

Henry Pankhurst,
Harrogate Civic Society,
38, St.Clements Road,
Harrogate,
North Yorks HG2 8LX

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Tracey Rathmell,
Planning Policy Manager,
Planning & Development,
Harrogate Borough Council,
P.O.Box 787,
Harrogate.

Dear Madam,

Harrogate District Local Plan Consultation October – December 2016

We shall take the chapters and policies of the Draft Document in order, but some cross referencing may be necessary. We commented on the draft policies in the consultation of November 2015 and concluded that many were well drafted. It is also our opinion that generally the policies in the current document are very good.

1. INTRODUCTION

Housing Strategy 2015-2020

1.12 It is difficult to understand why it is stated that ‘the supply of housing both affordable and market has fallen behind household growth’. The figure for dwellings with planning permission given in Chapter 10 - Delivery & Monitoring, is 4627, which is more than 8 years supply in itself. What is meant by the term ‘housing growth’? Is this a need due to natural growth from within the District? It is well known that in years gone by in-migration has accounted for in the region of half of housing provision in the District. How does the current situation compare to this?

1.13 Certainly a better balance is required in the housing market to assist local people in pursuing employment opportunities, especially in the lower paid jobs. This para says that this will be achieved ‘through increasing supply’. Supply cannot increase unless dwellings are built. As above, there are a very large number of dwellings with permission, but if builders are not building what will make them? Historically almost all housing allocations and other consents get built out in the Harrogate District.

2. VISION & OBJECTIVES

New housing and employment development results in investment in the transport system, the vision says. What we have actually seen over the years is housing development that has more than kept up with the numbers that were required in the Local Plan 1991-2006, to the extent that oversupply of 29% was recorded at one stage. This resulted in the Interim Housing Release Policy that fed into the Selective Alterations of 2004. The evidence of investment in the transport system is not obvious when residents see much increased congestion, no hint of the Harrogate Transport Interchange or ‘Hub’ on Station Parade, very poor railway stock on local journeys and still very few direct rail services to London. If infrastructure has fallen behind, even with current housing development, what realistically can we expect in future?

Objectives 12-15 Infrastructure & Connectivity

All very good but note past experience as above. How will this Local Plan be better at delivery?

3. GROWTH STRATEGY

The growth strategy says that there are high resident skill levels with the District residents, some of the most qualified in the north of England. However, there is a skew towards low value sectors in employment opportunities. It is acknowledged that the District has a high proportion of above average priced homes (**para 1.9**). These facts emphasise the need for affordable housing. (See comment later). Although household projections show a lower rate of growth than either the Region or England as a whole, our District has a high degree of restraints such as the Green Belt, the AONB, much good quality agricultural land and landscape etc.

Draft Policy GS 1 Providing New Homes and Jobs

How is a growth rate for the Travelling Community decided? The fact that by definition it is nomadic suggests that there could conceivably be a reduced need for traveller pitches. **Is there any reason to suppose that the need will grow in line with the resident community?** (See Policy HS 10)

3.5 It is rather alarming to think that the market housing target could be artificially increased in order to supply the requisite number of affordable homes, should the percentage of affordables cumulatively achieved fail to satisfy the need. (See Policy HS 2)

3.6 We are pleased that an uplift as above has not been applied.

Draft Policy GS 2 Growth Strategy to 2035

We agree with the provisions of this policy regarding the general distribution of new housing. We are pleased that the percentages for distribution of housing over the towns and villages as contained in Policy SG1 of the Core Strategy have been dropped. **The important thing is to allocate housing where it will best go according to area and site characteristics.** Prime examples of this would be R24 the Deverell Barracks site and R25 the Claro Barracks site (mixed use) both in Ripon. To avoid developing some of the rural sites around Harrogate that are damaging to the landscape and approaches to the town **we regard it as essential that one of the two options for a new settlement is allocated. The one we favour is site FX3 at Flaxby (along with site FX4 as an employment allocation).** Our reasons are that FX3 has a greater capacity than GH 11 at Green Hammerton/Kirk Hammerton/Cattal. This frees more land elsewhere from development, it is next to the A1M Junction 47 and the railway line runs alongside. Also the two sites complement each other with housing and employment adjoining. The Council must take all possible steps to find a developer or developers to take on a new settlement.

