

Harrogate Civic Society  
Henry Pankhurst  
38 St. Clements Road  
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19<sup>th</sup> August 2017

Local Plan Consultation  
Planning and Development  
P.O. Box 787  
Harrogate HG1 9RW

Dear Sirs,

Harrogate Civic Society Response to District Local Plan  
Additional Sites Consultation July-August 2017

1.1 The intentions of the Local Plan are laudable, but in some respects it is not really evident in the Draft Plan as written. *'....it will look to facilitate new infrastructure provision to ensure that development is sustainable' 'This might include new transport measures....'* Considering the constraints of the road network and that legal agreements with developers can only ensure that their contributions account for the extra traffic generated by their particular development, there is not much hope of ever improving the situation of traffic congestion and pollution by Local Plan Policy. This is especially true because the calculation of homes required is in no way related to the capacity of the roads that exist or that there is any real prospect of significantly improving in less than decades – perhaps never. A road can be pronounced as being at or over capacity but does it make any difference to developments along it or affecting it? It seems not.

*'Finally the new Local Plan will look to protect and enhance our high quality natural and built environment.'* The built environment is likely to receive better treatment than the natural environment as a result of policies in the Draft Local Plan. Unfortunately the general principle seems to be that development limits shall be allowed to encompass new housing allocations or permissions, rather than first deciding if there are acceptable opportunities for extending the towns and villages. Natural environment that was thought to be high quality is in many cases simply downgraded to suit the building site. Special Landscape Area is a very flexible thing! The goal posts are so easily moved. Is the recently raised housing requirement of 669dpa actually needed for the indigenous population of the Harrogate District? Cannot the Council choose a figure that more reasonably reflects what the District can bear without being transformed into a City that would gradually be less attractive to our important tourist trade.

**SITE H2**

This site has to be considered in the context of Sites H69 & H87 all three of which are an incursion into SLA to the North of Harrogate and together have a potential yield of 193 dwellings.

### **SITES H22 & SITE H23**

These sites along with H21 H3, H47 & H48 represent an overlarge incursion into the Bilton Triangle.

### **SITE K23**

This small site has to be considered alongside K21, K22, K24, K32 & K37 – another cluster of greenfield sites that will make a major difference to views and traffic on the northern perimeter of Knaresborough. The A6055 Boroughbridge Road with its many bends with poor visibility is unsuitable for the extra traffic that will be generated.

### **SITE PN 17**

This site is unsuitable for housing. The rise and fall of the land would make any dwellings highly visible and damaging to the Special Landscape Area (SLA). The area is of such quality that it is equal to that of our AONB in landscape value.

Footpaths that are well used would have much reduced amenity value. Houses on this considerably undulating land would be very dominant. When visible from lower ground, the dwellings, rising up from Clark Beck, could not be screened and each successive roof top destined to give the impression of an urban housing estate.

### **A Relevant Planning Decision**

We note that a planning application for 22 dwellings off Rossett Green Lane was refused permission and dismissed at appeal (Ref: 16/02825/OUTMAJ). These dwellings would have been on highly visible and rising land to the north of Clark Beck. The reason for refusal was that there would be substantial adverse effects on the landscape character of the SLA, also that there would be an adverse impact on the recreational value of a right of way. The reasons why this proposal was found unacceptable apply to the proposed allocation PN17 but perhaps more so. The overall density proposed for application 16/02825/OUTMAJ was 6.67dph BUT for PN17 the potential yield on the gross site area would give 22.28dph and for the net site area a density of 29.75dph. Any mitigation on this sloping rural site in the SLA would be impossible, which was said in the officers' report regarding the above quoted refused application. The conservation and design officers opinion noted that the application site provided an important break between Harrogate, Pannal and Burn Bridge. Considering the much greater density of PN17, there can be no doubt of the unacceptable damage that would be caused to the SLA – more damage than application 16/02825/OUTMAJ.

### **Pannal Conservation Area**

The setting of the Pannal Conservation Area would be adversely affected where the northern part meets Spring Lane and Church Lane. Currently the view is completely rural westwards from these locations and northwards until the Rossett area of Harrogate is reached. PN17 is bounded on its southern edge by a substantial hedgerow on Spring Lane, any damage to which would be unwelcome in itself, but have an adverse effect on the Conservation Area.

### **Traffic and Access**

It is inevitable that damage to the hedgerow would occur at some point because of the need for vehicular access. As there is no verge on Spring Lane, the length of hedgerow removal would be unacceptably great in order to allow the required visibility splays. Even the poor

state of Spring Lane is an advantage to the rural feel. Should this road be repaired to a high standard including added signs and road markings an uncharacteristic urban landscape would be created along with the not particularly low density housing estate.

The visibility for traffic exiting Westminster Drive onto Spring Lane is very poor. A new housing estate that PN17 would be is bound to increase the hazards of this junction. Spring Lane is not a suitable road on which to encourage additional traffic.

