



Campaign for Sustainability of Development

November 2020

Statement

We would like to see that any developments in this area are exemplars of the way in which new housing addresses the net zero challenge of the next decades. We don't want the same old housing estates generating the same levels of traffic and the same levels of energy consumption.

The impact of traffic generated by large-scale development is a particular concern. All the communities we represent already experience severe congestion and the environmental and road safety problems from existing volumes of traffic. Effective measures are essential to address this and mitigate future increases.

We are losing precious open rural areas with high quality landscape value. We want to see that whatever replaces it is of a standard and character which addresses the issues of our time, and the quality of life for our community.



Site H70 Whinney Lane

Background

It is now a matter of fact that the Western Arc of Harrogate will be expected to absorb nearly 25% of the total Local Plan housing numbers (3500 - 4000 houses) leading to even higher levels of traffic, as many of the sites contained within this Plan will be highly car dependent. Even Harrogate Borough Council now use the term 'urban expansion' to describe this growth. This is a part of Harrogate with the very weakest road and transport infrastructure.

The Group

A number of organisations directly affected by the developments proposed for the Western Arc of Harrogate have been working together to produce this document. The organisations involved (collectively known as the Coordination Group) are:

- Haverah Park with Beckwithshaw Parish Council
- Duchy Residents' Association
- Hampsthwaite Action Group
- Harlow & Pannal Ash Residents' Association
- Harrogate District Cycle Action
- North Rigton Parish Council
- Pannal & Burn Bridge Parish Council
- Zero Carbon Harrogate

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The document is presented in three sections.

- Section 1:** Housing numbers
- Section 2:** Traffic issues
- Section 3:** Green /low carbon issues

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Section 1 Housing Numbers

The main arguments in this section are (a) that the Local Plan provides for too many houses compared to the assessed housing need, and (b) that the Western Arc of Harrogate is bearing too much of the burden of this provision.

Scale of housing developments

Whilst the objectively assessed housing need for Harrogate District is 13,377 dwellings, the Local Plan provides for 16,077 dwellings - or 20% more - over the period up to 2035, and the Western Arc of Harrogate is expected to absorb nearly a quarter of it.

Harrogate Borough Council (HBC) now refers to the development of the Western Arc of Harrogate as an 'urban expansion'. Given its scale, the Western Arc expansion should always have been treated in the same way as the proposed settlement near the A1, with a comprehensive approach to planning and infrastructure, not as a series of individual sites. A Parameters Plan may go some way to addressing this concern.

Too many houses?

A miscalculation by HBC led to the total housing requirement for Harrogate District being reduced from 14,049 to 13,377 dwellings. Even after the discovery of that error and an instruction from the Local Plan Inspector to reduce the number, the Council continued with the same Local Plan provision, resulting in the overprovision rising to 20.2%.

This 'flexibility' (or overprovision) is justified by HBC on the grounds that some sites may fail to come forward or are delivered with reduced yields. **Our view is that this overprovision is excessive.**

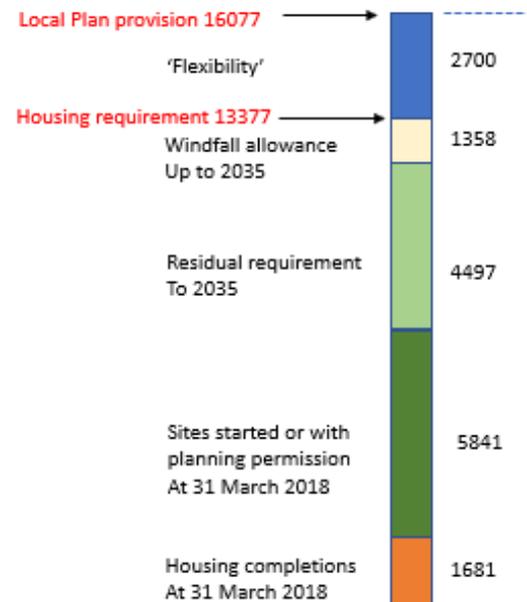
In his report the Inspector commented 'I find little merit in the argument that one should forever expand extant settlements' and '**infrastructure constraints limit growth or where expansion would come at the expense of, for example, unacceptable landscape or heritage harms**'.