A very important site that has recently become available is **the site at New Park that TESCO no longer requires for a new superstore. This should be investigated with a view to including it in the Local Plan probably for mixed uses.** It is an ideal site that would relieve the pressure on more sensitive sites. Later in this response we will suggest some housing sites that should not be allocated in the Draft Plan.

Draft Policy GS 3 Development Limits

This response being from the Harrogate Civic Society, we comment on development limits largely for Harrogate. We appreciate that it is natural to extend development limits where permission has been given for sites that are currently outside of development limits. Some large areas of extensions however are unwelcome. We are not content to see certain significant and valued areas of Special Landscape Area and countryside extensively built upon and urbanised.

In particular to the south west of Harrogate including the proposed land allocations of sites H49, H51 & H70, also at sites PN14 & PN16 plus H48 with H21. It should not be necessary to provide the housing and employment land requirements by extending those limits as proposed. If more employment land is desirable in the area of mixed use Site H51, then a modest extension adjoining the existing employment site of Cardale Park would be acceptable. After all, the Draft Plan proposes only 8ha for employment land out of a total site area of 41.8ha.

Regarding the proposed Gypsy & Traveller site PN16, there is no need for it or possibly any other location for this purpose to be within a development limit. Regarding the housing allocations we note here, comment will be made later under Chapter 10 Delivery & Monitoring, to further justify our view that certain proposed areas of development limits should not or need not be extended.

Draft Policy GS 4 Green Belt

We are pleased to see that the Green Belt area and its potential uses will not be changed.

Draft Policy GS 7 Health & Wellbeing

Whilst there is no disagreement with any of the provisions of this policy, **it seems redundant in that the criteria are dealt with under other policies of the plan.**

4. ECONOMY

Draft Policy EC 1 Protection and Enhancement of Existing Employment Areas

We support the retention of existing employment areas. **Curiously though, this policy also deals with draft allocations (once developed). BUT it does not list the mixed use sites which would provide employment land. Perhaps the policy should be renamed to be all inclusive of employment sites existing and proposed.**

We strongly support site FX4 as an employment allocation along with the new settlement proposal FX3 (see comment on Policy GS2).

Regarding the mixed use sites **we support the employment element of site H51** (as noted under GS3). Site H37 at Station Parade Harrogate has long awaited development. A development brief was published in 2005 and this site forms an important element of the Harrogate Town Centre Strategy and Masterplan but no useful proposal has come forward, which is regrettable.

Draft Policy EC 2 Expansion of Existing Businesses

This is a sensible policy but a note should be added to the effect that **if the consequences of a business expansion are only borderline acceptable, then encouragement and assistance will be given to finding a more suitable location.**

Draft Policy EC 3 Employment Development in the Countryside &

Draft Policy EC 4 Farm Diversification

Re-use and adaptation of existing buildings is to be encouraged. It must be emphasised that uses under the headings of farm diversification which are outside of development limits should be small-scale.

Draft Policy EC 5 Town & Local Centre Management

We agree with criteria A that protects A1 use within Primary Shopping Frontages. In Harrogate though, Primary Shopping Frontages should be extended. It is realised of course that Secondary Shopping Frontages may include uses that do not conform to A1 use. If this is taken as a reason not to re-classify any Secondary Shopping Frontages then there will never be any changes! We can only start from where we are and ensure that a good balance between retail and other uses is not compromised. Harrogate must remain an attractive place to shop for residents and visitors alike and

not become biased towards bar and restaurant uses. We see the new building on the Beales site completely focussed on A3 & A4 uses and Parliament Street being dominated by A3 & A4 as well.

For this reason, the Civic Society suggests an extension of the Primary Shopping Frontage to Parliament Street and possibly across to the Montpellier Quarter, thus also better connecting important shopping areas of the town. Bars and restaurants favour outside seating therefore Parliament Street is not as suitable for A3/A4 uses because of its steep gradient.

