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17th January 2018

Planning And Development,
For the attention of Mike Parkes,
Harrogate Borough Council,
P.O. Box 787,
Harrogate.

Dear Sir,

Planning Application 17/05257/EIAMAJ
South of Penny Pot Lane, Harrogate

The above application for up to 350 dwellings is totally unacceptable.

HOUSING ALLOCATIONS

The Draft Local Plan includes housing allocations for a very large number of dwellings that is in our opinion far more than is required.

The most recent Government opinion indicates that 395dpa would be sufficient to meet natural population growth and movement. This figure is very close to the SHMA which assessed the requirement at 413dpa. The draft Local Plan of October 2016 at para 10.19 gave the need as 557dpa. A revised forecast resulted in the Additional Sites Consultation last year that drastically increased the projected need to 669dpa, the reason for which is not clear to us. To meet this, many unacceptable countryside and village locations were included. However, even the exaggerated revised allocations did not include this sensitive rural site as in the above proposal! Therefore the proposal cannot be justified, due to any lack of potentially allocated sites.

THE 5 YEAR SUPPLY OF HOUSING LAND

The Harrogate District is said to be currently unable to provide a 5 year supply. The higher the proposed dwellings per annum figure, the more problematic this will be! It is very easy to fail in the 5 year supply figure if the dpa is jacked up far in excess of the Government figure of 395dpa or the SHMA figure of 413dpa. To have reached the extraordinary figure of 669dpa as in the Draft Local Plan will, at a stroke, push any hope of a 5 year supply beyond reasonable attainment without serious damage to our District as we know it. In addition, the lack of a 5 year supply card is being played by developers in some cases where there is no justification in other respects. For instance, the Duchy of Lancaster proposal for 165 dwellings off Cornwall Road was dismissed at appeal due to factors that over-ride the lack of a 5 year supply. In the Harrogate District, proposals have been given for thousands of dwellings not yet built. The failure to build out these sites is bound to make the overall supply of housing look poor, but is the best answer to the problem for the Council to approve more and more applications? Legislation is required to provide sanctions for developers that unreasonably fail to build.

THE CURRENT APPLICATION

The site is in open countryside, which is designated a Special Landscape Area (SLA) under Saved Policy C9g –The Oakbeck valley. It also impinges on Saved Policy C10a – the Green Wedge – Oakdale Valley. A housing estate of 350 homes in this location would be largely disconnected from the urban area of Harrogate. It is not a brownfield site or an infill site or a reasonable extension to the town. It projects into valued countryside and appears an almost isolated development – free to and from wider rural views on three sides. The only point of contact with urban development is to the north of Penny Pot Lane. In this respect, there is a similarity with the Cornwall Road proposal noted above which was also pushing out into valued countryside designated SLA and free of urbanisation on three sides. The Queen Ethelburga’s site became a housing estate because it could be considered brownfield. The large housing site to the west of it, not yet built, at least has existing brownfield development to the north, east and west of it. A rather extreme case of infill you might say! The same cannot be said of the current application site to the south of Penny Pot Lane.

TRAFFIC

We do not believe that Penny Pot Lane should take the additional traffic that this proposed housing would throw onto it. It is to be remembered that the consent for about 600 houses etc. to the north is at an advanced planning stage and the effect of vehicular movements due to the estate is yet to be experienced. It must be significant on Penny Pot Lane as the only access point is to be on this road. The narrowness of the road at Oakdale Bridge and the steep gradients and bends make it unsuitable for additional traffic especially in winter conditions. The fact that traffic lights are necessary, even with light traffic, is significant. The traffic lights will also ensure more delays when traffic from the approved development of 600 houses etc. is built, which would be added to significantly by this application if approved, despite a second access point on Oaker Bank.

CONCLUSIONS

This proposal would cause significant damage to the Special Landscape Area, a much valued area of countryside. Even though the Council has seen fit to allocate large areas of greenfield land for housing in the Draft Local Plan, this site is not included. Consents for housing in the District are running at a high level. Even if a 5 year supply of housing land cannot be shown (at the currently supposed very high rate of 669dpa) consent for 350 dwellings on this large site in the open countryside cannot be justified.

For the above reasons, the application should be refused.

Yours faithfully,

Henry Pankhurst
Chairman
Harrogate Civic Society