Planning Creep

Developers are consistently applying for more dwellings than the yields indicated in the Local Plan. Over the Western Arc, this amounts to an average 'creep' of 14.2%. Given the excessive provision within the Local Plan as it stands, allowing developers to increase numbers on each site would further exacerbate the overprovision.

The Local Plan consultation invited comments on specific sites with indicative numbers of dwellings. Developers are now revisiting these sites with a significant uplift in numbers and the resulting extra impact on infrastructure, landscape, highways and environment. The Local Plan was meant to be a democratic process so, if the goalposts are now being changed, what was the point of this consultation?

Overdevelopment comes at a cost to the environment and carbon reduction targets. **We say that applications for development that exceed the Local Plan allocation for the site should be refused.**



Source: Harrogate District Local Plan 2014 - 2035. Table 10.77. Adopted January 2020

Note: Housing numbers as at 31 March 2018. Updated numbers for 2020 not available.

Example: Local Plan site H51	
Local Plan yield	Applied for (total)
690	790
Uplift	14.4%

Housing Density

Local Plan housing policy HS1 says that new housing development will be expected to achieve a minimum net density of 30 dwellings per hectare. Developers are using the argument that they have to meet this density and this increases the yields. However, the same policy allows lower densities when the character and amenity of the location are considered. **Sites within the Crimple Valley SLA must fall within that definition.**



Self-build and affordable housing

Policy HS3 dictates that, for sites of 500 dwellings or more, at least 5% should be given over to self-build. This would help to encourage building diversity, and possibly encourage people to build more energy efficient and low carbon housing. However, so far developers have been proposing sites that are just below the above total, thereby avoiding the requirement.

Policy HS2 deals with affordable housing which should comprise 40% of dwellings on greenfield sites. Developers argue that, to achieve a target of 40% affordable houses, they have to maximise the site yield so that the development becomes viable. The viability argument also figures when the requirement for adaptable homes (policy HS1) and provision for self-build plots (policy HS3) is included. **We remain very suspicious of claims of unviability unless verifiable proof is forthcoming.**

Homes for local people?

Policy HS1 refers to the need to build the sort of houses that people need, based on local assessments. We have long argued that the demographics of Harrogate, and the west side of Harrogate in particular, **demonstrates the need for single-storey dwellings to be in the mix, yet no developer is proposing to build any.**



Construction impacts

Construction activity is likely to carry on for the whole of the Plan period (15 years) and possibly beyond. There will inevitably be serious disruption for a protracted period of time. **Strict conditions need to be imposed, and rigorously enforced, to protect the amenity of existing residents while all this is happening.**

We urge a commitment to off-site prefabrication. Homes or components constructed off site in stable conditions are drier, quicker to erect, and minimise construction traffic, road closures, on-site noise and dust pollution for local residents.



Sustainability imperatives

We urge the planning authority and developers to ensure that houses are **built to the highest environmental standards.**

See section 3 (Green and Low Carbon issues) for a fuller explanation of this

Future changes in planning policy

The Government proposes to change the current planning rules, in order to 'speed things up'. It appears that housing numbers will be imposed upon local authorities by Central Government. Whatever one thinks of this approach, the indications are that such an imposition would result in a figure approximately **9% lower** than the current housing need assessment. If this is so, it is not inconceivable that, with the same headline number, the overprovision could be in the region of 32%.



Section 2 Traffic issues

The main arguments in this section are (a) that the scale of traffic generation from the urban expansion on the west side of Harrogate is probably underestimated, (b) that the infrastructure on the west side of Harrogate is wholly inadequate and (c) that the ability of sustainable alternatives to the car to relieve the pressure has not been demonstrated.

