



**ASSESSMENT OF HARROGATE BC EVIDENCE AND SUGGESTED BASIS FOR
OBJECTION TO THE ALLOCATION OF SITES PN17, 18 & 19**

FOR PANNAL AND BURN BRIDGE PARISH COUNCIL

**IN RELATION TO HARROGATE DISTRICT DRAFT LOCAL PLAN ADDITIONAL
SITES CONSULTATION**

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1. INTRODUCTION

- 1.1 This report has been commissioned by Pannal and Burn Bridge Parish Council. Its scope is limited by the ceiling agreed with the Parish Council in regard to fees, and therefore the time available to Arrowsmith Associates to carry out research into the Borough Council's evidence base and report accordingly.
- 1.2 Parish Councils who object to the contents of a Local Plan have an uphill task. In preparing a plan a local planning authority (LPA) should consider the needs of its area as a whole. Land has to be allocated to meet the needs of all its residents and businesses. This involves calculating the need for housing, employment and other land over a long period. The subsequent development inevitably entails the loss of habitats and views, the generation of traffic and demands on services. Since the effects cannot be avoided, the LPA has the task of balancing local gains and losses against the needs of the wider community. For this reason it is rarely sufficient to show that a development will cause harm. It is also necessary to show that development is not needed – which is difficult because it requires interrogating a mass of social and economic background data – or that the need can be met somewhere else with less harm – which is difficult because it involves considering all the alternative sites spread throughout the district. Few Parish Councils have the resources to carry out these wider analyses.
- 1.3 For the above reasons most Parish Councils concentrate on highlighting the harm caused by the proposals to which they object and then trust the LPA (or the Planning Inspector when there is a Local Plan Examination) to fairly weigh this harm against the other relevant considerations. Inspectors usually recommend only limited changes to a Local Plan once it gets to its examination. This is because a Local Plan is something like a building. Pull out too many bricks and it falls. This is exacerbated by the requirement for an Inspector to find a plan either sound or unsound. In general the best opportunity for changing a draft allocation is when it is first proposed because at that stage the Council have less of a commitment.

2. HARROGATE BC'S EVIDENCE BASE

- 2.1 There is a series of steps in the collection and evaluation data leading to the allocation of a site in a Local Plan. The first is the calculation of how much development land is needed in the District as a whole. The types of development relevant to sites PN17, PN18 and PN19 are housing and employment. The amount of land required is regularly updated and the calculations underpinning the additional sites now proposed are in the most recent of these, the July 2017 Housing and Economic Development Needs Assessment (HEDNA) prepared for the Council by GL Hearn.
- 2.2 The second step is found in the Draft Local Plan Growth Strategy published last year. As suggested by its name, this sets out the strategic approach that the Council intend to adopt within the Local Plan and its policies and allocations. The Strategy notes that settlements within, or located in close proximity to, the key public transport corridors have the best access to public transport and therefore to a wide range of jobs, services and facilities within the district but also further afield. It goes on to say that Harrogate, Knaresborough and Ripon are the district's main urban areas and over the plan period will accommodate most of the district's growth. In Harrogate and Knaresborough this will be accommodated primarily through the release of land on the edge of the settlement to deliver urban extensions. In addition, draft policy GS2 provides that there will be some land specifically identified for employment purposes outside the main settlement and that there will be one major new settlement. The current consultation now proposes that this new settlement should be in the Hammerton area.
- 2.3 The third step is the sustainability appraisal of individual sites. An explanation of the appraisal method is given in appendix 4 to the Council's Sustainability Appraisal of the Draft Local Plan published in October 2016 . The sustainability appraisal of the additional sites now proposed is found in the 2017 Sustainability Appraisal Addendum One produced as part of the current consultation. Essentially the appraisal is a tick-box exercise that draws partly on an ad-hoc analysis of each site and partly on background papers which are on the Council's web site.
- 2.4 The remainder of this report will examine the three steps described above in greater detail and identify what we consider to be weaknesses that could support the Parish Council's objection to sites PN17, PN18 and PN19.

