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Zero Carbon Harrogate Response to Draft West of Harrogate Parameters Plan (WHPP)

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Summary response

We are grateful to Harrogate Borough Council for the opportunity to see an early copy of the WHPP and to comment on its contents. We regard it as an essential element of the planning process, given the major extension to the urban area that it covers.

However, we consider the current draft WHPP to be a major missed opportunity to create sustainable development, cutting across the Council's commitment to be carbon net zero by 2038. The document mentions 'carbon' only six times in its 155-pages, each time quoting from other sources. The need for design to address both climate adaption and mitigation has been ignored.

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A marvellous opportunity has been created to design this major extension of the Harrogate urban area in accordance with the Borough's own ambition to create a low-carbon, sustainable settlement, but there is a danger that it will now be lost. Not only has the Council set an objective to become net zero by 2038 (together with an even more ambitious target set by the County Council) but it has put in place clear policies in its local plan which, whilst cited, would appear to have been side-lined in assembling the outline masterplan and informing the key design parameters. We regard this as a fundamental gap; one which should underpin the whole planning process. We therefore request a vital reappraisal of the current draft to consider climate and sustainability aspects.

Whilst there are many attractive features of the plan, this major missing element necessitates a full re-working, which even the developer-partners of the plan have admitted (at the stakeholders meeting 20th January) should be 'beefed up'. This re-working should take into account the benefits to all, not least the new residents of the development, to enable low-energy, high biodiversity and sustainable transport to become key features of this new housing area.

We would strongly urge the Council not to adopt WHPP in February 2022 to allow for full consideration of the points we raise in this document and by other local stakeholder groups who have only just been consulted. We concur with the Western Arc Group in requesting that the WHPP is not approved until the West Harrogate Infrastructure Delivery Schedule has been fully spelled out. The totality of the impact of all development areas to the west of Harrogate, in addition to the sites covered in the masterplan has not been recognised. Additionally the draft Parmiters Plan as it stands does not address or attempt to mitigate the impact on neighbouring villages.

Key adopted policies and the necessary response

In the context of an urgent response to, mitigate for, and adapt to a changing climate Policies CC 3 and 4 of the Local Plan are fundamental to all local development. The more major the development, the more far-reaching are the opportunities that exist to promote sustainability generally, the opportunity to incorporate energy generation and the design for low-energy living. These policies are as follows (emphases with regard to WHPP are *italicised* in **bold**):

Policy CC3: **Renewable and Low Carbon Energy**

A. Renewable and low carbon energy projects, including incorporating small-scale renewable and low carbon energy generation into the design of new developments where appropriate, feasible and viable, will be supported provided that:

- i. The proposal does not have an unacceptable adverse impact on the landscape, the natural environment, biodiversity, the cultural environment, the historic environment, adjoining land uses and residential amenity; and
- ii. Appropriate mitigation measures would be taken to minimise and, where possible, address adverse impacts; and
- iii. The proposal avoids unacceptable cumulative landscape and visual impacts.

B. Proposals for wind turbine development, in addition to satisfying the requirements of Criterion A, must also, following consultation, demonstrate that the planning impacts identified by affected local communities have been fully addressed and, therefore, the proposal has their backing; and

- i. Be located in an area identified as being suitable for such use within a Neighbourhood Plan; or
- ii. ***For small-scale turbines (with a maximum height to tip of 25 metres): be directly related to, and generate power principally for, the operation of a farmstead, other rural business or a local settlement.***

Policy CC4: **Sustainable Design**

The council requires all developments to be designed to reduce both the extent and the impacts of climate change; it will promote zero carbon development and encourage all developments to meet the highest technically feasible and financially viable environmental standards during construction and occupation:

A. All developments are required to reduce carbon dioxide emissions through the following sequence of priorities, as set out in the energy hierarchy:



- i. Energy reduction; then*
- ii. Energy efficiency; then*
- iii. Renewable energy; then*
- iv. Low carbon energy; then*
- v. Conventional energy.*

B. The council:

1. Expects new developments to incorporate passive design measures that reduce the need for artificial lighting and heating, cooling and ventilation systems through siting, design, layout and building orientation.

