**Objecting to the proposed allocations at Pannal in the Publication Draft of the Harrogate District Local Plan**

**Version 4**

**This is the interim version for the purposes of discussion at the Drop in day. An update verson will with more detailed advice will be posted on the PC website along with a range of other supporting documents and source documents. These will include:**

* **The updated reports from Arrowsmith Consultants**
* **The Traffic Survey (the interim report is available as a hard copy on the information table)**
* **The Landscape and Visual Impact Assessment (LVIA).**
* **Objections from other areas from which you can draw information for your response.**

**A reminder of the process**

Irrespective of the outcome of this Consultation Phase (in other words, whatever the Borough Council takes from the consultation responses), the Local Plan will be submitted to the Planning Inspectorate - possibly by the end of this year, if not in early in 2019. At this point, the Plan will be tested for “soundness”, principally against four measures or “tests” (we will refer to these in the left hand column in the response guide below):

1. **Positively prepared** –i.e. based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
2. **Justified** – i.e. the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. **Effective** – i.e. be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
4. **Consistent with national policy** –i.e. be consistent with the National Planning Policy Framework - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**Our Approach**

The plan and the allocations have not changed since the previous consultation. It is therefore **very important** to make comments again and even if you did participate in the previous consultations. This will ensure that they are put before the Council for this consultation now and will count with the Government Inspector for the subsequent examination.

However, it is now even more important to target comments at the specific areas where we feel the Plan can be criticised and where the Inspector will give weight to these comments.

We have suggested below areas in which this can be done and in the left hand column, we’ve shown the reference to the “Tests”. The “Response Subjects” below are in rough order of importance and strength of value in terms of objection.

We await three more reports:

* The Traffic and transport Study.
* The Landscape and Visual Impact Assessment Impact (LVIA).
* Our review of HBC’s demand for employment land (PN18).

These will follow in due course and we’ll add them to this response guide in addition to further matters as our research continues. Keep checking the website for the latest versions of this guide.

Nevertheless, the list below should give food for thought and pointers to areas where you may wish to do some of your own research prior to making your comments. Remember that there is a drop in session on 24th February in the Village Hall where we will be abler to take you though the process of objecting or commenting so that you can meet the deadline of 9th March for comments.