3. JULY 2017 HOUSING AND ECONOMIC DEVELOPMENT NEEDS ASSESSMENT (HEDNA)

- 3.1 This report is the basis of the Council's view that it needs to allocate additional housing and employment sites. It is a long (199 pages) and technically detailed document.
- 3.2 The housing requirement figures in the report can be questioned but, as the report itself makes clear predicting housing requirement is an area of inevitable uncertainty. This may appear in itself to be justification for querying the Council's approach, but all LPAs are required to assess need and if a more accurate assessment cannot be produced in questioning that which the Council use, then this approach is unlikely to be successful.
- 3.3 The UK has a persistent record of building insufficient housing. Among other results this has led to inflated prices which in Harrogate District are a particular problem. Against this background, even though one could contest aspects of the housing requirement calculation, we do not think this would constitute an effective objection. The work required to do this is well beyond the scope of the time limits available to evaluate the calculation and for the Parish Council to formulate its response.
- 3.4 One option which may be available to the Parish Council at a later date is to question the three allocations on the basis of need for them in relation to future need assessments as the plan progresses.
- 3.5 The report's calculation of employment land requirement is a different matter and there is scope here for basing on objection on the assessment in relation to PN18.
- 3.6 In 2016 policy GS 1 of the then Draft Plan estimated that there was a requirement for 20-25 hectares (ha) of new employment land over the District as a whole. The HEDNA has now replaced this with an estimated requirement of 54.8ha. The HEDNA notes that there is 16ha of vacant land on existing employment sites, leaving a residual requirement of only 38.8ha. The current consultation refers to this as a 'minimum requirement', which it says needs to be increased to provide flexibility of choice and supply. In the light of this assessment the area of additional employment land added to the original 2016 allocation is 26.13ha (net) and 42.84ha (gross).
- 3.7 We have not been able to trace a figure for the total amount of new employment land allocated in the draft plan as now augmented by the additional allocations but, on the assumption that 22.5ha were allocated originally, the additional allocations now bring the total to between 44.5ha and 65.3ha compared with the residual requirement of 38.8ha. This is a significant increase.

- 3.8 It is important to consider how the HEDNA derived its 54.8 figure. It calculated the requirement in two ways. The first calculation was based on a labour demand projection. It resulted in a requirement for only 17.6ha. The HEDNA increased this to 28.2ha to give a margin for flexibility. The HEDNA then made an alternative calculation based on projecting development rates from 2006 to 2016. This gave a much higher figure of 49.8ha which is based on separate projections for employment in different use classes.
- 3.9 The HEDNA prefers the high requirement figure based on trend projections for employment in use classes B1c and B2 (the biggest consumer of land) on the basis that anticipated losses in manufacturing jobs (which partially explain the lower land requirement calculated from the labour demand projection) are compensated by changing industrial practices which require more space per worker. On the other hand, HEDNA prefers the higher requirement figure based on labour demand projection for employment in classes B1a and B1b. The argument is that commercial floorspace analysis and consultation suggest that the growth of this sector has been constrained in recent years by a lack of floorspace.
- 3.10 In order to calculate the total land requirement figure HEDNA then takes the higher figure based on trends for use classes B1c, B2, B8 and for Sui Generis uses (i.e. uses that do not fit into defined use classes). It again takes the higher figure, which in relation to these use classes, is based on labour demand projection, for employment in B1a and B1b. It should be borne in mind that the requirement for B1a and B1b uses already appears (on the basis of what is reported above) to include an uplift for flexibility, which is in addition to the subsequent uplift for flexibility which the Council have suggested in their draft allocation (as reported in paragraph 3.6 above). Flexibility has therefore been worked into the calculation twice and could be used to question the accuracy of the calculation.
- 3.11 This overall approach to employment land allocation suggests that constraining demand has not been a priority in employment land allocation. The approach might be defensible if over-allocation could be achieved without cost but in the case of site PN18 there are seriously harmful effects (as assessed by the Council in their Sustainability Appraisals and discussed under that heading below). That being the case, the over-allocation of employment sites in combination with the costs of developing PN18 constitute grounds for objecting to that site's allocation.
- 3.12 It is significant that a profligate approach to employment land allocation is not unusual in UK development planning. One can speculate on what effect the approach would have on house prices if applied to housing allocation where over-allocation is normally restricted to a 5% buffer or, in the case of persistent under delivery, 20% (paragraph 47 of the National Planning Policy Framework). We do not suggest that our clients draw attention to the discrepancy since the associated arguments are complex and in this instance do not assist their objection.