Scale of the problem

Section 1 describes how the Western Arc of Harrogate is expected to absorb nearly a quarter of the total Local Plan housing provision. This in a part of Harrogate with an acknowledged weak infrastructure. A total of 3,500-4,000 new dwellings means that we could ultimately be absorbing over 6,000 additional cars, 2,500 of which would be on the road in the peak hour.

There will also be over 5 hectares of commercial development which will introduce even more traffic onto narrow and hitherto quiet country lanes.

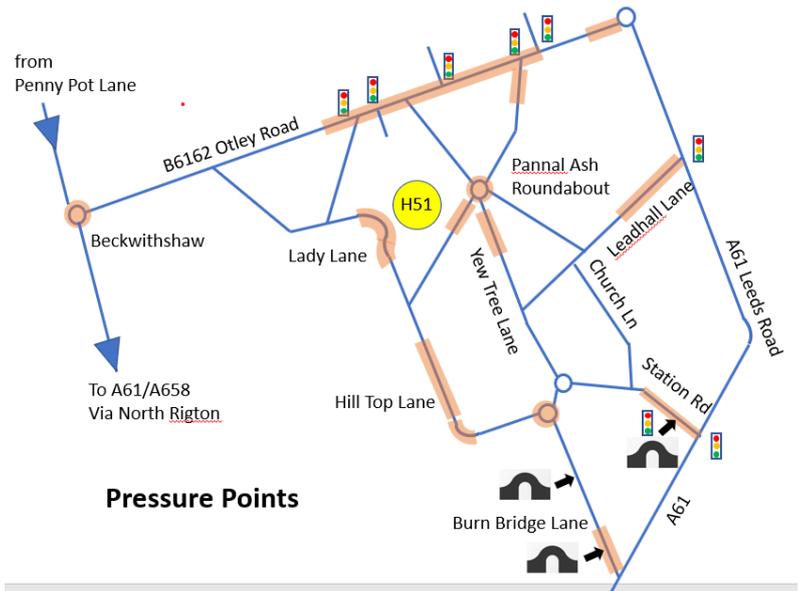


Western Arc developments shown in blue

Pressure points

One only has to look at the following pressure points, a number of which are already running at or above capacity, then add the effects of the 'urban expansion' resulting from the huge increase in housing, and then add the effects of the business sites and three new schools, to realise that there needs to be a significant improvement to the local infrastructure plus a good public transport provision.

- B6161/ B6162 Beckwithshaw roundabout then onwards to North Rigton
- Otley Road all the way down to the Prince of Wales roundabout
- Lady Lane
- Whinney Lane
- Hill Top Lane and Hill Foot Lane
- All five arms of Pannal Ash roundabout
- Leadhall Lane onto the A61 Leeds Road
- Station Road, Pannal onto the A61 Leeds Road
- Burn Bridge Lane onto the A61 Leeds Road



Pressure Points

Significant infrastructure improvements at all these points will be required to enable this urban expansion to proceed.



Burn Bridge

Reliability of the traffic data

Much of the traffic data used for the Local Plan is several years old and some goes back to the 2011 census. There are strong indications that the data used do not reflect current levels of traffic/trip rates. It is almost certain that travel patterns, trip rates and destinations will change significantly over the period of the Local Plan, with a consequential impact on the pressure points identified above.

We are campaigning for up-to-date traffic modelling which takes account of potential changes in travel patterns.

Otley Road



Local Plan mitigation measures

The current Infrastructure Delivery Plan (Aug 2018) lists:

- Two junction improvements on the A61
- Crag Lane/Otley Road (now installed)
- An extension of bus services (unspecified)
- Cycleway provision (unspecified)

Since then proposals have been announced on:

- An Otley Road cycle path
- Widening of the Harlow Moor Road/Otley Road junction
- A number of smart traffic lights

Pre-pandemic Otley Road operated at or near capacity in peak hours. Whilst some benefit will be gained through traffic light improvements, these will be modest.

