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Harrogate Draft Local Plan – Additional Sites Consultation

This representation is made on behalf of Vernon and Co in relation to their land interests at Land off Rowden Lane, Hampsthwaite (sites HM4 and HM5).

Question 1 – Do you have any comments on the updated evidence base?

We note the increase in the housing requirement from 557 to 669 dwellings per annum in the last 12 months and are supportive of the increase. We do however consider that the increase does not go far enough and maintain our view that the housing requirement should be increased.

Further to our response to Policy GS1 in the November 2016 Draft Local Plan where we acknowledged the concerns highlighted by the HBF in relation to June 2016 SHMA Update, we are aware of the concerns highlighted by the HBF in relation to the Housing and Economic Development Needs Assessment (HEDNA) July 2017 which is the updated housing needs evidence base. We agree with the HBF's concerns relating to some of the assumptions used in the HEDNA which may suppress the overall OAHN, and continue to justify our consideration that the housing requirement should be increased. We agree with the comments made by the HBF and support their suggestion that the OAHN should be in excess of 850 dwellings per annum. The below summarises the HBF comments in relation to the updated evidence base and the resultant changes to the housing requirement.

- Welcome the use of the 10 year migration scenario;
- Maintain that an adjustment to the 2014 Sub National Household Projections (SNHP) Household Representative Rates (HRR's) should be applied to the wider age cohort of 25-44, rather than restricted to the 25-34 age cohort. Expanding the uplift to the wider 25-44 age group is recommended by the Local Plan Expert Group (LPEG);

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- Request for further clarity as to how the net increase of 12,200 jobs over the plan period has been translated into the Economic-led Housing Need calculation;
- Pessimistic jobs-growth forecasts when considering the past trends in Harrogate. We are supportive of the HBF consideration of the need for more aspirational jobs growth;
- Preference for the alternative economic activity rates provided by the Office of Budgetary Responsibility (OBR). The use of the OBR economic activity rates would require 785 dpa (table 19 of the HEDNA 2017);
- No further adjustments are made to the OAHN despite significant market signals relating to both market and rental affordability. We agree that a further upward adjustment is required.

Notwithstanding our comments regarding the housing requirement we would remind the Council that the housing figure is a target and should not be used as ceiling. With that in mind, it is important that the Local Plan takes a flexible approach to the allocation of land and allocates more than is required in order to maintain a choice of sites. We therefore consider that the Local Plan identifies a buffer of sites, over and above the requirement in accordance with the Framework requirement for plans to be positively prepared, boost significantly housing supply, and provide flexibility to deal with changing circumstances.

Question 3 – Do you have any general comments about additional housing allocations?

Vernon and Co wish to object to the additional proposed housing allocation of HM9 and remain disappointed that sites HM4 and HM5 have been overlooked and are not included within the additional sites in Hampsthwaite, as a single housing allocation. A copy of the proposed red line boundary for this alternative housing allocation is enclosed.

We object to the proposed allocation of HM9 as we consider that the development of this site would have a significant adverse impact on the character of the settlement, the landscape and Conservation Area.

Main Concerns with HM9

Background to Historic Environment

In order to properly consider the potential impacts of the proposed allocation upon the historic environment a baseline assessment has been undertaken of known designated and non-designated heritage assets in the vicinity of the site. This has included a review of National Heritage List for England (NHLE) entries and records held on the North Yorkshire Historic Environment (NYHER) and upon the National Record of the Historic Environment (NRHE). A

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review of historic Ordnance Survey (OS) mapping records has also been undertaken. Reference is also made to the Council's Conservation Area Character Appraisal (2009) for Hampsthwaite.

