Harlow and Pannal Ash Resident’s Association (HAPARA)

Application no 22/00089/EIAMAJ Windmill Farm, Otley Road, Beckwithshaw

Initial comments / objections 28 April 2022

HAPARA notes that this site, under reference H49, is included in the adopted Local Plan with a total yield of 776 dwellings. The Local Plan requires the application to be prepared in accordance with a West Harrogate Parameters Plan (WHPP).

1. Should this application come to committee before the WHPP is finalised including the detailed Infrastructure Delivery Schedule (IDS), the matter should be deferred until the final WHPP is adopted.
2. The application for 770 dwellings only covers part of the site. Further applications are expected for 40 self-build plots and for the land known as the Eddington Land which could yield up to 100 dwellings. The total for site H49 would then exceed the Local Plan provision by 134 dwellings or 17%. We say this is excessive, both in quantum of dwellings and site density (37 dwellings per hectare). Such densities relate poorly to the character and amenity of the area **(Policy HS1)**.
3. Due regard should be paid to the site being within the Crimple Valley Special Landscape area. A development of the density proposed would adversely affect the high-quality landscape of the area, being on the rural approach to the town, and the important setting of the RHS Harlow Carr Gardens visitor attraction. **Policy NE4 and draft WHPP** (‘The site’s relationship with the existing context ..’ pages 11, 27 and 28)
4. There is little evidence of tree-lined streets throughout the development (**draft WHPP page 15 and NPPF paragraph 131**)
5. The area of land designated for self-build housing is wholly insufficient for 40 average-sized plots (0.1 acre). At most, it might accommodate 20 plots (2.5 % of 770 dwellings). It therefore fails to comply with **policy HS3**. The full site development of H49 would require a minimum of 45 self-build plots.
6. There is a lack of detail of public transport provision. No firm commitments are made in the application to the provision of a high-quality bus service to the application site, including costs, the level of service to be provided and any changes to the existing service 6 serving Pannal Ash. Until this is agreed as part of the IDS, it is not possible to show that the development can be considered sustainable. (**Policy TI4 and NPPF paragraph 112**)
7. In the absence of details in 6 above, no justification is given for the assumed 10% reduction in private vehicle traffic generation through transfer to bus and cycling (TA paragraphs 6.80 – 6.82). This would require approximately 100 trips per hour to transfer from both H49 and H45 and leave 90% of trips by private car. **Even if this level of transfer were achieved, it would be more than offset by generation from the 17% increase in dwellings over and above the identified need**. The development cannot therefore be regarded as sustainable. (**Policy TI1**).
8. Much more rigorous proposals need to be made to respond to the climate and energy emergencies. We agree that it makes no sense to approve the construction of housing with fossil fuel heating and lower than maximum insulation standards.
9. As a general point it needs to be recognised that the equivalent of a small town is being built on the western side of Harrogate. This application makes reference to the Parameters Plan, which we believe to be flawed in that it does not address the overall context of what is happening. It primarily concentrates on this site plus H51 and H49, but we believe this to be a very limited approach given all the other sites in the immediate locality that are being developed, or in some cases are nearing completion such as H46 (125 dwellings) and H74 (124 dwellings).

HAPARA may wish to make further comments on this application prior to determination.