| **The 4 Tests** | **Response Subjects** |
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| **4** | **The Landscape and Visual Impact Assessment (LVIA)**We have commissioned the LVIA which we will present shortly. This will look not only at the Employment sites in the Special Landscape Area (SLA) but at the other two housing sites. The LVIA is likely to provide one of the strongest grounds for objection and should be taken alongside the other high subjects that offer strength to our arguments. |
| **4** | **Erosion of the Landscape gap – the Special Landscape Area (SLA) and Green Belt**The strongest case against the allocation of the sites is the erosion of the landscape gap between Pannal and Harrogate. Objections on these grounds are therefore advised, but note the comments on Green Belt and SLA below.* It is important to remember that although all three of the proposed allocations are within the SLA, unlike Green Belt (which is identified in national policy) this is a designation of HBC’s own creation. Their previous local plan set out its boundaries and it HBC can amend these when writing the new local plan to allow for site allocations. Therefore, saying that the sites are within SLA is not directly relevant to this consultation simply because it is HBC who decide where the SLA boundary is drawn.
* The relevant point to make is that the land between Pannal and Harrogate was considered “special” when the previous plan was produced and there is no justification for it being considered less special now.
* In addition, some may feel that a mention of the Green Belt is worthwhile. Why is HBC not considering suggesting a limited review of Green Belt boundaries to allow housing allocations within the current Green Belt across the whole district, but in locations which are less sensitive to landscape change such as the SLA in our Parish.
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| **4** | **Transport and Traffic Infrastructure**The transport impact of the allocations can also be criticised. There are several comments to be made here.* We await the detailed report from our traffic consultants. However, the initial report states: “Providing accesses to sites PN18 and PN19 from the A61 would further impact the road safety situation in proximity. Plans and decisions should take account of whether a “safe and suitable access to the site can be achieved for all people”. If safe access cannot be achieved from the A61, the allocation and development of PN18 and PN19 would be contrary to NPPF policies (paragraph 32).” Your local knowledge can comment on whether you feel that this suitable and safe access is achievable on the A61 near the Mercedes Garage and Crimple Hall.
* Comments can also emphasise the current state of affairs in the Parish and generally getting into and out of the town and commuting.
* Also worth commenting on is the congestion in Pannal towards the A61 lights whilst the Burn Bridge Road/A61 junctions is closed. This could be the “taste of things to come” with all the traffic trying to come down on of the two rat run routes. Link this to the additional 3000 + houses planned for the west of Harrogate and the resultant effect through Pannal and BB. See the HAPARA leaflet referred to below.
* Note also: NYCC’s Highways objected to the current planning application at Spring Lane for 512 houses stating “*there is a section on the east side of the site that is single track and I am very concerned about the increase in traffic flow due to the development*” (referring to the road past the Scout Hut. This can be cited as a demonstration of the impact of the allocation of 72 houses on PN17 the road infrastructure. The suggested solution by the developer is to make the road by the Scout Hut one way!!!! For more information on this correspondence contact the PC or the Spring Lane Group. The PC will be making this point in its submission.
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| **2** | **The numbers. As background, you might want to look at this (Harrogate District Local Plan: Housing Background Paper) link here:**<https://www.harrogate.gov.uk/downloads/file/3186/2018_january_housing_background_paper>The problem with contesting the numbers is that we have no hard and researched evidence with which to contest the evidence and findings. Producing such evidence to question the housing figures is a much longer task and has considerable costs well outside the current budgets that we have. However, it is worth addressing the numbers in your comments. We suggest the following approaches:* Querying the fact that the number of houses needed across the district increased by 20% between the assessments carried out in 2016 and 2017. Specifically, the consultants for HBC (GL Hearn) wrote one document issued in June 2016 stating that the council needed to build 11,697 houses in the next 20 years. A year later they wrote another document stating 14,049. We should question what happened in that year to warrant this 20% increase? The PC does **NOT** find satisfactory evidence in the GL Hearn and hence HBC studies to justify this increase. You may wish to investigate further and make this point.
* There seems little in these documents to address the capability of Harrogate and the surrounding areas to cope with this expansion. If just the Harrogate houses are built that's a 20% increase in the size of the town. That won't just cripple Harrogate, the extra traffic will destroy all the towns and villages you have to drive through to get anywhere. Link this point to the traffic guidance
* When considering the numbers as well as the related issues like traffic and lack of infrastructure, do look at the HAPARA Leaflet - <https://v6admin.visionict.com/Sites/231/_UserFiles/Files/HAPARA%20Leaflet.pdf> and available on the PC’s website. In this leaflet, you will be able to understand impact of the plans to the West and North of the Parish and how they’ll affect us. HAPARA point out that The Draft Local Plan includes sites for 16077 houses in the whole district, nearly 15% more than the calculated requirement of 14049.
* HBC Strategy does not address the issue of affordability which can only be dealt with if that housing remains permanently outside the open market.