There would be no shortage of bars and restaurants as those existing in these areas and other parts of the town will remain. The option of A3/A4 premises to revert to retail is always a possibility though.

We fully agree that Secondary Shopping Frontages in our towns and local centres should be protected from uses or concentrations of uses that harm their vitality and viability. It is questionable whether criteria B iv would protect a shopping area when it says that proposals resulting in three or more consecutive shop units in non A1 use should not be approved. The result could be that two thirds of shop premises in a street were in non A1 use, therefore **a different means of control than that proposed is necessary. We suggest that no more than say a third or 40% of non-retail uses in a street should be the rule.**

Draft Policy EC 6 Protection of Tourist Facilities &
Draft Policy EC 7 Sustainable Rural Tourism

We are content with these policies

5. HOUSING

Draft Policy HS 1 Housing Mix & Density

Housing developers often seem to prefer housing developments that produce fewer but larger homes with more bedrooms. **Para 5.4** points out that future housing provision should be focussed on delivering two and three bedroom homes. Considering that Harrogate has difficulty in providing homes for those on modest wages, this is only right. The town has a need for people to work in service industries because of the conference and exhibition trade and tourism etc., who find Harrogate a very expensive town. Increasing numbers of smaller household sizes also demand a greater proportion of modest dwellings.

Because of the constraints of Green Belt, AONB, high quality agricultural land and Special Landscape Areas etc. the town cannot afford to use up land allocations with low density housing. Thus we cannot disagree with a general minimum density of 30dph. We acknowledge, as does the policy that exceptions can be permitted.

Draft Policy HS 2 Affordable Housing and Starter Homes

We note that 40% affordable dwellings will be required on qualifying developments of more than 10 dwellings. **This is an improvement on Saved Local Plan Policy H5** which had a threshold of 15dws (reduced from 25dws by the Selective Alterations of 2004). Rural developments of six or more dwellings will also be required to contribute but by a commuted sum if necessary.

The original draft of the Core Strategy had policies that required a contribution from ALL new housing developments towards affordable housing, a policy with which we agreed. Unfortunately the Core Strategy Inspector decreed that these policies should be deleted.

We urge that such policies should be reinstated in the current draft Local Plan.

5.21 The stipulation that a large site should not be artificially sub-divided in order to avoid the affordable housing requirements is absolutely necessary.

We would urge that the Council is reasonably relaxed about the general principle of providing affordable dwellings on site. It has been known that a greater number of affordable dwellings could be provided by accepting off-site provision or by a commuted sum. This should be borne in mind in the negotiations and perhaps such a possibility should be written into the policy.

The need for affordable housing is such that all avenues must be explored and taken advantage of.

Draft Policy HS 3 Self & Custom Build Housing

It is a new departure that the Council is required to acknowledge and support such housing provision. As this is a brand new policy, it may be more susceptible to revision than many tried and tested formats. The policy says, and we agree, that self and custom build housing must be occupied as homes by the applicants. This begs the question – for how long?

5.29 Self build homes will have to be completed within 3 years of purchase of the plot, but what is the position if such a dwelling is only partially built by that date? The justification says that this type of housing has to conform to affordable housing requirements. Self- build could be considered to result in a degree of affordability in some cases, being the means of home ownership where open market housing was financially out of reach. In many instances a self-build home would probably amount to a low cost home and in others a larger or better home than the applicant could afford on the open market. In these ways, a self-build dwelling is ‘affordable’.

So, can, or will modest self-build dwellings be regarded as affordable in the planning policy sense? If so, then such homes would, we assume, be considered to contribute to the 40% affordable housing requirement. If the normal conditions of affordable housing or starter homes, as in draft policy HS2, are not complied with, then obviously they won't. There is the possibility that some could/would and others could/would not meet the requirements.

Draft Policy HS 6 Conversion of Rural Buildings for Housing

We support this policy and note that in the Housing Monitoring Report 2015 the conversion of agricultural buildings resulted in a modest 30 dwellings. All sources of reasonably predictable housing provision are welcome and should reduce allocations.