The cycle path would need redesigning to comply with new Government standards (LTN 1/20). As it is, it will do little to reduce traffic on what is already a very busy road, at least until it is part of a fully developed cycling network.

We say that the mitigation measures as currently proposed will be wholly insufficient to tackle the scale of the problem. Significant extra infrastructure investment is required.

Sustainable modes of travel

The majority of sites on the Western Arc of Harrogate will be hugely car dependent. Cycling, which currently accounts for 2% of all trips, and pedestrian options are very unlikely to make a significant dent in the expected traffic increase, without a massive investment into a full cycling network.

Heavy traffic and the hilly terrain will act as a further disincentive to cycling as an effective solution to reducing peak hour traffic levels.

Policies in the Local Plan require all development proposals to minimise the need to travel. Importantly these policies say that the majority of future development should be located within key bus corridors or close to a railway station. **There is no key bus corridor within the whole area of the Western Arc** and very little of it is close to a railway station.

However a substantial investment in a cycling network in town is unlikely to alleviate traffic to and from the A61.

We want to see clearly defined proposals for public transport and cycling, quantifying the benefits.

Construction impacts

Some of the sites within this urban expansion are currently under construction, and construction activity is likely to carry on for the whole of the Plan period (15 years) and possibly beyond. There will inevitably be significant volumes of heavy vehicles using routes of variable structural and environmental quality. Already there is a weight of anecdotal evidence of the damage and disruption being caused by such heavy vehicles.

Funding for essential highway maintenance must be identified.



Sustainability imperatives

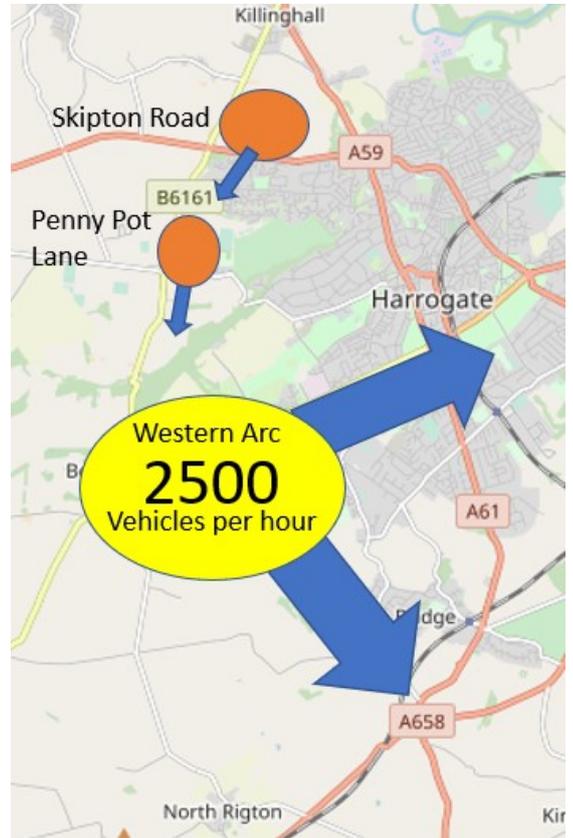
Travel and transport are key areas in which to achieve truly sustainable development. Proposals so far fall well short of achieving net zero carbon objectives by the end of the Plan period. **We want to see investment in infrastructure which recognises climate change imperatives, reduces congestion and improves the environment.**

See section 3 (Green and Low Carbon issues) for a fuller explanation of this

Handling the traffic generated from new developments

In October 2019, the NYCC Executive approved work on a review of a link between B6162 Otley Road and the A61 as part of the Harrogate Congestion Study. No findings have been reported from this review and this has left the known and accepted congestion problems unaddressed, including the compound effects of Western Arc developments. These are expected to generate up to 2500 vehicle movements per hour added to which will be traffic from new developments at Penny Pot Lane and Skipton Road.

