**Draft Local Plan – Consultation on Publication Draft**

**Proposed comments to be submitted by HAPARA**

**Section 2 - Vision**

Paragraph 2.7

Quote: “In addition to improvements on the Harrogate rail line, the quality, frequency and reach of bus services has been protected, and there are now greater opportunities to make journeys safely on foot or by bike. While these improvements have reduced the need to travel by car, investment has also been made in the road network that has achieved reduced levels of congestion and improved air quality.”

Comment: This is an idealistic vision which is incapable of being met through the proposals, or in some cases lack of proposals, in the Plan. The track record over recent years has been one of lack of investment and steady worsening of congestion and air quality. It is disingenuous to give a vision which is not achievable.

Modification: rewrite the vision to give a more realistic view of the situation considered to be attainable by 2035.

**Section 3, Policy GS1**

**Paragraph 3.5**

Quote: The HEDNA concludes that the objectively assessed housing need in the district is 669 dwellings per year, which over the plan period equates to 14,049 new homes

Comment: Comparing documents in the evidence base, the number of houses needed across the district increased by 20% between the assessments carried out in 2016 and 2017. Specifically, the document issued in June 2016 stating that the council needed to build 11,697 houses up to 2035. Less than a year later this changed to 14,049. No satisfactory explanation is given for the increase. This is against the background of five changes to the assessed need in the last four years. This lack of consistency throws doubt on the objective nature of the assessment.

Modification: Reassess the housing need to provide a more consistent forecast in relation to earlier assessments, with full explanation of changes. Make adjustments in the light of the Government’s emerging forecasting methodology.

**Paragraph 3.6**

Quote: The HEDNA also considers the level of affordable housing need in the district and finds that there is a need for 208 affordable homes per annum

Comment: Comparing documents in the evidence base, the number of affordable houses needed across the district decreased by 18% between the assessments carried out in 2016 and 2017. Specifically, the document issued in June 2016 stating that the council needed to build 5383 affordable houses up to 2035. Less than a year later this changed to 4397. This represents only 31% of the total housing need. No satisfactory explanation is given for the decrease. This lack of consistency throws doubt on the objective nature of the assessment.

Modification: Reassess the affordable housing need to provide nearer to 40% of the total housing need. A more consistent forecast in relation to earlier assessments, with full explanation of why changes are being made, is required.

Section 5, Policy HS2

**Paragraph 5.16**

Quote: Overall the HEDNA analysis identifies a need of just under 4,400 affordable homes in the period from 2014 to 2035, equating to a requirement for 208 additional affordable homes per annum. This comprises around 30% of the objectively assessed need of 669 dwellings per annum.

Comment: Comparing documents in the evidence base, the number of affordable houses needed across the district decreased by 18% between the assessments carried out in 2016 and 2017. Specifically, the document issued in June 2016 stating that the council needed to build 5383 affordable houses up to 2035. Less than a year later this changed to 4397. No satisfactory explanation is given for the decrease. This lack of consistency throws doubt on the objective nature of the assessment.

Modification: Reassess the affordable housing need to provide nearer to 40% of the total housing need. A more consistent forecast in relation to earlier assessments, with full explanation of why changes are being made, is required.

**Section 10: DM1 - Comments on Sites H49, H51 and H70**

Justified X

Consistent with National Policy X

This site lies within the Special Landscape Area “Oak Beck Valley to the west of Harrogate including Birk Crag and Cardale Wood”. Development on the scale proposed here would be contrary to the aims and objectives of Harrogate’s own landscape guidelines and emerging policy relating to landscape protection (draft policy NE4) and the Harrogate Character Landscape Assessment. *In addition it has an adverse visual impact on the major tourist attraction of Harlow Carr Gardens [H49 only]*.

Trips from this site will be a highly car-dependent because of its location beyond the outer fringe of the town and the lack of existing or future sustainable mode choices offering significant alternatives to the car. Consequently development on this site would be inconsistent with NPPF paragraph 34 as reflected in draft policy TI1 (D): “Ensure development proposals seek to minimize the need to travel and achieve more sustainable travel behaviour”.

Development on this site would be inconsistent with NPPF paragraph 35 as reflected in draft policy TI1 (E) “Locate, as far as possible, the majority of future development so that it is accessible to a station on the Leeds-Harrogate-York railway or within the key bus service corridor”. The site does not lie within a key bus corridor and is not accessible to a station on the Leeds – Harrogate – York railway, being approximately 4 km from the nearest stations. Equally it is inconsistent with draft policy GS2 “The need for new homes and jobs will be met as far as possible in those settlements that are well related to the key public transport corridor and have regard to the capacity of infrastructure within the settlement”. Otley Road is already at full capacity and any further use of the minor or residential road network will be unsafe and environmentally damaging.