Draft Policy HS 10 Providing for the Needs of Gypsies and Travellers

The site proposed, PN16, has a gross area of 1.501ha. Looking at the site, it seems large for the provision of 7 pitches. Is there any future-proofing built in? The Crimple Valley is a very valuable Special Landscape Area of countryside on one of the busiest approaches to the town and the land take for this allocation plus the two parts of housing allocation PN14 is large at a combined area of 17.6338ha.

Permission has recently been granted for an extension of the Leeds Road Mercedes agents on its northern boundary. We object to these incursions into the SLA. Concerns also extend to the access to the gypsy site. Obviously the A61 Leeds Road is a major route to and from Harrogate. The gypsy site would of necessity accommodate large vehicles and large caravans or motor homes. Manoeuvring these in, and out onto the A61 gives rise to likely hold-ups and traffic hazards. We note provision A., that sites “*should be located where there would not be a detrimental impact on highway safety and the flow of traffic*”.

Provision C. Sites should “*not harm the natural and historic environment including landscape character*”.

As above, we believe that landscape character of this SLA would be harmed. The natural environment here includes the Crimple Beck which runs along the western edge of the site and we fear that a gypsy encampment could well be responsible for its pollution.

Also along this western edge runs the ever popular Ringway Footpath. Enjoyment of this footpath would be reduced by the gypsy site and considerably more so if the western section of housing site PN14 is developed.

At D., we see that there should be no “*significant adverse impact on residential amenity*”. It seems obvious that there would be such an impact with PN16 & PN14 existing together.

If PN16 is developed as a gypsy and traveller site, there is an implication in the policy that its extension rather than another new site would be favoured. Applications for new sites “*will need to include a statement to justify why an existing site cannot be extended.....*”

We would therefore expect currently existing sites to be extended before implementation of PN16.

Policy HS 10 is totally silent on the topic of the maintenance and control of existing or future gypsy sites. Any such site could easily and quickly become an eyesore or even a health hazard to the detriment of neighbouring property and to dwellings that may be built on site PN14. An adverse effect on amenity could include noise, smells, rubbish, health hazards and visual. **It is vital to know that there are means of control to keep a site neighbour friendly. How and by whom would this be achieved on site PN16 or any other site?**

6. TRANSPORT AND INFRASTRUCTURE

Draft Policy TI 1 Sustainable Transport

The real problem is that Harrogate Borough Council can do very little of significance on its own account.

For instance, what does it mean at B. “*Seek reductions in traffic congestion in Harrogate, Ripon & Knaresborough*”. All we seem to get are minor works from developers through Section 106 agreements or the phasing of traffic lights and a few road markings. When it comes to NYCC Highways, we get the feeling that anything goes and that problems are hardly ever seen with any development that minor tinkering won’t solve. The cumulative effects of traffic from new development don’t figure very much with NYCC. At E. we read “*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*”.

In the region of 2500 dwellings are envisaged in the area of Harlow Hill, Pannal Ash and out towards Beckwithshaw. They do not seem particularly well related to the Public Transport corridor as shown on the Key Diagram.

The Council has to achieve as much advantage as possible from developers and be a ‘thorn in the side’ of all the agencies that can provide better public transport and effective road improvements, but obviously not roadworks at any price to the environment.

Draft Policy TI 2 Protection of Transport Sites and Routes

Clearly, possible and reasonably predictable routes need to be protected.

In particular we fully support protection of the former railway routes, Harrogate-Ripon-Northallerton, and Harrogate-Wetherby.

Draft Policy TI 3 Parking Provision

As with Sustainable Transport, Harrogate Council is constrained by NYCC as the Local Highway Authority. Parts B & C (Parking Standards and Strategy) are not under the control of HBC.

6.21 Park & Ride – NYCC are not being proactive here. Consideration should be given to Park & Ride as part of redevelopment of the TESCO site. Park & Ride should also be promoted, for instance, if a new settlement at Flaxby is built, (Sites FX3 & FX4) and at Manse Farm Knaresborough (site K31) where land is being reserved for a rail halt. We note how successful the Hornbeam Park rail halt has been.

