – arguably with a ribbon development between Harrogate into Pannal (E and F) with linear access off the A61 being the only option.

Extract from Harrogate District Plan - GS3: Development Limits
Draft Policy GS3

GS3: Development Limits

Development limits have been drawn around those settlements listed in policy GS2: Growth Strategy to 2035, and as shown on the Policies Map. Within development limits, proposals for new development will be supported provided it accords with other policies in the Local Plan.

Proposals for new development on sites outside the development limit of a settlement will be supported where it is consistent with the role of the settlement in the growth hierarchy set out in policy GS2: Growth Strategy to 2035, does not result in a disproportionate level of development compared to the existing settlement and meets the following criteria:

- A. The site is immediately adjacent to the existing built form of the settlement and would represent a logical extension to the built up area;
- B. There is either no suitable and available site for the proposed use within the settlement development limit or site allocated under policies DM1: Housing Allocations, DM2: Employment Allocations and DM3: Mixed Use Allocations;
- C. It would not result in coalescence with an adjoining settlement;
- D. It would not have an adverse impact on the character and appearance of the surrounding countryside;
- E. The proposal is of a scale and nature that is in keeping with the core shape and form of the settlement and will not adversely harm its character and appearance; and
- F. It would not extend existing linear features of the settlement or result in ribbon development.

In settlements where there is an allocation(s), development proposals on sites outside the development limit and for the same proposed use, will not be supported in advance of the development of that allocation(s) unless it can be demonstrated that the allocation will not come forward within the plan period or, in the case of housing, there is no five year supply of housing land.

In settlements within the Green Belt, proposals for new development will be limited to infill sites within the development limit and the redevelopment of brownfield sites where the openness of the Green Belt or the purposes of including land in the Green Belt is not harmed.

Appendix 6. The ORS report on Traveller Settlements.

The ORS report “HARROGATE BOROUGH COUNCIL TRAVELLER HOUSING NEEDS SURVEY” produced in March 2013 can be seen on this link on the Borough Council’s website:

https://www.harrogate.gov.uk/downloads/file/282/gypsy_and_traveller_housing_needs_survey_2013

Of particular relevance is the following extract (page 29 – “Broad Locations”) in which the final paragraph of the extract (“6.7”) states that: “should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community”.

PN16 clearly does not respect the interests of the “settled community”.

6. Broad Locations

Introduction

- 6.1 The study has investigated the potential for the identification of broad locations which will be a guide for the subsequent identification of specific sites.
- 6.2 Criteria for defining broad locations have been developed taking account of national policy, guidance, the results of the needs assessment and identified physical constraints. Broad locations have then been defined taking account of these key criteria.
- 6.3 The work has been informed by stakeholder interviews set out in section 4 above and a stakeholder workshop held on 16 January 2013. Stakeholders included Council representatives, Gypsy and Traveller support services, planning agents and representatives from the travelling communities from the Selby and Harrogate area.

Policy background for determining locational criteria

National policy

- 6.4 National planning policy for Gypsies and Travellers is contained within Planning policy for traveller sites² (PPTS). This identifies three key criteria for identifying appropriate sites for delivery through the planning system. To be deliverable within five years or developable within years 6-15, sites should:
 - Be available - the site should be available now or there should be a reasonable prospect that the site is available at the point envisaged;
 - Be suitable – the site should be in a suitable location for development
 - Be achievable – there is a realistic or reasonable prospect that housing could be viably developed at the point envisaged.
- 6.5 Local planning authorities should identify sufficient deliverable sites to provide five years’ worth of sites against their locally set targets. For years 6-10 and, where possible, for years 11-15, they should identify a supply of specific developable sites or broad locations for growth.
- 6.6 National policy recommends that criteria should be developed to guide land allocations if there is identified need and if there is no identified need, to develop criteria-based policies to provide a basis for determining planning applications which may nevertheless come forward.
- 6.7 Criteria “should be fair and should facilitate the traditional and nomadic life of travelers while respecting the interests of the settled community” (PPTS, para. 10). Many previous studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward. This is one of the principal reasons why the Government is

² Planning policy for traveller sites, Communities and Local Government, March 2012

Appendix 7. Resident’s research on HBC’s Traveller policy

Extensive research has been carried out into the proposal to place a site on PN16 by one of the Parish's residents. The findings are summarised below:

In 2012 Opinion Research Services and Peter Brett Associates conducted a survey and report into the future provision of gypsy and traveller sites in the Harrogate area. According to the report the additional requirement based upon the existing population would be for an additional 7 plots (this means space for a single caravan plus car parking or work space) would be needed over the next 15 years in the Harrogate area. This is not a particularly large number and one cannot see any reason why it cannot be achieved by the gradual expansion of the existing two sites which, according to the report, are not presenting any existing reported problems or concerns.

