Harrogate District Council
Local Plan Publication Draft
Consultation
HAG comments on behalf of the community
So you thought it was all over?
Local Plan History

• The council withdrew the draft Local Plan in 2014 (Grange Park - HM1)
• Had to start process again – housing need and sites – ‘SHELAA’ (Brookfield Garth - HM7)
• Consulted on draft Plan and decided more housing needed
• ‘HEDNA’ published – Additional Sites Consultation (Birstwith Road - HM9)
• Draft Plan to Full Council – Publication Draft
• But also planning applications!
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Publication Draft of the Local Plan Consultation

- Opportunity to comment
- *Is the Local Plan legally compliant and sound?*
- Complicated to respond
- Planning Inspectorate: “*groups should represent individuals with similar comments*”
- Comments to the council - now
- Public Examination – later this year
Legally Compliant?

“whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal”
Sound?

- **Positively prepared**: meets housing need and other development, including infrastructure and business development.
- **Justified**: based on evidence, the most appropriate strategy for the district when considered against other reasonable alternatives.
- **Effective**: should be deliverable and housing capable of being carried out.
- **Consistent with national policy**: enable sustainable development and be consistent with the National Planning Policy Framework.
Procedural Practice in the Examination of Local Plans

PINS: “The Inspector will work proactively with the Local Planning Authority. Underpinning this is an expectation that issues that are not critical to the plan’s soundness or other legal requirements do not cause unnecessary delay to the examination of the plan”
So is it us against the establishment? - Not quite - we just need one accurate shot ...

Comments should be effective:

• Non-compliance with legal requirements.
• Identify mistakes
• Is anything not based on evidence?
• A flawed process?
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Issues

Housing Growth Strategy
Primary Service Villages
Housing Numbers
Housing site allocations
Environmental effects

Alternatives
Public transport corridors
Economic uplift
Infrastructure capacity
Cumulative Impacts
Sustainable Development
What do we want to achieve?

1 - Get HM7 and HM9 housing allocations deleted from the Local Plan

   but to achieve this we also have to

2 - Challenge the legal status of the Local Plan and get the LPA to reconsider their approach

We will do this by making 11 comments
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Comments

<table>
<thead>
<tr>
<th>The SEA Directive and Alternatives.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The SEA Directive and Cumulative Impact</td>
</tr>
<tr>
<td>Infrastructure Delivery Plan</td>
</tr>
<tr>
<td>Vision and Objectives</td>
</tr>
<tr>
<td>Key Diagram</td>
</tr>
<tr>
<td>HEDNA</td>
</tr>
<tr>
<td>Growth Strategy</td>
</tr>
<tr>
<td>Development Limits</td>
</tr>
<tr>
<td>Housing Allocation HM7</td>
</tr>
<tr>
<td>Housing Allocation HM9</td>
</tr>
<tr>
<td>Phasing and Delivery</td>
</tr>
</tbody>
</table>
Sustainability appraisal and the SEA Directive - Alternatives

- Legal requirement to assess Plan alternatives at early stage
- Assessed strategic public transport corridors and specifically excluded ours
- Council then added ours into the Growth Strategy as a key corridor
- Part of the Growth Strategy to concentrate new houses - Hampsthwaite
- Failure to comply - so not legally compliant
### Strategy 10: Concentrate growth in strategic public transport corridors (Harrogate rail line and strategic bus routes)

#### Summary

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</tbody>
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Sustainability appraisal and the SEA Directive – Cumulative Impact

- Legal requirement to assess environmental effects during preparation of Plan
- Includes cumulative impacts
- Council say they did this for main settlements but not done at a village level
- Hampsthwaite: HM1, HM7, HM9 and other sites
- Infrastructure and environmental capacity
- Failure to comply - so not legally compliant
Infrastructure Delivery Plan

• “The new Local Plan is not just about homes and jobs; it will also look to facilitate new infrastructure provision to ensure that development is sustainable”

• “infrastructure and development policies should be planned at the same time, in the Local Plan”

• Only a draft and incomplete Infrastructure Delivery Plan currently available

• Does not identify all Local Plan infrastructure needs

• Plan is not sound

• Could have identified cumulative impacts at village level
Vision and Objectives

• “New development in ... a wider number of villages has helped to retain essential services in rural areas...”

• Where is the evidence to support this vision?

• Disproportionate growth could have opposite effect

• Harrogate-wide vision may not apply to villages

• Plan not sound
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Key Diagram

strategic or key public transport corridor?

Growth Option 10 - Strategic Corridor  Growth Strategy – Key Diagram
Objective: undermine the evidence for the housing growth numbers so less sites are required.

This could mean no allocations in Hampsthwaite...

Council wants lots of new housing to support economic growth

Applied an ‘economic uplift’

Must highlight weak assumptions and flawed predictions

Challenging for us but worth chipping away...
Growth Strategy Policy GS2

(1) New homes met “in settlements that are well related to the key public transport corridors”

We demonstrate SEA Directive not complied with

(2) “Scale of development will reflect the need to maintain and enhance services and facilities in rural villages”

(3) “allocations of land for new homes; with new village shops and businesses encouraged to support their continued sustainability”

We show there is disproportionate housing development and there is nothing to support economic objectives
Development Limits

• Policy in the Plan seeks to prevent “disproportionate level of development compared to existing settlement”.

We show allocations HM7 and HM9 ignore this policy:
410 houses in the year 2000 to 527 houses in 2017 -29%
HM7, HM9 and others – 60% since 2000
Rowden Lane and others – 84% since 2000
Heading towards a doubling of the village in a single generation!
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Housing Allocation HM7

- It is not too late. The site may not be developed.
- We apply the same SEA argument as before – Hampsthwaite should not have been selected for growth
- Site allocation not appropriate based on the environmental effects and cumulative impacts
- Infrastructure capacity issues: school, drainage
- Does not deliver sustainable development
Inconsistencies in the Additional Sites Consultation
• We apply the same SEA argument as before – Hampsthwaite should not have been selected for growth
• Site allocation not appropriate based on the environmental effects and cumulative impacts
• Infrastructure capacity issues: school, drainage
• Substantial environmental objections - AONB
• Does not deliver sustainable development
Phasing and Delivery

• It’s not 669 houses per annum – it’s 723 or even 765
• On-going 5 year housing supply issues
• All down to HEDNA and the council’s economic uplift

We argue:

1. Need a review of housing numbers now
2. Action to speed up the 6000 homes with permission but not being delivered
3. Policy required to bring 1500 empty properties into use
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This isn’t the end