Draft Policy TI 4 Delivery of New Infrastructure

Our comments on Draft Policies T1 3, T1 2 & T1 3 apply here

7. CLIMATE CHANGE

We cannot but support all the four policies in this chapter. Much of the content of these policies would be needed or desirable, even without the threat of climate change.

8. HERITAGE & PLACEMAKING

Draft Policy HP 1 Harrogate Town Centre Improvements

We made detailed observations on the Harrogate Town Centre Strategy & Masterplan. Policy HP 1 is supported by the HTCSM.

Our comments on Policy EC 5 Town & Local Centre management apply here and should be read as our views on this policy also.

There is no mention of public toilets in this policy. Speaking in general, but of Harrogate in particular, with a growing population and a desire to attract more visitors to the town and the district, **we regard it as a grave deficiency if sufficient and convenient public toilets are not available.** We regret that toilets at the top of Montpellier Hill (the 'Pier Head') were lost some years ago. More recently, we saw the destruction of the toilets on Devonshire Place/Regent Parade. We hear that the toilets currently at the Victoria Shopping Centre and available until mid-evening will cease to be accessible from outside the building on Station Parade and will only be available during shopping hours. Prior to the building of the Victoria Centre, public toilets existed on Station Square. **Provision should be made for public toilets, especially where there have been losses. The town is growing in terms of population, visitors and desire of the Council to mount big events.**

We re-iterate our full support for a transport hub on Station Parade along with the mixed use of the area as we commented under Policy EC 1 (site H37).

The lorry/coach/car park at Dragon Road could be a useful development area (as noted at **8.10**), providing a satisfactory parking or holding area is found elsewhere, which seems unlikely at least at present. The Royal Hall/Exhibition Halls site should not be compromised by introducing too much parking which would negate the intention of improving its attractiveness. Vehicles should only be on site whilst servicing the facilities.

Regarding parts C & D of the policy **we are not in favour of extension of pedestrianisation or increased areas of hard landscaping.**

Part E Management of the night-time economy, is referred to to a degree in our comment on Policy EC 5 in respect of **dilution of the retail offer in favour of dominance of A3 & A4 uses, which should be avoided.**

Heritage & Place-making Draft Policies HP 2 – HP 9

The Council has a good record of formulating policies such as these and we believe that they will be satisfactory for the determination of planning applications.

9. NATURAL ENVIRONMENT

The Harrogate District has a very fine natural environment and the eight policies of this section have the potential to see that it is well looked after. The greatest danger to the natural environment is over-development, of course.

Draft Policy NE 1 Air Quality

9.5 Skipton Road Harrogate from the New Park roundabout to the Empress roundabout suffers from frequent and extreme traffic congestion – it can take half-an-hour to drive this short distance.

Similar congestion often occurs on Wetherby Road Harrogate from the Empress roundabout to the Woodlands junction. Do these areas not require an Air Quality Action Plan?

Draft Policy N E4 Landscape Character

We are pleased to see that similar special Landscape Areas are marked on the Proposals Maps as were included in the LP 1991-2006, although some SLA land is now a housing commitment or potentially a housing allocation. **We comment on this in response to Chapter 10 Delivery & Monitoring, where we conclude that it is not necessary to allocate certain SLA 's to housing.**

10. DELIVERY AND MONITORING

Our main concern is the delivery of housing as housing has the greatest potential to have an adverse effect on our natural and built environment and on the ever increasing traffic problems. Most other aspects of planning for the District are much more susceptible to control in order to avoid damage and adverse effects. Traffic is another facet which HBC by itself can have only a minor influence on, and in any case traffic is exacerbated by the growth of the District. Natural growth from within the District will arise from births, smaller household sizes and an increasingly long lived population. Plus of course immigration, projected figures for which we have not seen, although these are probably buried somewhere in published information.

