

**Application Number: 20/01706/EIAMAJ Address: Land Comprising Field At 428984 452916  
Whinney Lane Harrogate North Yorkshire Proposal: Outline application, with access off  
Whinney Lane, for the erection of up to 224 residential dwellings and a new school with  
associated roads, parking, landscaping, drainage and open space (all matters reserved) -  
CUMULATIVE TRANSPORT ASSESSMENT SUBMITTED.**

**Third submission by Harlow & Pannal Ash Residents Association (HAPARA)**

**With Reference to Infrastructure Delivery Strategy (WHIDS)  
and Update to Infrastructure Delivery Schedule (IDS)**

1. Since submitting our second objection document on 18 June 2024, we were informed by the applicant that the Infrastructure Delivery Strategy (WHIDS) and Update to Infrastructure Delivery Schedule (IDS) had been published on the Council website on 25 June. Consequently, alongside specific references to the application, we comment more widely on the WHIDS and IDS and the supporting Cumulative Transport Strategy (CTS) as NYC have advised us that this is the only opportunity to do so.
2. The overriding conclusion that one arrives at upon reading through these documents is that there is little contained within the WHIDS that actually quantifies the overall effect of the various mitigations proposed, against the expected increase in traffic arising from the large West Harrogate sites. What is being proposed here is the equivalent of a small town and yet the report essentially states that there will not be a “*severe impact*” arising from the large developments, even though the then borough council was arguing as far back as 2011 that “*this urban expansion and other growth in the town will place additional pressures on an already busy network*”. The WHIDS derives from the Cumulative Transport Strategy and both of these reports have taken nearly two years to be published. Both are complex and lengthy. In order for the average resident to be able to comment on more than a thousand pages of material it would not be unreasonable to expect there to be an executive summary clearly laying out:
  - What the actual strategy is.
  - What the problems are. Existing and forthcoming as a result of the developments.
  - A quantification of the problems.
  - Mitigations being applied. Here it would help if diagrams that the average layperson can understand were used. As it is there are a lot of engineering diagrams which are not always easy to comprehend.
  - How these mitigations will help overcome the problems.
  - Timescales and costs
3. We would submit that, at a number of the locations assessed in the Cumulative Transport Strategy, the cumulative impact can indeed be regarded as severe, particularly:
  - i. Where traffic saturation levels are very high
  - ii. On existing narrow sections of road where traffic levels are forecast to increase significantly.which should be considered as grounds for objection.

4. In relation to (ii) above, this leads to unacceptable risks for highway safety, in the increased hazards for pedestrians along roads with sub-standard or no footway provision. The resultant situations will give rise to pedestrian routes which are unsafe, insecure and unattractive (NPPT paragraph 116). We consider that the lack of mitigation measures to address these impacts are grounds for objection.
5. Yet here we are more than a decade on from the start of the Local Plan, having gone through two iterations, we are left with a series of proposals that will move the traffic along but not actually reduce it. Nothing bold on the public transport front is being proposed and Park & Ride seems to have been dropped. In relation to Phase 3 of the Otley Road Cycle Path, the CTS and WHIDS contain no evidence that the impact on the increasing levels of traffic along the road will be any more than minimal.
6. In addition, problems are recognised with other elements of infrastructure, such as schools and medical facilities but we are told that we will have to make do with what we currently have for a number of years.
7. When reading through the report dated 24 June 2024 that was submitted to the Executive Member for Open to Business reference is made in Para 2.2 of 2000 new houses. This has been a bone of contention between various stakeholders and NYC (and previously HBC). In reality nearly 4000 houses are being proposed and whether they have been, or will be, built does not lessen the demands that will be placed on the overall infrastructure. It is appreciated that the WHIDS and IDS cannot be applied retrospectively to sites that have been granted planning permission, or like H46 is nearly completed, but the demands placed upon all elements of infrastructure still remain. If these documents are only based on the figure of 2000 houses, then a significant underestimate has been applied. The reports seem to make no direct mention of this matter.
8. Para 3.3 of the 24 June report refers to “*collaborative working across a variety of stakeholders*”. This has been another bone of contention. Since the Parameters Plan (PP) project started and throughout the consequent work we, as stakeholders, have only had a handful of Teams meetings and one drop-in session at the Civic Centre last year. They have certainly not been collaborative. Compare this to the scores of meetings that have taken place with the developer. Yet to read Para 3.3 one would imagine that an exemplar of communications has taken place. The statement gives the impression that these documents have been agreed by the stakeholders involved, when in reality this is far from the case.
9. Para 1.2 of the WHIDS refers to ‘significant mitigation requirements for the improvements of key highway junctions and highway links. But nowhere in the report does there appear to be any sort of analysis provided as to what “*significant mitigation*” actually means. In fact, this lack of any tangible cost/benefit analyses permeates both the WHIDS and IDS. Nowhere do they clearly state what the problem actually is, what options have been considered, why a particular solution is to be applied, and what benefits will be achieved.
10. It is interesting to note that a budget in excess of £1.8M has been allocated to Phase 3 of the Otley Road Cycle path, whilst a sum of £1.5M is shown to enable pump priming of extended bus services. Given that there seems to be universal agreement that a good public transport proposition will help to take traffic off of the road, then we would have expected a more generous allocation towards buses. Certainly, more generous than that being applied to a cycle lane. What is being proposed for Phase 3 is a two-way shared cyclist/pedestrian facility, which is hardly going to offset the additional traffic expected to result from the major sites along the Otley Road. Surely it would make more sense to cancel Phase 3 and reallocate the monies to further pump prime truly enhanced bus services. Instead, what is being proposed is an extended bus service, that will take in the new sites when they have been built on. So, it seems that overall the bus service/s will actually take longer. The outcome of this will be people carrying on using their cars.

11. In as much as there is a strategy, it seems to revolve around a number of mitigations being implemented along the length of the Otley Road and the parts of the road network that will take traffic to Burn Bridge, or through Pannal, and onto the A61. Both of these are already very busy routes and it is hard to see that these mitigations will do anything other than just move the traffic along to existing congestion points such as the Prince of Wales roundabout. Nothing will really improve, since the traffic will only be held up at different points of the road network. There is nothing in these reports that provides convincing arguments that things will not get worse on the infrastructure front. In fact, the 24 June report states that things will further deteriorate. One cannot get away from the fundamental point that the West of Harrogate urban expansion equates to the equivalent of a small town, yet the infrastructure does not really exist. Again, contrast this with the approach that is being taken at Maltkiln.
12. It is disappointing to note that the reports state that services such as schools and GP facilities will be under increased pressure and that any alleviation will not take place for some years. In other words, it will be `make do and mend` with whatever existing levels of service currently exist.
13. No reference is made in these reports to Park & Ride, yet there have been countless studies carried out. It would appear that this idea has now been dropped.
14. Everything in these reports seems to be aimed towards planners and traffic experts and after two years it would not be unreasonable to expect a more resident friendly document to be included, longer if one also includes the PP. We therefore feel that some sort of executive summary is needed which summarises the key points of all of this work. After all we as residents will have to live with the mess and inconvenience for the coming decade, and possibly beyond, so it is not unreasonable to expect that the summation of all of this work will deliver tangible benefits.

Harlow and Pannal Ash Residents' Association