* Residents may also wish to bring up the impact of the UK leaving the EU. Whilst the effects in the long term are an unknown factor it is likely to have some impact on the amount of housing required. Note that the second GL hear report only said "BREXIT changes nothing". You may wish to question that assertion and the link from the Economist (which features Harrogate as a case study) is here - <https://www.economist.com/news/britain/21736178-harrogates-downward-migration-trend-few-years-ahead-britains-how-it-faring> - might give you information to ponder and draw your own conclusions.
* You might wish to comment on a recent article in The Business Desk that reported on a Local Government Association study that a total of 28,597 homes across Yorkshire and the Humber have not been built despite planning permission being granted. We do not know how many of these are in Harrogate but the article is here: <http://www.thebusinessdesk.com/yorkshire/news/2017012-more-than-28000-homes-across-yorkshire-not-built-despite-receiving-planning-permission>.
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| **2 & 4** | **Employment Land need – PN18, the commercial development plans between the A61 and the Crimple Valley viaduct.**It is our view that employment land need is overestimated especially when the additional land is allocated in the SLA. We doubt whether anyone has weighed the need for increasing the land supply against the harm to the landscape. Our belief is that HBC are satisfied with the HEDNA authors’ views on need and that it would be beneficial to increase the employment land supply. We will question the employment figures used to justify the allocation of PN18; however the research into these is still being undertaken. We will report back once this is completed. |
| **2 & 4** | **Suggesting somewhere else. To look outside Pannal across the rest of the District, you should look at the Strategic Housing and Economic Land Availability Assessment (**SHELAA) document here: <https://www.harrogate.gov.uk/downloads/file/3197/2017_december_strategic_housing_and_economic_land_availability_assessment>If the required housing numbers produced by the HBC are correct, and there are overwhelming reasons that Pannal sites should not be developed, then those houses will have to be provided elsewhere. There is no reason why you cannot suggest alternative sites which would not have the same environmental landscape and infrastructure impacts as those at Pannal. You could include:* The TESCO site – why is this not considered? Note: the site does not seem to have been assessed by HBC for housing and is a brownfield site. HBC may say that when they produced the plan that site was likely to be developed as a supermarket. This is probably not the case as TESCO pulled out in early 2017
* Sites towards the A1 and A1(M). Green Hammerton/Cattal has been included in the current plan and the belief is that this will be included after this consultation despite objections. You can make the point that as this is now to be a new “settlement” all the infrastructure will be or is already in place (Motorway etc). If so, then build some more houses there where there is infrastructure.
* Additional sites such as Flaxby North (the former golf course) and the proposed but rejected new settlement between the old A1 and A1(M) north of Wetherby.
* The future likely availability of ex MoD site such as Dishforth – plenty of space, and access to the main trunk roads. Make the point that there is a stock of ex MoD married quarters empty in places like Ripon.
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|  | **Legal Compliance**In addition to the tests of “Soundness”, the Plan has to be legally compliant. In summary this means that it must be prepared in line with statutory regulations, it has a duty to have cooperate both internally (with local residents) and externally with other authorities; and has complied with other requirements such as sustainability appraisals.You may wish to comment on the following particular points:* Has the Council complied with its duty under the Self build and Custom Housebuilding Act 2015 - <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>?
* Under duty to cooperate, we believe that HBC has only carried out its Strategic Environmental assessment (SAE) for single sites rather than consider the cumulative effect t of the plan across the district.
* Whilst HBC has cooperated with Leeds City Region (LCR) they have ignored the fact that The LCR Strategic Plan 2016-2036 doesn’t identify Harrogate for housing growth. Leeds City actually reduced its need by 30% so why does Harrogate persist with such an unrealistic target? You may see comments about the Leeds City Region and the LCR strategic economic plan that does not identify Harrogate for additional housing. Unfortunately, we understand that this, even if it is the case, is a factor in deciding HBC’s plans. But you may wish to mention this in the context of neighbouring authorities sharing resources and land.
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|  | **Areas of objection you may decide to avoid*** **Compliance**. Having looked at the local plan regulations, the requirements are so wide ranging that the Consultants do not think that HBC have failed in any major way to comply with the regulations (even if the wording of some of the information they have put out leaves a lot to be desired). However, you may wish to challenge this under the “self build” heading in “Legal Compliance” above.
* **Disproportionate growth**. We have previously made representations under this heading. Whilst the representation is technically correct it should be remembered that there is no overriding planning principle that all settlements should have an equal share of growth. While the disproportionate growth argument has valid social implications it is best to put greater emphasis on the landscape value of the gap between Pannal and Harrogate, and resultant traffic and infrastructure matters.
* **Hydrology and flooding**. By all means mention flooding – as many of us have personal feelings and experiences about the flooding in the Parish, but be aware that the Hydrological Survey we produced as part of the PC’s representations in 2017 challenges the conventional (Environment Agency) analyses – it is the Environment Agency’s information which the Inspector is most likely to support.
* **Lack of consultation**. HBC not taking into account the comments in the previous consultations is not be a strong argument but you may wish to mention it anyway to illustrate the manner in which HBC has dealt with the residents.
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