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5th January 2018.

Planning and Development,
For the attention of Gerard Walsh,
Harrogate Borough Council.
P.O.Box 787,
Harrogate.

Dear Sir,

Planning Application 17/05136/FULMAJ
Spring Lane Farm, Yew Tree Lane, Harrogate.

We wish to register our strong objection to the development of this site for housing. The Draft Local Plan in the Additional Sites Consultation of July/August 2017 allocates this site (Ref: PN17) for 72 dwellings. We sent representation through the Local Plan process to indicate our opposition to the allocation. This opinion must still be valid, even though the proposed development at 52 dwellings is less intensive than that indicated in the Additional Sites Consultation.

Several points regarding overall planning strategy must be considered.

HOUSING SUPPLY IN THE DRAFT LOCAL PLAN

The Council, in the Draft Local Plan of October 2016 at para 10.19 indicated that the provision of new homes needed to be an average of 557 per annum. In our response, we considered that this figure could be achieved even with a considerable number of deletions of proposed allocations. Some of these we listed, but confined our suggestions to the Harrogate area rather than the whole District. Even the figure of 557dpa is considerably greater than that needed to meet natural population growth and movement, which was assessed at 413dpa in the SHMA.

We then had a revised forecast of 669dpa, resulting in the Additional Sites Consultation. It is not at all clear to us why this sudden and drastic increase of building rate is thought to be necessary. The most recent Government opinion is that 395dpa would be sufficient. How then is there such a massive disparity between our Council and the Government? Surely there cannot be justification for the 669dpa figure, even if HBC accounted for a *modest* growth in need that Government could not see. The Council will of course be keen that the Local Plan is not found unsound but the predicted need seems quite extraordinarily large compared with previous calculations. Site PN17 allocated for housing in the Draft Plan has not yet been tested by an Inspector in a public examination and could well be found unsuitable or unnecessary as a housing allocation. The Plan is at an early stage.

THE 5 YEAR SUPPLY OF HOUSING LAND

The Harrogate District is said to be unable to provide this at present. Whether this is true or not depends on the dpa figure being used. It is very easy to fail in this supply if the dpa is jacked up far above the Government figure of 395dpa or the lower SHMA figure of 413dpa to the current calculation (!?) of 669dpa. Although the 5 year supply figure is important, it does not necessarily override **all** other factors in a planning decision. For instance, the Appeal by the Duchy of Lancaster regarding 165 dwellings off Cornwall Road was recently dismissed due to adverse effects on the SLA. We see also that an Appeal has been dismissed recently at Hornbeam Park/Hookstone Road for a development of 89 dwellings etc., despite the 5 year supply situation. Other good planning reasons for refusal can apply.

It is most unfortunate for our District that applications for thousands of dwellings have been approved but not yet built. A planning authority should not be held to ransom in this way and legislation is required to provide sanctions for developers that are slow to build. Authorities can feel forced to give undue weight in favour of applications due to the 5 year supply situation and decide in favour of sites that otherwise may have, for good reasons, been refused permission. The lack of 5 year supply card is being played by developers in so many cases where there should be no justification.

THE CURRENT APPLICATION

This site is unsuitable for housing. The rise and fall of the land would make any dwellings highly visible and be damaging to the Special Landscape Area (SLA). The area is of such quality that it can be considered 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 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 current application, but perhaps more so. The overall density proposed for application 16/02825/OUTMAJ was 6.67dph. The yield on the gross site area of this application would give 16.4dph. Although this is a low density it is much higher than for the refused application we mention, so adverse effects on the landscape for this reason alone are likely to be greater. *'Any mitigation on this sloping rural site in the SLA would be impossible'*, which was said in the officers' report regarding the refused application quoted above holds good for the current application. The conservation and design officers' opinion noted that *'the application site provided an important break between Harrogate, Pannal, and Burn Bridge'*. Considering the greater density and number of dwellings proposed in the current application, there can be no doubt of the unacceptable damage that would be caused to the SLA – more damage than application 16/02825/OUTMAJ.

The 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. The site is bounded on its southern edge by a substantial and valuable ancient hedgerow on Spring Lane, any damage to which would be unwelcome in itself, but also have an adverse effect on the Conservation area.

Traffic and Access

It is inevitable that damage to the hedgerow would occur because of the inclusion of a vehicular access point. As there is no verge on Spring Lane, the length of hedgerow removal would be unacceptably great in order to allow the required visibility splay. 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 housing development itself. Even with the two access points proposed, extra traffic on Spring Lane is unacceptable due to its narrowness. The visibility for traffic exiting Westminster Drive onto Spring Lane is very poor. A new housing estate is bound to increase the hazards of this junction. Spring Lane is not a suitable road on which to encourage additional traffic. Widening Spring Lane is not an option considering the ancient and valued hedgerow.

CONCLUSIONS

The application cannot be considered acceptable simply because the site has been allocated in the Draft Local Plan at Ref: PN17. Even if the 5 year housing land supply has not been fulfilled this cannot by itself be a deciding factor to approve the proposal. The application is damaging to the SLA and the Pannal conservation area and the important hedgerow. Spring Lane is a narrow road and unsuitable for increased traffic both vehicular and pedestrian.

THE APPLICATION SHOULD BE REFUSED.

Yours faithfully,

Henry Pankhurst
Chairman
Harrogate Civic Society