The settlement at Hampsthwaite was on agrarian foundations and is first recorded in the Early Yorkshire Charters from the 12th century although likely pre-dates this reference. The Roman road from Ilkley to Aldborough crossed the River Nidd at Hampsthwaite and likely formed the basis for the establishment of a market. This was granted a charter in 1304 and settlement was historically focused around the village green and developed in a linear form along the line of the current High Street and Church Lane. Mapping during the 19th century confirms the linear character of development extending southwards from the Church with a series of toft and croft division patterns indicated off the High Street and backing onto the proposed allocation site HM9. Areas of quarrying activity are shown to the south-west and west of the site. It is likely that the site formed part of agricultural common land during the late medieval and post medieval period. Based upon a 1km search radius from the centre of the site the NHLE holds 20 records, all listed buildings, falling within the vicinity of the site. These include the Church of Thomas a Becket (list entry number 1315374, Grade II) to the north-east and a number of listed buildings on High Street to the east; Laurel Cottage (1150413, Grade II), High Stores House (1315377, Grade II) and Mally's Cottage/Thompson's Garth (1173536, Grade II). The later form part of the linear historic core of settlement and fall within the Hampsthwaite Conservation Area.

The NYHER holds 9 records within the search area. These include one record with National Grid Reference (NGR) falling within the proposed allocation site (HM9), Earthworks at Hampsthwaite (NY SMR MNY13923). This comprises a probable enclosure boundary or building platform of uncertain date visible as earthworks on aerial photographs.

The NRHE holds 24 records within the search area. These include a Roman coin hoard find (monument number 51695) and evidence of medieval and post-medieval activity associated with the settlement. Within the site a small post-medieval quarry has been identified, visible as earthworks on historic air photographs and indicated on historic OS mapping (1584450). Also within the site is a possible post-medieval field boundary visible as a slight earthwork on aerial photography and indicated on lidar imagery (1584453). To the north and north-west of the site the NRHE holds records identifying areas of medieval or post medieval ridge and furrow and ditches visible as earthworks on historic air photographs (1584448, 1584445 and 1584444).

The Hampsthwaite Conservation Area was designated in 1976 with subsequent amendments in 1994 and 2009. The Conservation Area boundary extends to take in the linear historic development along High Street and Church Lane and areas of significant open space to the south-west and east of the Church. The boundaries adjoin the site, in part, to its northern section

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adjoining Elton Lane, and to the west although the extent omits the later residential cul-de-sac of Meadow Close.

The Hampsthwaite Conservation Area Character Appraisal was approved by the Council in 2009. It identifies the land to the south-west of the Church and immediately north of the proposed allocation site as an important open space. Manor Farm and the Joiners Arms are identified as local landmark buildings and buildings along High Street and Elton Lane are identified as buildings of local interest, these constituting non-designated heritage assets. The stone boundary walling to each side of Elton Lane is noted as an important boundary. Key views onto the proposed allocation site are identified from Elton Lane and from the High Street through gaps between buildings, most notably to the south of Greenside House. These views take in the wider agricultural landscape adjoining the conservation area and including the draft allocation site.

Potential Development Impacts

The proposed allocation site comprises part of the immediate landscape setting of the Hampsthwaite Conservation Area and provides evidential value in illustrating the agrarian foundation of settlement. The site is within an area illustrating medieval and post-medieval activity and long standing agricultural use. It immediately adjoins the Conservation Area boundary to the north and to the east and has visual connectivity with the historic core of the settlement. This connectivity allows for significant views towards and from the proposed allocation site onto the wider historic landscape setting and is prominent in views approaching the village from the west. As such it forms a strongly positive element to the setting of the Conservation Area and also to the setting of a number of listed buildings including the Church and Laurel Cottage on High Street, the latter immediately adjoining the boundary of the site. In addition it forms part of the setting to a number of non-designated heritage assets on High Street which currently share boundaries with the site and to the north of Elton Lane.

It is considered that, on an in principle basis, the development of the proposal allocation site will substantially diminish the historic landscape setting of the village and Conservation Area. As such harm will arise, regardless of layout response, to the significance of the Conservation Area and important views towards and from the area will be compromised. Similarly harm will arise to the settings of a number of other listed buildings and non-designated heritage assets.

It is also notable that, whilst the linear character of the settlement has been eroded to some degree by development at Meadow Close and Peckfield Close it remains strongly evident to the northern section of the High Street towards the junction with Elton Road and, to perhaps a lesser extent to the south between the two pockets of later estate development. In these areas the direct connection with the historic agricultural landscape is strongly positive. Development of the

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proposed allocation site will further diminish and undermine the historic linear pattern of development to the west side of the development. This will again give rise to harm to a range of heritage assets and to the overall morphology of historic settlement.