4. GROWTH STRATEGY

- 4.1 It is difficult to question the overall growth strategy as expressed in draft policy GS2 (see paragraph 2.2 above). It clearly makes sense to concentrate new development close to near to District's larger settlements and key public transport corridors where jobs and services are more accessible. Furthermore, the Council's intention to promote a major new settlement suggests that it cannot justifiably be accused of not considering radical alternatives. However, when one comes to consider individual allocations, the Borough Council offer no policy guidance other than the Sustainability Appraisals of individual sites. There is for example no indication of what percentage is implied by the intention to concentrate "most of the district's growth" in the main towns and city. There is no indication of what percentage should be accommodated in extensions to Harrogate as opposed to Knaresborough or Ripon or what percentage of the Harrogate related growth should be located to the north, south, east or west of the town. This throws all the emphasis onto the Sustainability Appraisals.
- 4.2 This lack of detailed focus within the strategic approach may be something that the Parish Council could use in future objection to the allocations, but the scope of the current consultation is solely to address additional draft allocations and so the criticisms of the growth strategy that we have identified are not relevant at this stage.

4. SUSTAINABILITY APPRAISALS

5.1 Each possible development site has been subjected to a sustainability appraisal. These appraisals are comprehensive. They cover sixteen criteria. These are:

1. Quality housing available to everyone
2. Conditions and services to engender good health
3. Safety and security for people and property
4. Vibrant communities that participate in decision making
5. Culture leisure and recreation facilities available to all
6. Local needs met locally (e.g. bus services, schools and shopping)
7. Education and training opportunities
8. Biodiversity and the natural environment
9. Minimal pollution levels
10. A transport network which maximises access and minimises detrimental impacts
11. Minimise greenhouse gas emissions & managed response to climate change
12. Prudent and efficient use of energy and natural resources
13. Protect and enhance the historic environment
14. A quality built environment and efficient land use patterns
15. Good quality employment opportunities available to all
16. Conditions for business success, economic growth and investment

5.2 We have three reservations about the appraisal method:

- There is huge scope for subjectivity. In some cases this is reduced by reference to supporting background studies (for example on transport, landscape, built and natural environment and flood risk) but for many this allows for criticism of the comments when necessary.

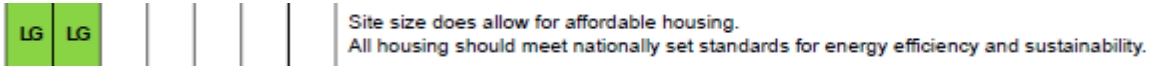
- Many of the criteria depend on the way a site is developed and do not depend on its location. Others depend on social factors, which are independent both of location and the way a site is developed. In both cases the criteria have limited use in evaluating different locations.
- Appraisals will vary from criterion to criterion and from site to site. Without a method of combining all the criteria (including any weighting of considerations) to produce an overall rating for each site there is no easy way to compare sites. The Council have no published method for combining criteria which allows the conclusions to be questioned.

5.3 Despite the reservations expressed above, the sustainability appraisals represent the best available method of commenting on the additional sites. In the next three sections of this report we comment of the appraisal for each of the three sites to which our clients wish to object. We do not consider it necessary to comment on all the individual ratings. We confine our comments to individual points of interest or disagreement and to overall assessment for each site.

6. SUSTAINABILITY APPRAISAL HOUSING ALLOCATION - SITE PN17

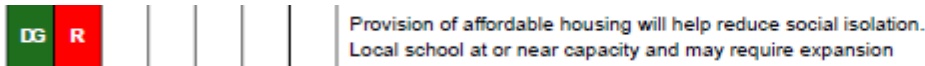
6.1 Analysis of the Council's appraisal

1. Quality Housing Available to Everyone



Any substantial site in any location would score well on this criterion.