New Settlement Options

10.9 We are in complete agreement that a new settlement should be built. As this para. says *“there are insufficient suitable and available sites in the main or in other settlements.....to meet this need in full.”*

We favour the land at Flaxby (FX3 plus FX4) being developed for the new settlement. Our reasons are several. FX3 has the greater housing capacity when compared with GH11 and so can provide more relief for the main towns. There is the employment site (FX4) proposed alongside. Both FX3 & FX4 are at junction 47 of the A1(M) with the A59 and A168. The Harrogate/York railway line passes along the southern edge of sites FX3 & FX4 with perhaps the possibility of a rail halt in the future. The Green Hammerton/Kirk Hammerton/Cattal site (GH11) also has advantages but is smaller, lacks almost direct access to the A1(M) and does not have an employment allocation adjoining. However, there are existing railway stations at its eastern and western ends.

Draft Policy DM1 Housing Allocations

The potential yield according to the yield figures on the maps of all 65 allocated sites is a total of 5060 dwellings.

The requirement said to be 13,073 homes including buffer and shortfall for the plan period 2014 to 2035. Deductions are noted for completions, permissions and windfalls. We are pleased to see a windfall allowance as this has always been a significant source of housing completions. From the 13,073, 6864 has been deducted, leaving a residual requirement of 6209 dwellings.

The list of allocations for housing does not include the five mixed use sites – H37, H51, H63, K17 & R25. Two of these are very large - H51 (East of Lady Lane) & R25 (Claro Barracks). H51 has been allotted a potential 690 dwellings & R25 has been allotted a potential 540 dwellings. The three other much smaller mixed use sites have no dwellings figure allotted.

The potential yield from all the housing allocations listed (5060 dwellings) plus that for the two large mixed use sites (1230) is 6290 dwellings, which, although allowing none for the smaller mixed use sites, more than covers the residual requirement of 6209 dwellings.

Additional contributions to housing completions will come from small sites, prior notifications and conversions.

Very significantly though, the policy says *“a new settlement is being proposed which will help to meet the need within the plan period and beyond”.*

(a) Taking the housing allocations, large mixed use sites and the new settlement at Hammerton (GH11) together – 5060 dwellings + 1230 dwellings + 2774 dwellings – we have a total of 9064 dwellings.

(b) Taking the housing allocations, large mixed use sites and the new settlement of Flaxby (FX3) together – 5060 dwellings + 1230 dwellings + 3244 dwellings – we have a total of 9534 dwellings.

Deducting the HBC figure for the residual requirement (6209 dwellings) from the total at option (b) (our favoured option – see our reasons under Policy GS 2) 9534 dwellings, gives an over allocation of 3325 dwellings.

So, not even taking into account any other modest additions that could be included in the housing potential or under-estimates of yield, there is massive scope for avoiding the use of the sites that would be most damaging to the rural aspect of our towns and further unacceptable traffic congestion and pollution. Note also the availability of the TESCO site at New Park, as we commented at Policy GS 2.

Sites that should not appear in the allocations for Harrogate are –

H49 WINDMILL FARM	722 dwellings
A very large and unwelcome incursion into the SLA	
H65 HARLOW NURSERIES	52 dwellings
A SLA and with an impact on the enjoyment of the Pinewoods	
H70 EAST OF WHINNEY LANE	183 dwellings
H51 EAST OF LADY LANE (the housing portion)	690 dwellings
Largely in the SLA.	
See comment under Policy TI 1 in relation to the above four sites	
H21 LAND AT KINGSLEY DRIVE) 173 dwellings
H48 LAND ADJCENT TO KINGSLEY FARM)
An unnecessary development impacting on the openness of the Bilton Triangle	
PN14 EAST AND WEST OF LEEDS ROAD PANNAL	214 dwellings
High impact on the Crimple Valley SLA and a main approach to Harrogate. See comment at Policy HS 10.	

Even these deletions from the list of housing allocations amounting to 1820 dwellings do not account for all possible deductions, but we confine ourselves to areas in and close to Harrogate town.

Housing growth must be managed to the best advantage for our towns and countryside. That is, to take full account of all housing that can be reasonably predicted to come forward. In the light of this, land allocations should be kept to a realistic total that will provide the requirement.

Yours faithfully,

Henry Pankhurst
Chairman
Harrogate Civic Society