Given the proximity of the proposed allocation site to a range of designated and non-designated heritage assets, including the Hampsthwaite Conservation Area, and the clear positive contribution it makes to these assets, it is evident that development will inevitably give rise to harm. This harm, through the diminution of the landscape setting of the village and loss of significant views, is an in principle assessment which could not be mitigated or removed through layout response or landscape treatment.

Site HM9's Sustainability Appraisal acknowledges that the development of the site is likely to harm significance of heritage asset, it also acknowledges a negative impact on the local distinctiveness. However given the analysis provided above we do not consider that this can be mitigated through landscaping proposals or layout and that this location for development is inappropriate and more suitable alternative sites exist within the village.

Sites HM4 and HM5

Vernon and Co have recently submitted an outline planning application to Harrogate Borough Council for the residential development of up to 130 dwellings on land off Rowden Lane, Hampsthwaite, comprising of sites HM4 and HM5. We are currently awaiting validation on that application. We consider that this application site, of which the red line boundary is enclosed with this representation, should be allocated in the Local Plan.

An Illustrative Masterplan (attached to this response) has been carefully designed to retain the existing Public Right of Way (PROW) which traverses the site and in the north in an east to west direction, protecting and enhancing the amenity value of the PROW. The masterplan seeks to integrate the development proposals with the wider countryside by providing suitable landscape buffers and planting proposals across the site and ensuring continued connectivity.

The proposals seek to retain existing trees and hedgerows across the site, where appropriate, and include biodiversity enhancement opportunities through appropriate landscaping proposals including the strengthening of boundary planting and hedgerows where possible.

We have undertaken a landscape appraisal and analysis which has identified the baseline conditions and landscape character for the site. Existing planning policies, landscape character, and existing features have been reviewed, along with analysis of key views of the site, both in the immediate vicinity and over the wider area beyond the site.

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Hampsthwaite Conservation Area and the Nidderdale AONB are within close proximity of the site, however it is considered that the development will not affect the setting of these areas due to the visual containment of the site and the strong network of existing green infrastructure and boundary vegetation surrounding the site. The site is further away from the Hampsthwaite Conservation Area and Nidderdale AONB than the proposed allocation of site HM9.

Sites HM4 and HM5 represent a logical extension to the built form particularly when considered in the context of the consented and currently being developed site HM1 and the draft housing allocation of HM7. Furthermore the development of sites HM4 and HM5 provides for a holistic and comprehensive planning opportunity with draft housing allocation HM7 in order to provide significant social, economic and environmental benefits to the village.

We are aware of the draft site requirements for HM7 as part of the draft Local Plan. It is considered that the allocation of sites HM4 and HM5 could significantly contribute and aid in the delivery of such requirements for example safeguarding the existing PROW and providing safe and convenient connections to the wider countryside.

Notwithstanding our comments relating to the suitability of sites HM4 and HM5, Vernon and Co have concerns with the approach taken in the Local Plan to allocate a New/Expanded Settlement at Green Hammerton as a solution to meeting the housing requirement at the expense of a number of smaller sustainable sites on the edge of settlements within the District. Sites HM4 and HM5 are such an examples, where the sites are available now, located on the edge of a Primary Service Village and could start delivering houses in the early part of the plan period, unlike a New / Expanded Settlement which will take a number of years in plan making before development will actually commence.

We urge the Council to reconsider their approach and allocate site HM4 and HM5 for residential development.