**Please read these comments on PN17 along with the following joint comment on PN17, PN18, PN19 & PN20.**

### **SITES PN17, PN18, PN19 & PN20**

These three sites are an unacceptable incursion into the Crimple Valley SLA. For decades, the Council has largely protected this area. We do note however the approved planning application to expand the Mercedes car showroom site further northwards, to which we objected. How much stronger then must be our objection to these three large sites – PN17 & PN19 for a total potential yield of 349 dwellings etc. and PN18 for over 18ha of employment land. To the south of PN19 is PN20 for Primary School expansion to which we do not have an objection if this capacity is currently needed, rather than due to the unacceptable development that would result from the potential housing sites, PN17 and PN19. How does the allocation of PN20 arise?

Sites PN18, PN19 and PN20 effectively ensure the coalescence of Pannal and Harrogate. The Mercedes showroom with the new extension joins with PN18. The A61 is a most important entrance into Harrogate and should not become a ribbon of development. The setting of Harrogate would be seriously compromised.

The Local Plan Inspector for the Local Plan 1991-2006 was very supportive of the Crimple Valley SLA Policy C9d. Only in two instances did he recommend the exclusion of small areas of land from the Crimple Valley SLA. (paras 2.24.3 & 2.25.5). The Council did not accept the Inspector's conclusion in the first case and retained the area within the SLA (Proposed Modifications of September 2000 pages 20-21 – "No modification").

In the second case, the Council agreed that two fields should be excluded from the Crimple Valley SLA (Proposed Modifications of September 2000 p.21, modification 38).

The Local Plan Inspector went into considerable detail regarding Proposal R6 – Relocation of Existing Major Sports Clubs. Prior to the Inquiry, the policy was changed to refer solely to the relocation of Harrogate RUFC. His report is contained in section 7, pages 42-48. At para 7.29.72 his recommendation was that Proposal R6 should be deleted. In paras 7.29.47 - 7.29.51 he gave account of all the negative effects on the SLA, which included the Setting of Harrogate, the openness of views, the incursion into the landscape, intrusiveness and a significant reduction in the apparent separation between the built up areas of Pannal & Harrogate. He also regarded the setting of the listed Crimple Valley Viaduct (an important feature in the landscape and a structure of historic significance) as worthy of protection.

**The Council agreed with all the Inspector's reasons and proposed deletion of Proposal R6 (Modification No. 265 on p.155 of the document noted above).**

What more is there to say, except that Sites PN18 & PN19 would cause much more damage to this southern approach to Harrogate than relocation of the RUFC, which would have been

on one side of the road only and would have covered far less land and been much less intensive a development.

**Is the Council now to overturn all that it previously held as important?**

We are pleased to see that Site PN16, the Gypsy & Travellers allocation has been deleted and replaced with three small sites K40, K41 & K42.

**Please read these general comments on PN17, PN 18, PN19 and PN20 along with the foregoing comments specifically regarding PN17.**

**SITE H27**

Recently a 98 room hotel has been given planning consent on appeal on part of this site (ref: 15/04361/FULMAJ). Should this area be considered either an employment commitment or deleted from H27?

**SITE FX5**

This site was part of FX3, an option for a new settlement, in the Draft local Plan of October 2016. **FX3 was our preferred site for the new settlement.** Perhaps this land could revert to being a portion of a new settlement if Green Hammerton does not find favour as it passes through the Local Plan process.

**SITE PN18**

We strongly object to this employment site as explained under the joint heading of PN17, PN18, PN19 & PN20, because of damage to the Crimple Valley, which was until now held in high regard for its natural beauty and contribution to the setting of Harrogate and the listed viaduct etc.

**SITES H49 & H70**

The many draft allocations to the south west of Harrogate already constitute development overload, considering that much of the land was SLA and that housing development will be into the thousands. The extensions, to the above two sites, amount to an additional yield of 101 dwellings. The many dwellings and large employment areas etc. already built and yet to come amount to a new settlement. Harrogate and Beckwithshaw are fortunately separated by the Green Belt but will join if the small area of land, unallocated, north of Otley Road and west of the extended H49, were to be encroached upon for building. The proposed extension of Site H49 is one further step towards coalescence of Harrogate and Beckwithshaw, to which we object.

**BM4**

We have noticed many planning applications coming forward for Bishop Monkton recently. This site now represents a large increase in dwellings in itself and especially along with BM2. These amount to 86 dwellings altogether. Bishop Monkton is only designated a Secondary Service Village.

**SITES K40, K41 & K42**

The three sites, two on Cass Lane and one at Thistle Hill for Gypsy & Traveller sites seems a sensible arrangement and preferable to the deleted PN16.

**GH11**

Green Hammerton was not our favoured site for new settlement. In our response to the Local Plan Consultation last year, we noted that FX3 had a greater potential yield of homes than G11. FX3 also had a favoured employment site adjacent. We therefore ask that GH11 is deleted from the draft plan. **The part of FX3 that is now FX5 should revert to being included as part of a new settlement.** Can we hope that the addition of a new settlement will ensure that other housing allocations will be deleted from the plan?

Yours faithfully,

Henry Pankhurst,  
Chairman  
Harrogate Civic Society