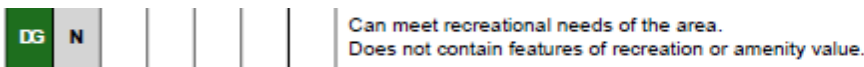
4. Vibrant Communities that Participate in Decision Making



Any substantial site in any location would score well on the reduction of social isolation.

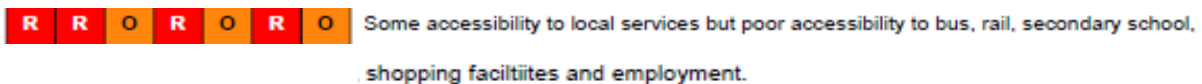
The need to extend the school is a real cost of this location, recognised by the allocation the Borough Council are having to make in that regard.

5. Culture, Recreation and Leisure Facilities Available to all



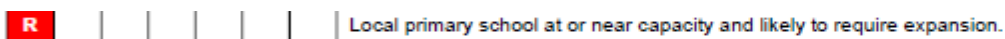
Any substantial site would score well by providing for recreational needs.

6. Local Needs met Locally




Appraisal correctly gives site a poor overall rating. It is assessment results such as this by the Council's own officers and professional consultees which should be focused on.

7. Education and Training Opportunities



Appraisal correctly gives site a poor rating.

8. Biodiversity and the natural environment



Some potential adverse effects on biodiversity but relatively easy to mitigate.
Need not result in loss of woodland/ trees.
The site is large enough to incorporate new natural green space and add to green infrastructure.
Environment Agency - impacts cannot be predicted at this stage.
High/ Medium landscape sensitivity.
Low landscape capacity to accommodate development proposed - mitigation opportunities limited.

Any substantial site in any location would score well on the provision of green space.


The poor landscape rating is a real and significant cost of this location.

Not only is the site designated as a Special Landscape Area (SLA) in the current Local Plan, but the Council's [2016 October Review of local landscape designations](#) suggests that the site should retain SLA status.

Again this is the Council's landscape officer giving an opinion which supports the objection and should be used as fully as possible.

The [Site assessment volume 11 - Nidd to Rainton](#) (2016) and [2017 Built and Natural Environment site assessments](#) contain fuller assessments on which these comments were based and should be utilised if possible along with the 2016 review of local landscape designations.

9. Minimal Pollution Levels

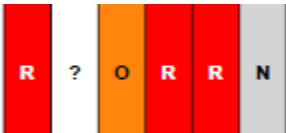


Yorkshire Water - impacts in relation to waste water and water infrastructure cannot be predicted at this stage.
Positive effects:
Unlikely to impact on air quality.
Negative effects:
Some adverse effect on surface water and watercourses - mitigation possible.
Loss of grade 3 agricultural land.

Most residential development is unlikely to impact on air quality.

Adverse effects on surface water and water courses are real costs but can be mitigated. The Parish Council's contact at the Environment Agency seems to be the best source of support on this issue and should be utilised if possible.

10. A transport network which maximises access and minimises detrimental impacts



Significant transport/and or accessibility/cumulative impact problems requiring substantial mitigation.
Increased public transport provision and extension of services cannot be predicted at this stage.
Poor connectivity to cycle routes.
Lack of pavements does not encourage pedestrian access to services.
Significant barrier to accessibility.

The poor rating reflects a real cost in transport terms and should be pursued in regard to Spring Lane even if it cannot be in relation to the other sites. In part this is informed by the result of the [2016 October Harrogate district transport model](#) which may reinforce the grounds for objection.

13. & 14. Protect and Enhance the Historic Environment & A Quality Built Environment

R								Likely to harm significance of heritage asset.
na	na	na	N	N	R	N		Negative impact on local distinctiveness.

The poor ratings here reflect a real costs.

16. Conditions for Business Success

LG								Provision of affordable housing as part of scheme encourages investment and local business expansion
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The site scores no better than any substantial site in any location would on this criterion.

OVERALL

The site scores poorly which suggests the allocation is not justified and an objection on the grounds indicated above would hold weight.

7. SUSTAINABILITY APPRAISAL OF EMPLOYMENT ALLOCATION PN18

7.1 Analysis of the Council's appraisal

6. Local Needs met Locally

Y O R R O Y Y Good accessibility to local services but poor accessibility to primary and secondary schools.