Whilst it is possible that some journeys into and out of Harrogate from the Western Arc can be accommodated with sustainable transport, no such options are feasible for the orbital movements. So, in the absence of suitable and safe routes between the A61 and Otley Road, private vehicles, business and commercial vehicles will continue to find their own way, resulting in daily gridlock and deteriorating air quality on what can only be described as rat runs on country lanes.



The alternative route through North Rigton

North Rigton lies on a well-used rat run for traffic between the west side of Harrogate and routes to Leeds, Bradford and other destinations. The route is on unclassified roads with a poor safety record. Congestion on routes through Pannal and Burn Bridge leads to higher flows through North Rigton. Western Arc developments will significantly increase the pressure on this route. **We call for measures to improve the alternative routes between B6162 and A61 to protect this community.**

What is the answer?

The planned huge urban expansion including employment and schooling requires a major upgrade in highway capacity commensurate with the predicted increase in traffic.

We continue to press for further significant improvements to the road infrastructure that better reflects the needs of current and future residents on the Western Arc and those who need to travel to and from it.

We look to the Highway Authority to propose solutions to this on which we can be consulted.

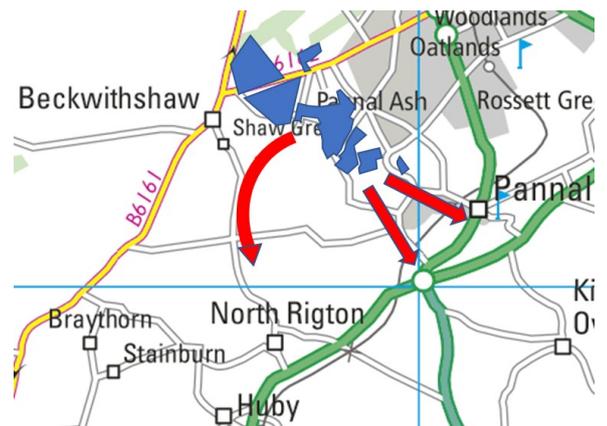


Main Street, Pannal



Left:
North Rigton

Right:
Routes to the south/
SW/SE



Section 3 Green and Low Carbon issues

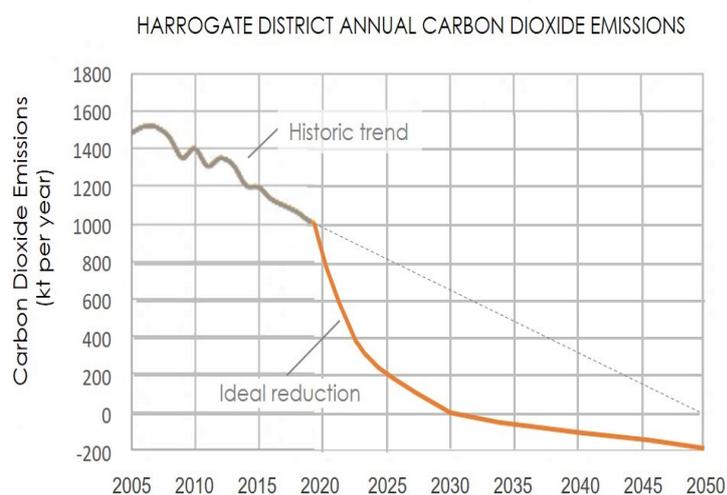
The main arguments in this section are about building a sustainable future and meeting carbon reduction targets: (a) low carbon dependency infrastructure across the new developments (b) new homes must be built to higher energy efficiency standards (c) new developments must be designed for a future powered by renewable energy.

The need for urgent action

After the current understandable focus of society on tackling Covid 19, the big issue that faces us all is how to live sustainably. How can we live in a way that benefits our environment and provides a secure home for future generations?

We are pushing for the District to be net zero greenhouse gas emissions by 2030. Ten years may seem a long way away, but as far as climate change and greenhouse gas emissions are concerned, it is a blink of the eye.

During this time **the transition to net zero requires urgent action if the target is to be reached.** Planners, developers and house builders have a huge responsibility to deliver this.