2. Will support proposals to improve the energy efficiency of existing buildings that comply with all relevant aspects of this policy and other relevant policies in the plan.

C. All developments of ten dwellings or more, or 1000 sq m or above of gross floorspace, will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to reducing greenhouse gas emissions in support of the Harrogate Borough Council: Carbon Reduction Strategy (2018) (or any future relevant strategies) and the Climate Change Act (2008)

(Section D appears to be missing from final version of the Local Plan)

Non-domestic Development

E. New non-domestic developments, excluding conversions and extensions of less than 500 sq m, will be required to achieve a minimum standard of BREEAM 'Excellent' (or any future national equivalent).

We find it incredible that having recognised the importance of these policies in the 'Key Policy Considerations' section of Chapter 3, notably pages 23-24, the rest of the draft WHPP fails to build upon them, in terms of detailed master-planning considerations and the design strategy (page 91ff). Whilst the policy background provides sufficient justification for a full treatment of these issues, recent experience of UK climate change and the current energy crisis with the major price rises in gas and electricity only serves to underscore the significance of appropriate design solutions for new development.

We find the failure of WHPP to carry through the policy requirements of policies CC3 and 4 into proposals truly shocking, and consider that it totally undermines the validity of the draft plan.



Zero Carbon Harrogate's Four Key Proposals

Whilst it is not our role to bring forward design solutions, we feel it is necessary, given the absence of proposals to address the current context of the climate crisis, to bring forward some outline concepts that would be feasible and economically viable to implement, as long as these are incorporated at the master-planning stage. The longer they are left to one side, the more expensive, and potentially infeasible, it becomes to incorporate them.

We would want to stress that these are not new ideas, but rather matters that were fed into the early part of the WHPP development process in 2020, and again in 2021 when a meeting was held to consider transport issues. There are four aspects to our proposals.

1. Carbon Accounting

HBC and NYCC's adopted 'net zero' carbon policies and carbon budgets should be reflected through a fundamental analysis within the WHPP process, with full use of carbon accounting at both the construction (embedded carbon) and operational (carbon emissions) phases.

We would like to see a carbon negative development, one that absorbs more carbon than it emits. This is possible with good planning and design, but significant opportunity will be lost if this is left to outline planning stage. The opportunities for creating carbon sinks with integration of 'green and blue' infrastructure should be maximised.

The approximately 4,000 homes being built in West Harrogate will make up roughly 5% of the overall homes in the Harrogate District. With good design these could make a major contribution to the area's net zero ambitions by being carbon negative urban expansion, rather than adding an additional carbon burden to the District.

2. Onsite Renewable Energy Generation

There is a major omission around energy for new homes. The sites present a major opportunity for solar (PV) electricity generation, but the opportunity needs to be maximised by south-facing roofs, and this impacts on the grain of development areas and street layouts. Small-scale wind turbines may also be possible on the higher parts of the development. Ground-source heat pumps, possibly for communal use, but certainly in the local centres and schools should be considered.



A district heating scheme and micro grid (to sell electricity between neighbours) would each make the new homes more resilient to rising energy costs. The opportunities to design out fossil fuels by elimination of gas supply should be considered. These features may cost a little more (though there will be offsetting savings) but are likely to give developers a commercial advantage in a world now getting used to higher energy prices for the foreseeable future.

3. Building Design

As stated above carbon accounting for all new development, but particularly of the new housing stock, should be central to WHPP. Whilst some aspects of design are covered in the great detail, WHPP contains not a single mention of building design for energy efficient homes, like insulation and airtightness standards in excess of Building Regulation requirements, passive heating and cooling for houses, and the use of modern ventilation systems. There is only one reference to BREEAM (again lifted from the Local Plan) and no consideration of how the achievement of the standard can be assisted in non-domestic elements of the development.

