**PC’s response framework guide for entry onto the HBC Portal**

**Box 3a. To which document does your response relate? Select one from the list below.**

Harrogate District Local Plan: Publication Draft

**Box 3b. Policy reference. To which policy does your response relate?** Policy DM1 Housing Allocations

Site Reference. PN17

When asked “Paragraph/figure number”, add “See box 6 and 6a” which will accommodate the reference to paragraphs.

Development Limit. Pannal

Policies Map. Pannal

**Box 4. Soundness/Legal Compliance**

No to both Legally compliant and Sound – but see comments in box 6

**Box 5. “Tests of Soundness”.**

Tick all four of - Positively Prepared, Justified, Effective and Consistent with national policy – but remember to refer to these in your comments in box 6 (if applicable).

**Box 6. Reasons for your response.**

Note the explanatory text: “*Please give details of why you do, or do not, consider the Harrogate District Local Plan to be legally compliant or sound. Your reason(s) should concisely cover all the information, evidence and supporting information necessary to justify your comments, as there will not normally be another opportunity to make further representations after publication stage. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues she/he identifies for examination.” And “Please give reasons for you answer to 4(1), 4(2) and 5, where applicable. (You may also use this box if you wish to make representations on the Sustainability Appraisal, Habitat Regulations Assessment or Equality Analysis Report.)”*

Suggested copy for Box 6 (maximum capacity is 20,000 characters – typically 6 pages of A4). Note that the “SaveCrimpleValley responses to Draft Local Plan” is a good guide and is posted on our website here - <http://www.pannalandburnbridge-pc.gov.uk/Planning_18373.aspx> but is 22,000 characters in length, so make your own adjustments. See also the example response to PN17 available on the site.

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| 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.   And see LP response guide v4  Key points to make  LVIA - and erosion of the Landscape Gap 2016 the review of the SLA – PN17, 18 and 19.  The absence of an SEA study. There is a legal requirement to consider cumulative impacts in the  Local Plan process. It is of concern that cumulative impacts were not considered at a Primary Service Village level (which Pannal is) despite the fact that this village play an important part of the Growth Strategy and is a key through route for traffic in transit to and from the west of Harrogate and the A61.  HEDNA Report. Question the rationale behind the numbers and why Council Officers failed to provide an opportunity not only for the public but also their own councillors to consider and make a decision on the HEDNA findings. This is a fundamental point to examine and throws doubt on the legality of Harrogate’s Local Plan process. Why between 2016 and 2017 increase from 11,697 houses in the next 20 years to 14,049. And now 16,077 proposed new houses in its Draft Local Plan (15% more than the calculated requirement of 14049)  Traffic studies  Strategic Infrastructure  Employment Land – PN18  Legal Compliance – self build regulations and LCR’s reduced housing needs.  Flooding  Delivery of New Infrastructure. The Infrastructure Development Plan and Infrastructure Capacity Study highlight a number of shortcomings that threaten the ability of the Local Plan to be fulfilled (SCV response Paper)  Policies:  From HAPARA key areas seem to be agreed as:  Infrastructure.  The high housing numbers based on the HEDNA study.  Traffic and the `biased` calculations used so far.  The process itself which seems to have been designed so as to make it extremely difficult to submit comments. |

**Box 6a. Additional information.**

If you tick the “yes” button, a new menu drops down to allow up to three files to be uploaded. The PC will include files commenting on the Landscape and Visual Impact Assessment (LVIA) for PN17, 18 and 19, the Traffic report (for PN 17, 18 and 19) and the Employment research for PN18.

**Box 7. Modifications.**

Note the explanatory text: *“Please set out what change(s) you consider necessary to make the Harrogate District Local Plan legally compliant or sound, having regard to the test you have identified at question 5 where this relates to soundness. You will need to say why this change will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text. Please be as precise as possible.”*

Opinions might include:

* Find other sites west of the railway, A61, close to the A1 (M) etc where there is less pressure on infrastructure.
* Specifically, why not: the TESCO site on Ripon road; sites towards the A1 and A1(M) (Cattal / Green Hammerton could be considered a new “settlement” where all the infrastructure will be or is already in place); Flaxby North (the former golf course); 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) and the stock of ex MoD married quarters empty in places like Ripon.
* Formal review of the questionable economic uplift figures. None of the reports HBC have used – HEDNA, Jacobs traffic report etc – have been challenged or subject to public scrutiny and the Council Officers failed to provide an opportunity not only for the public but also their own councillors to consider and make a decision on the HEDNA findings. This is a fundamental point to examine and throws doubt on the legality of Harrogate’s Local Plan process.