Design for journey reduction

Currently, 44% of Harrogate's carbon emissions come from transport and almost half of journeys made are less than 1.6 miles. **Design of new housing and access to services can significantly reduce car ownership and use:**

Adequate local services such as shops, cafes, doctor's surgery, schools and community buildings need to be included in the Parameters Plan to meet the needs of the 7,000 or so new residents so that additional car journeys are not essential.

Developers and homebuilders should be pressed to step up to best practice for low car developments such as at Derwenthorpe, York. For example, street design to favour pedestrians and cyclists, 20 mph speed limits, no through roads except for buses and pedestrians, bike storage, car clubs and electric vehicle charging.

Houses should provide home working space and attract occupants who would not need to commute.

Infrastructure for low carbon travel

As discussed in section 2 the 'urban expansion' is likely to generate thousands more journeys particularly at peak times unless adequate infrastructure is developed to provide alternatives. **Extensive improvements are needed from the Parameters Plan in the provision of bus routes, cycle and pedestrian routes, paid for by the developers.** Restructuring street space on key routes to the centre of Harrogate will be needed to make space for segregated cycle ways and dedicated bus routes.



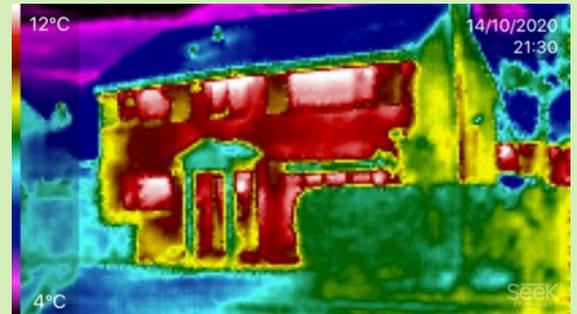
Part of the Parameters Plan should include creating **home zones in existing residential areas** to prevent increased rat running. Road pricing (except for residents) on roads such as Burn Bridge Road and Church Lane could be deployed to deter traffic.



Zero carbon homes - reducing energy demand of new-build homes

Current national planning policy and developers' plans take no account of the urgent need to reduce emissions. Domestic buildings account for 23% of carbon emissions. Many new builds do not even meet today's building regulations. When tested, new homes have on average 2.6 times higher energy inefficiency and CO2 emissions than expected.

Amendments to the Future Homes Standard Parts L and F, may demand around 80% more thermal efficiency from 2025. But many of the houses in the Western Arc will have been built by 2025. **House builders must be challenged to design, build and test to these better standards now.**



Thermal image of a modern Harrogate house, showing heat loss from the walls (red and yellow)

Embedded energy content of building materials

Many of the building materials used in the last 100 or more years have consumed a lot of energy in their manufacture, usually coming from gas, oil or coal. Bricks, cement blocks and cement are examples. These materials are typically delivered for use on-site.

We want to see more homes using materials which have much lower embedded energy. Such as timber. When growing, trees remove carbon from the atmosphere and it will not be released while a component of a properly built house. Timber also lends itself to off-site fabrication.



Timber clad/framed, low carbon homes in Harrogate District

We are campaigning for developers to appoint house builders committed to off-site prefabrication. Homes or components constructed off site in stable conditions are drier, quicker to erect.

Prefabrication **minimises construction traffic, road closures, on-site noise and dust pollution for local residents.** Factory built components can also ensure significantly higher energy efficiency.

New homes should not be built to depend on fossil fuels when it is perfectly possible to heat and light homes with clean, low carbon renewables. As a minimum, all homes should have solar panels installed, with battery storage technology. Heating new homes with gas will be banned from 2025. Instead electric, air source or ground source heating will be used, or a district heating scheme.

This needs to start now, otherwise **homes built in the next 5 years will all need to be retrofitted within 10 years.**

Developers sometimes argue that this increases the cost of the build and reduces their profitability. **We believe there will be a high demand for low carbon homes with minimal or no annual energy bills.**