Development would also be inconsistent with NPPF paragraph 30 as reflected in draft policy TI1 (B) “Seek reductions in traffic congestion”, as increases in congestion will inevitably arise through inadequate transport infrastructure proposals (evidence base “Traffic Modelling Update, Jan 2018”)

Development on this site will fail two of the three dimensions of sustainability in the NPPF, namely:

On the social dimension:

1. Its location beyond the outer fringe of the town will not lend itself to the creation of strong and vibrant communities because it will be well beyond the existing community of Harlow and Pannal Ash, which, with its own limited community facilities, looks towards the Cold Bath Road area for its community identity.
2. The cumulation of this site with the committed developments at Crag Lane and Bluecoat and the draft policy sites H88, H51, H70 and H36 would create an urban sprawl equivalent in size to a new settlement, but without the comprehensive settlement planning which would normally be necessary to create the facilities for a strong and vibrant community.

On the environmental dimension:

1. Development of this site will damage the natural environment which is designated part of a Special Landscape Area, on a highly visible rural approach to the town.

H49 Modification: Remove this site from the plan. The loss of housing numbers can be accommodated within the flexibility built into the plan, but if necessary the reduction can be wholly or partly compensated by increasing the size of proposed new settlements near the A1 where the policies and objectives of the draft plan can be better achieved.

H51 and H70 Modification: Substantially modify the boundaries of the site, as recommended in the DRaW report dated 22 February 2018, to avoid development of the prominent south-facing slopes and significantly reduce the adverse landscape and visual effects on the wider landscape.

**Sustainability Appraisal**

**Paragraph 3.25**

Quote: A more immediate issue, however, will be new development within the urban areas which will impact on primary school pupil numbers. While in 2011/12 there were two secondary schools in the district operating at or above capacity, in 2014/15 this has reduced to only one- St John Fisher Catholic High School in Harrogate.

Comment: The plan contains no details on how both primary and secondary school numbers will be catered for, given that all the schools in the western sector of Harrogate are at full capacity.

**Paragraph 4.11** (Appraisal of the Draft Local Plan Objectives against the SA Objectives)

Justified X

Consistent with National Policy X

Quote: “SA Objective 10: A significant amount of new housing is proposed in the main settlements of Harrogate, Knaresborough and Ripon, which have the best access to public transport and local services, and where there is the greatest potential to reduce the need to travel and/or encourage more sustainable travel.”

Comment: The plan proposes development on the western fringe of Harrogate, which cumulatively amounts to 24% of the total plan provision, in an area with the poorest access to public transport and with the least potential to reduce the need for travel.

Modification: Reduce the volume of housing on the west side of Harrogate to those site which are currently committed. If necessary, increase housing numbers in areas where transport infrastructure exists or can be readily upgraded.

**Paragraph 6.2** (Assessment of Growth Strategies)

Justified X

Consistent with National Policy X

Quote: “Concentrate growth in strategic transport corridors (Harrogate rail line and strategic bus routes.”

Comment: The plan proposes development on the western fringe of Harrogate, which cumulatively amounts to 24% of the total plan provision, in an area which has no strategic bus route and is several kilometers from the Harrogate rail line.

Modification: Reduce the proportion of growth not in strategic transport corridors to below 10%.

**Paragraph 10.2** (Cumulative impacts of the Draft Local Plan)

 Positively prepared X

 Justified X

Quote: “The Draft site allocations have been assessed for their cumulative impact on the local and strategic highway network over the plan period”

Comment: The assessment of the impact of site allocations on the highway network relies on the traffic modelling update (January 2018) in the evidence base. The conclusion in the traffic modelling report that “the network is … able to absorb the increase in demand” is derived from a modelling strategy which allocates large increases in flow along residential streets. Clearly the model has been set up to constrain the flows at critical junctions to 100% VCR (Volume to capacity ratio) and flows above that are assigned through a variety of residential streets.

Firstly 100% VCR represents an unacceptably high saturation level at junctions and is inconsistent with the NPPF paragraph 30 aim of reducing congestion and greenhouse gas emissions.

Secondly, this ignores the social and political implications of directing through traffic through residential areas, including the NPPF requirement to promote healthy communities, and must be regarded as impracticable.

Crucially, no alternative scenarios appear to have been tested and no consideration has been given to uncertainty across the range of model parameters as required by government guidance. For these reasons we submit that the cumulative impact has not been reasonably assessed.

Modification: The current transport modelling work is not adequate for purpose. Re-run the transport model with restrictions on the use of residential streets. Carry out a series of sensitivity tests of the transport model in line with government guidance (Tag Unit 4) and re-assess infrastructure requirements where future capacity ratios exceed 85% VCR.