4. Moving away from car-based dependent transport

We would characterise WHPP as one that further enforces a car-based transport dependency. While much is made in the plan of bus and cycle and pedestrian routes, there is an underlying assumption that residents and workers will be reliant on private car ownership, rather than shared transport and active travel. The transition to net zero carbon living is often portrayed as a simple switch to electric vehicles. However, car ownership will need to half (because of the carbon embedded in car manufacture) and travel miles cut. This shift away from expensive private car ownership can be achieved most effectively with the provision of shared transport. Planning for homes and workplaces for the future should be reflecting this.

Given the location on the West of Harrogate away from the main public transport hubs in the town, we would like to see an imaginative “work from home” settlement, picking up on the 15-minute neighbourhoods seen in other UK towns with ample provision of car club vehicles.

Walking, cycling and bus routes should form the major distributors of movement, with car access being deliberately indirect. Bus priority facilities should enable easy access to and from employment and housing areas. The application of imaginative travel plans should underpin traffic reduction measures.

The lack of creative thinking about wider connectivity, beyond links to Harrogate Town Centre, perhaps best illustrate the car-centric thinking. For example, absence of a bus shuttle and cycle route to Pannal



rail station, a direct peak bus route to Leeds (Bilton and Starbeck has them), a Bradford and Skipton bus connection, and a walking/cycling route to Jennyfields and the Army Foundation College via Pot Bank.

Furthermore, the impact of Otley Road, currently a fast straight road through open country, has been ignored. Left in its current state, the road will become a major deterrent to north-south pedestrian movement, a disincentive to cycle use, and a major source of community severance. Imaginative treatment of this important corridor is required of this important highway is required to mitigate potentially adverse effects.

Other Comments on the Draft WHPP

- **Community Hubs**

The potential location for community services (the two proposed primary schools, local centres, sports pitches and allotments) featured in figures 6.3-6.7 appear to currently be scattered through the development. We strongly suggest that they are located adjacent to each other to create two community hubs around the two new schools to facilitate walking/cycling to school, and provide 'meeting up' places for local residents, further supporting the delivery of 15-minute neighbourhoods.

- **New Local Design**

Section 4 pages 63 – 78 give considerable details of traditional materials and design. However, no consideration is given to the need for a locally relevant detailed design to give the new settlements a distinctive character that is appropriate for a different era, one where carbon negative building materials are required, energy efficient design and climate resilient features are essential.

- **Blue/Green Infrastructure**

We are pleased to see the retention of as many of the established hedgerows and trees as possible, both for carbon capture and retaining wildlife habitats. We strongly suggest:

- Incorporating creating new habitats for wildlife in every aspect of design, even at a micro level, with bird and insect boxes constructed into the built environment and a tree planed into every garden.
- Creative use of drainage systems to create water features and wetland areas, together with appropriate planting



- **Public Transport Support Plan**

We would like to see a commitment public and active travel infrastructure being put in place ahead of the first occupation of new housing to prevent excessive car ownership. This must include establishing ample car club provision, bus routes operating from the date of the first occupation of new housing, cycle and pedestrian infrastructure build at the same time or before access roads.

- **Secondary School Provision**

A fully worked-up plan for good access to local secondary schools, including displacement effects on other areas of Harrogate and Leeds. Clear plans for the opportunities for growing active travel to/from school.

- **Offsite mitigation**

We strongly suggest that the WHPP is not approved until the Infrastructure Delivery Schedule is in place. So that the whole urban infrastructure can be considered as one dynamic community. Zero Carbon Harrogate would be happy to provide local community insight into matters such as the opportunities to create Low Traffic Neighbourhoods and other off-site traffic calming measures.

- **Modern Methods of Construction**

We strongly suggest that the site promoters are guided within this WHPP to appoint house builders committed to off-site prefabrication. Homes or components constructed off site in stable conditions are drier, quicker to erect and incorporate lower-carbon materials. Prefabrication minimises construction traffic, road closures, on-site noise and dust pollution for local residents and ecosystems. Factory built components can also help achieve significantly higher energy efficiency in a cost-effective way.

Whilst these comments stand alone, they should be read in conjunction with those submitted by the organisations that form part of the Western Arc group. We fully support the submission that has already been made by them.