Less relevance to an employment site than to a housing site but nevertheless primarily a poor rating

7. Education and Training Opportunities

LG | | | | | Proposed for employment- may bring opportunities for apprenticeships and training.

Any employment allocation would score well on this criterion

8. Biodiversity and the natural environment

R DG DG LG ? R R Significant adverse effects on biodiversity.
 Need not involve loss of woodlands/trees and potential for significant woodland creation.
 The site is large enough to incorporate new natural green space and add to green infrastructure.
 Public right of way within or close to the site.
 Environment Agency - impacts cannot be predicted at this stage.
 Landscape sensitivity rating: high
 Landscape capacity: limited or no capacity to accommodate development or mitigate impacts.

Generally poor ratings reflecting real costs.

It should be noted that the site is designated as a Special Landscape Area in the current Local Plan. The Council's 2016 Review of Local Landscape Designations suggests that the site should retain SLA status

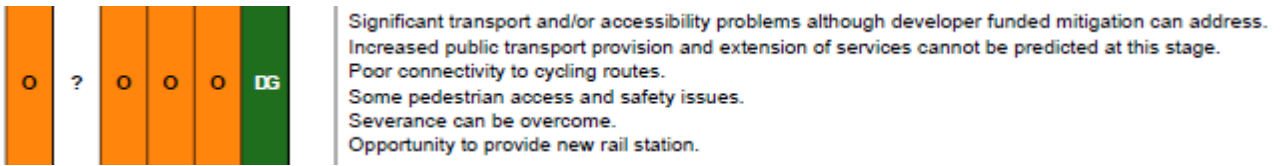
Once again the Council's landscape officer gives an opinion which supports the objection and should be used with the support of the relevant assessments in [Site assessment volume 11 - Nidd to Rainton](#) (2016) and [2017 Built and Natural Environment site assessments](#) and the [2016 October Review of local landscape designations](#).

9. Minimal Pollution Levels

N DG O ? R Y R Yorkshire Water - impacts in relation to waste water and water infrastructure cannot be predicted at this stage.
 Positive effects:
 Unlikely to have impact on air quality.
 Negative effects:
 Some adverse effect on surface water and watercourses - mitigation may not be possible.
 Loss of grade 3 agricultural land.
 A major road, the A61, lies close to the site.

Generally poor ratings reflect real costs. The aim must be to exploit these with whatever support can be obtained from contacts amongst the statutory consultees.

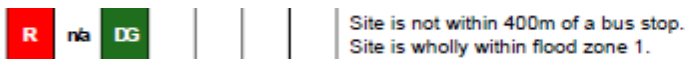
10. A transport network which maximises access and minimises detrimental impacts



Generally poor ratings reflect real costs. Opportunity to provide improvements to public transport may be no more than speculation. No evidence of a feasibility study.

The 2015/2016 Travel Model prepared for the Council by Jacobs Consultants did not take account of sites PN17, PN18 and PN19 because they were not included in the 2016 draft plan.

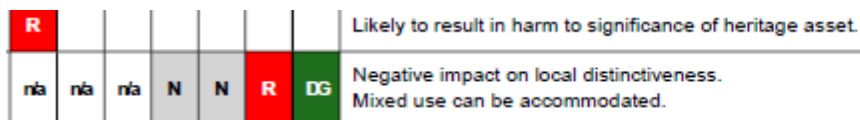
11. Greenhouse Gas and Climate Change



The fact that the site is not within a flood risk area is in reality the absence of a cost rather than a positive benefit.

The distance from public transport is a real cost. Despite the supposed benefits of Pannal as a sustainable location due to good public transport links, PN18 is not within 400m of either a bus stop or railway station.

13. & 14. Protect and Enhance the Historic Environment & A Quality Built Environment



The poor ratings here reflect real costs.

15. & 16. Good Quality Employment Opportunities & Conditions for Business Success

LG	?						Proposed for employment. Public transport provision cannot be predicted a this stage.
DG							Provision of employment land will encourage investment and support local business expansion.