An additional larger site like PN16 would not therefore be catering for the existing gypsy/traveller population but would be encouraging gypsies/travellers to move to Harrogate from elsewhere.

Harrogate Borough Council's Landscape Character assessment of Middle Crimple Valley lists as a key planning objection maintaining the physical separation of Harrogate and Pannal urban areas. The boundary for the current Green Belt as it stands in Crimple Valley is the railway line therefore meaning that there only the most southern part of the valley is protected. However, there is no qualitative difference between the land to the south and the north side of the railway to justify this boundary other than that it represents a convenient location for it to be placed.

In accordance with the National Planning Policy Framework and Circular 06/2005 travellers' sites in Green Belt areas are an inappropriate development except where 'exceptional circumstances' can be shown. In this particular case, there is no material difference between Green Belt and SLA. I believe we should push the case that the Council should be required to prove these 'exceptional circumstances' if they want to proceed with the consultation for this particular development. In addition, a site listed as H8 at the south side of the Almsford Area which would be approximately 2/300 metres north of the proposed development was noted that it would have 'an adverse impact upon the character of the area' and also that it was at risk of flooding. I believe therefore that these two grounds which have already been accepted in relation to this area are valuable in presenting the case against this development. Significant points to note are:

1. The proposed location PN16 is unsuitable as it is in a SLA and would be detrimental to the approach to Harrogate from the south.
2. National requirements to provide traveller sites can adequately be met without the development of this site.

Appendix 8. The Community Led Action plan 2015

Extract from the Action Plan, pages 15 and 16, which show overwhelming support for the preservation of the special nature of the village and its surrounding area and preservation of the SLA. The full action plan can be found on the Parish Council's website at

<http://www.pannalandburnbridge-pc.gov.uk/UserFiles/Files/Documents/Community-led%20Plan.pdf>

ENVIRONMENT, HOUSING AND DEVELOPMENT

There was overwhelming support for preserving Green Belt and SLA (Special Landscape Area) status land surrounding the Pannal Area:

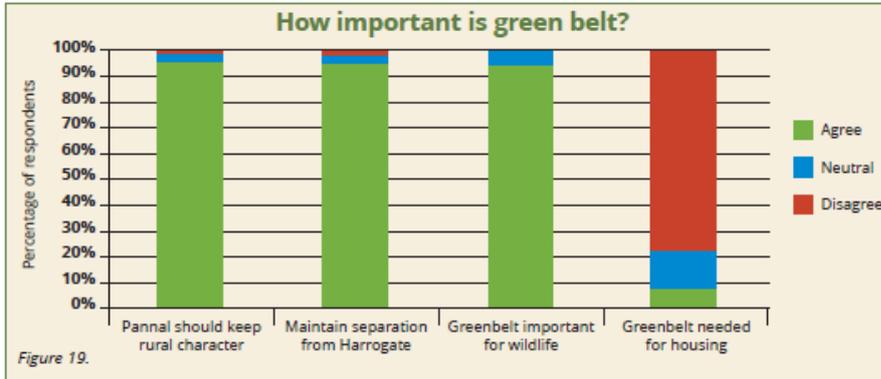
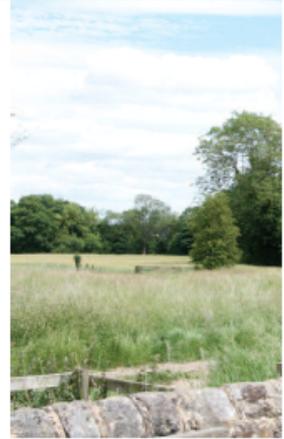


Figure 19.



When asked whether new housing development was needed:



Figure 20.

“What I like about living here: being a village community close to yet separate from Harrogate.”