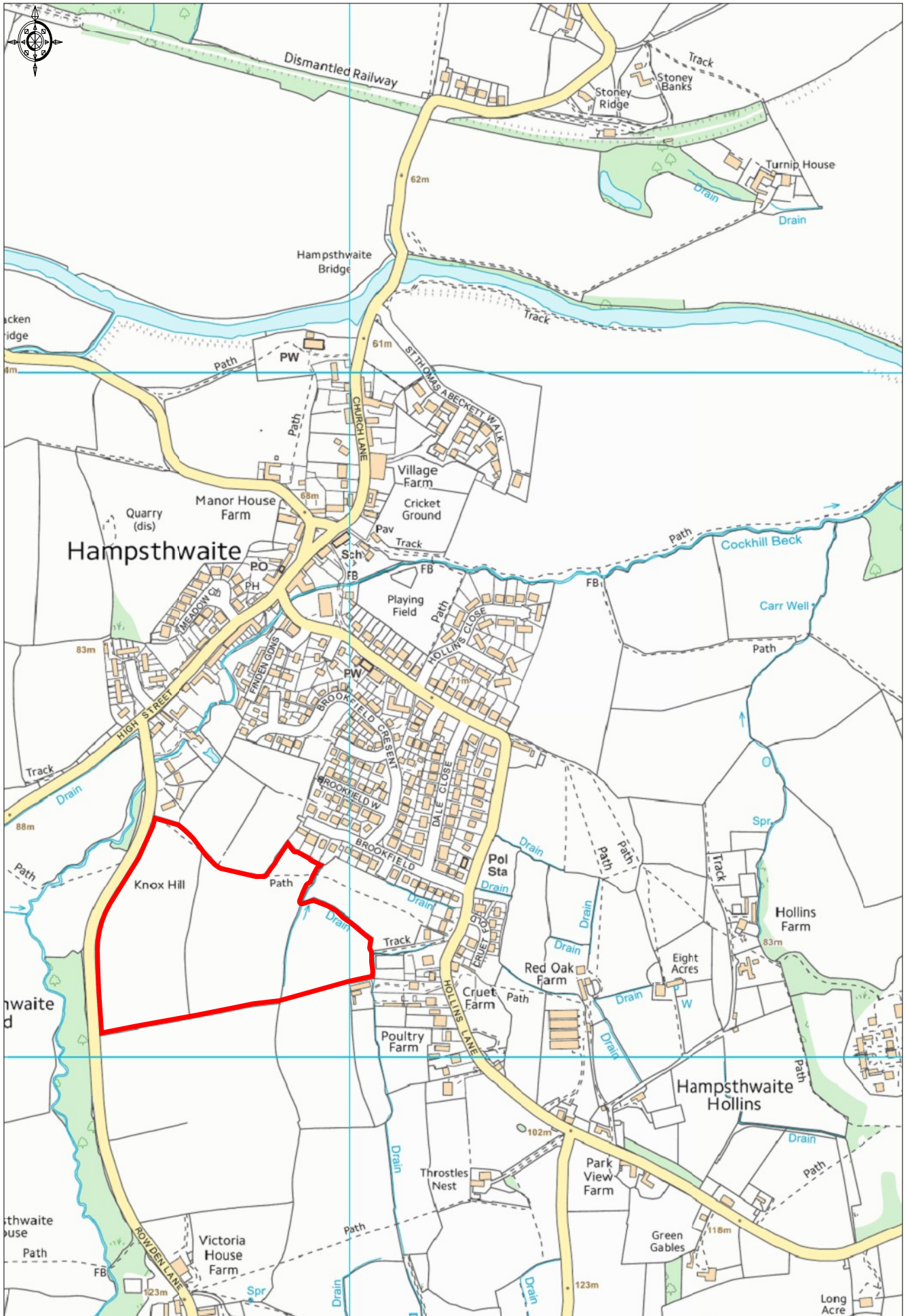
We look forward to being kept informed of the progress of the Local Plan.

Yours sincerely

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- 1 PRIMARY LOOP ROAD THROUGH THE DEVELOPMENT
- 2 SHARED SURFACE STREETS CREATE A PEDESTRIAN PRIORITY ENVIRONMENT
- 3 EXISTING PUBLIC RIGHT OF WAY
- 4 PROPOSED PLANTED BUFFER CREATES DEFENSIBLE BOUNDARY
- 5 EXISTING TREES/PLANTING RETAINED IN THE PUBLIC DOMAIN TO CREATE GREEN WAY THROUGH THE SITE
- 6 PROPOSED SUDS BASINS WITH AREAS OF GREENSPACE
- 7 ADJACENT DEVELOPMENT UNDER CONSTRUCTION
- 8 RIGHT OF ACCESS FOR AGRICULTURAL VEHICLES
- 9 PEDESTRIAN ACCESS ONLY