Any substantial employment site in any location would score well on these criteria and they should surely be disregarded for assessing employment sites.

OVERALL

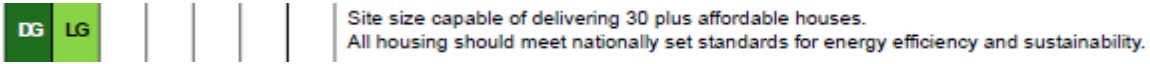
Adverse effects predominate for PN18. The positive effects identified would be experienced by any substantial employment site in any location. Appraisal again suggests the allocation is not justified, in particularly in relation to landscape.

7.2 There is the further consideration that the assessed requirement for new employment land has been increased from 20-25ha in the 2016 draft plan to 44.5ha or 65.3ha (depending on whether one uses net or gross figures for the additional sites added in the current consultation). As we have argued in section 3 above the Council’s approach, which entails potential over-allocation in the interests of flexibility, would be justifiable if the additional allocations did not have harmful effects. However, in the case of PN18 they clearly do.

8. SUSTAINABILITY APPRAISAL OF HOUSING ALLOCATION PN19

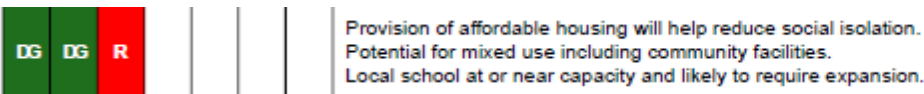
8.1 Analysis of the Council's appraisal

1. Quality Housing Available to Everyone



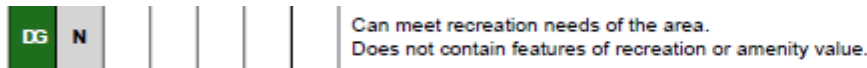
Any substantial site in any location would score well on this criterion.

4. Vibrant Communities that Participate in Decision Making



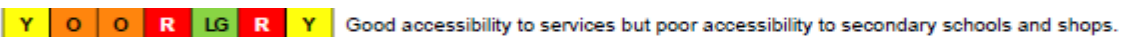
Any substantial site in any location would score well on the reduction of social isolation and the opportunity to include community facilities. Again the need to extend the school is a real cost of this location.

5. Culture, Recreation and Leisure Facilities Available to all



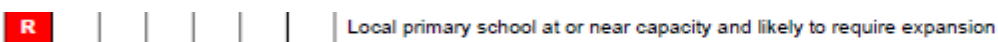
Any substantial site would score well by providing for recreational needs.

6. Local Needs met Locally



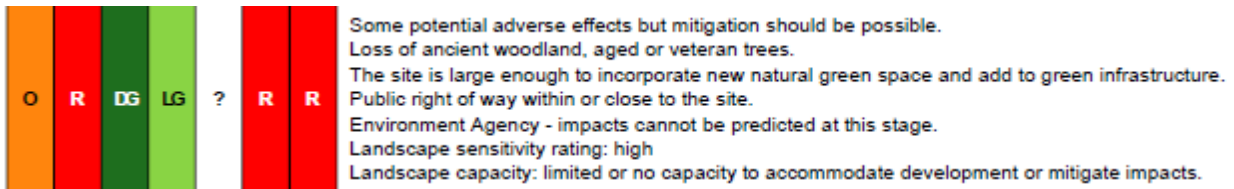
Appraisal correctly gives site a poor overall rating. This is an opportunity to comment effectively on service and infrastructure inadequacies.

7. Education and Training Opportunities



See comments above.

8. Biodiversity and the natural environment

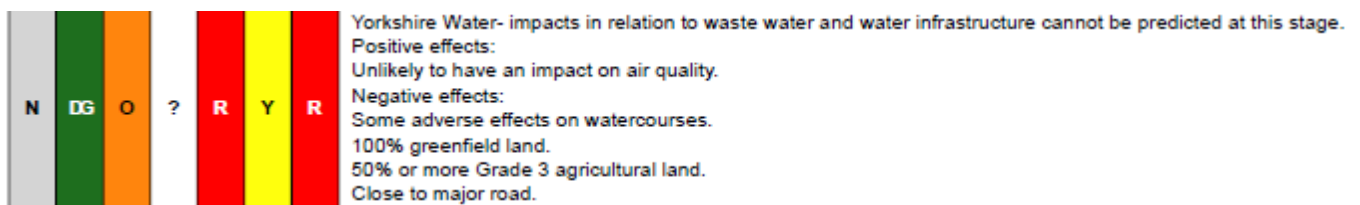


Any substantial site in any location would score well on the provision of green space.

The poor landscape rating is a real and significant cost of this location. It should be noted that the site is designated as a Special Landscape Area (SLA) in the current Local Plan. The Council's 2016 Review of Local Landscape Designations suggests that the site should retain SLA status.

The evidence base documents mentioned under this heading for the other sites provide further ground for objection to the allocation of PN19.

9. Minimal Pollution Levels



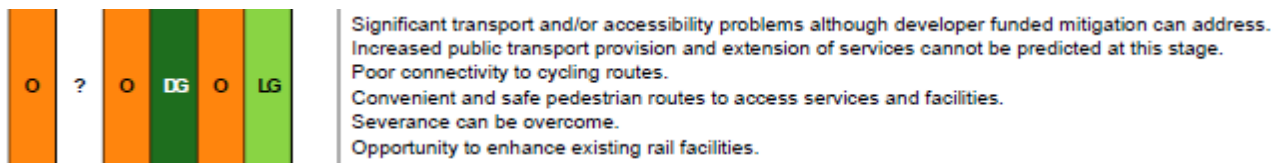
Most residential development is unlikely to impact on air quality.

Adverse effects on water courses are real costs but can often be mitigated.

Proximity to a main road a real but manageable cost.

There is nevertheless a marginal negative rating, which if supported by contacts amongst the Parish Council's external consultees are worth pursuing.

10. A transport network which maximises access and minimises detrimental impacts



Relatively poor rating reflects real costs.

Opportunity to enhance existing rail facilities may be no more than speculation.
 No evidence of a feasibility study.

The 2015/2016 Travel Model prepared for the Council by Jacobs Consultants did not take account of sites PN17, PN18 and PN19 because they were not included in the 2016 draft plan.

13. & 14. Protect and Enhance the Historic Environment & A Quality Built Environment

R								Likely to result in harm to significance of heritage asset.
na	na	na	N	N	R	DG		Negative impact on local distinctiveness. Mixed use can be accommodated.

Poor ratings here reflect real costs

OVERALL

The site scores poorly which suggests the allocation is not justified. Again landscape appears the strongest ground.

9. CONCLUSION

- 9.1 On the basis of the Council's own sustainability appraisal the three sites – PN17, PN18 and PN19 perform poorly. However, much new development performs poorly when seen in isolation. It can nevertheless be justified by the wider needs of society which needs land for housing, employment, infrastructure and services. A planning authority must therefore allocate enough land to meet these wider needs while minimising the inevitable adverse effects.
- 9.2 Nonetheless, the strength and amount of negative assessment within the sustainability appraisals give grounds for well-founded objection to the allocation.
- 9.3 Our research reinforces the reasons for objecting discussed with the Parish Council and we hope, gives them insight into the evidence base and background used by the Borough Council.
- 9.4 This in turn should demonstrate which of the evidence base documents can be quoted in support of the objection and which arguments will be more difficult to justify.
- 9.5 Landscape impacts are the primary consideration for all of the sites and our research shows that this is the area where the Borough Council's own assessments best support the Parish Council in objecting.
- 9.6 As we have said above Parish Councils and those advising them rarely have the resources to take the wider perspective, which involves the competitive assessment of all the sites within a district. Even so, in the present case, and on the Borough Council's own analyses, the three sites perform so poorly that it is likely that alternative locations will meet the calculated land requirements at less cost and with greater benefit. In the case of employment there is evidence that the draft plan, as augmented by the additional sites now identified, has over-estimated the required land supply. This might be a justified approach when over-allocation has few negative effects but in the case of site PN18 these are sufficient to justify removing the allocation even if no alternative allocation elsewhere in the District is identified.

Arrowsmith Associates
August 2017