

**PANNAL AND BURN BRIDGE NEIGHBOURHOOD PLAN**

**Regulation 16 Consultation (April/May 2023)**

**Pannal and Burn Bridge Parish Council: Response to issues raised during the Reg 16 consultation**

19 June 2023

ASPECT OF PLAN COMMENTED UPON	REPRESENTOR	REPRESENTATION MADE	RESPONSE
Vision	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	The Vision (paragraph 3) to improve connectivity through improved rail services, a modernised station and enhanced cycle and rights of way networks is supported. The Vision should however acknowledge that new sustainable development can help to achieve the delivery of this objective. The Vision (paragraph 4) makes no reference to the potential for new housing development to deliver housing appropriate to local needs beyond acknowledging the integration of the current housing allocations identified in the Harrogate Local Plan. There are, however, no proposed housing allocations in the Harrogate Local Plan located in Pannal. The only housing growth in Pannal (identified as part of the Plans Growth Strategy) relates to the housing commitment arising from an extant planning permission for the redevelopment of the former Dunlopillo site, now completed by Bellway Homes. The Vision as expressed is therefore misleading because, in the absence of any identified housing sites, the NP cannot deliver the	The content of the vision is a matter for the parish council as the Qualifying Body and the community it represents, not for consultants or developers – the community has consistently supported the plan’s vision. Re housing, the vision does not reference Local Plan housing allocations, but rather Harrogate’s overall housing allocation, to which the Bellway scheme has contributed, and to which future windfall/small scale developments will also contribute, and in so doing help to provide the desired mix.

		stated vision of providing a mix of housing appropriate to local needs, enabling the young to stay local and the old to downsize.	
	Gladman (PBBNP33)	In principle, Gladman supports the PBBNP’s vision which seeks to ensure a proudly separate, mixed community with a strengthened identity of its own. Furthermore, Gladman support the majority of the aims of the plan, notably in relation to the provision of the right types of homes to meet the needs of local people.	The PC welcomes the support.
Aims	NYC (PBBNP38)	<p>-This states that an aim of the plan is to not support further large-scale house building. This aim is considered to be contrary to the districtwide growth strategy set out in local plan (LP) policy GS2: Growth Strategy to 2035.</p> <p>-GS2 identifies that the need for new homes and jobs will be met as far as possible by focussing growth in the main settlements, settlements in key public transport corridors and a new settlement. As shown on the LP key diagram, Pannal is within the key public transport corridors and therefore, an area where growth could be focussed.</p> <p>-GS2 identifies that the scale of development will reflect a number of factors. The first of these is the settlement’s role in the settlement hierarchy. Pannal is identified as a service village. In service villages the strategy allows for land to be allocated for new homes to maintain or enhance services and facilities. LP paragraph 3.21 identifies that Pannal is one of nine service villages that offer a demonstrably wider range of services and facilities than other villages in the district.</p> <p>-Large-scale housing is a poorly defined term. Major development is defined within the planning system. For housing, development of 10 or more homes or a site area of 0.5ha. The opportunity for major development beyond the site allocated in the LP is limited by the development limit defined by LP policy GS3. However a review of the LP 4 that sought to retain the current strategy may</p>	The PC maintains its Regulation 14 position, i.e., that opposition to large scale house-building is in general conformity with the adopted Local Plan policy approach specific to Pannal, i.e. Local Plan policy – development limit, Green Belt, absence of unimplemented allocations - does not support it. The PC would also point out that this is an aim and not a policy. The NP’s policies – notably H1 and H2 – are about managing development in line with the aim. Further, the NP cannot be written and will not be examined against the possible outcome of any future LP strategy/policy review. It is the PC’s understanding that a NP aim would in no way prevent a housing allocation within a reviewed Local Plan – the updated Local Plan – the updated Local Plan would clearly override anything in the adopted NP.

		be required to seek to allocate land or loosen development limits to accommodate major development. The current aim may incorrectly be interpreted as preventing such allocation.	The PC would be happy to accept the point re 'large-scale housing' being a poor term and its substitution within the aim with 'major housing development'.
	North Yorkshire Police (PBBNP20)	A strong legislative and policy framework exists for considering Community Safety as part of the planning process. The Revised National Planning Policy Framework (England) July 2021 Paragraphs 92 and 130 state that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. Although both the draft Pannal and Burn Bridge Neighbourhood Plan and Basic Conditions Statement make reference to Paragraphs 92 and 130 of the National Planning Policy Framework), this does not preclude the Neighbourhood Plan from containing a policy in relation to Designing Out Crime and therefore consideration could be given to including such a policy within the Plan. An example of suitable wording would be: "Proposals will be expected to demonstrate how the design has been influenced by the need to plan positively to reduce crime and the fear of crime and how this will be achieved. "	NP policies are a reflection of the issues, concerns and problems raised by the local community during the plan preparation process. Crime/fear of crime/safety have not been raised and as such no policy has been developed and is not considered to be necessary for the plan area.
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	The stated aims of the Neighbourhood Plan "To ensure that homes of the right types are built to meet the needs of local people;" and "To not support further large-scale housebuilding and to control the building of any further new small-scale housing in the area;" are objected to. These Aims seek to place a moratorium on any new house building other than "...small gap sites, 'backland' or corner plots." By restricting potential housing development in this way, the Vision	The PC maintains its Regulation 14 position, i.e., that opposition to large scale house-building is in general conformity with the adopted Local Plan policy approach specific to Pannal, i.e. Local Plan policy – development limit, Green Belt, absence of unimplemented

		<p>of providing a mix of housing appropriate to local needs cannot be delivered. This is because only largescale development (by NPPF definition more than ten dwellings) can deliver affordable housing and other community benefits arising from planning obligation thresholds.</p> <p>The stated Aim to resist any meaningful housing development is completely at odds with the stated Vision and at odds with the NPPF emphasis of encouraging sustainable development, making this aspect of the Neighbourhood Plan unsound.</p>	<p>allocations - does not support it. The PC would also point out that these are aims and not policies. The NP's policies – notably H1 and H2 – are about managing development in line with the aim. Policy H3 – Housing Mix – would influence delivery of housing appropriate to local need were major development in line with Local Plan/NP policies ever to be permitted.</p>
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	<p>Paragraph 5.5.2 reproduces the aim of preventing developments more than ten dwellings/1000 sq. m. For the reasons stated above, this aim is objected to as it undermines the stated Visions of the Plan and conflicts with the NPPF objective of actively encouraging sustainable development.</p>	<p>Ref response immediately above.</p>
	Gladman (PBBNP3)	<p>In principle, Gladman supports the PBBNP's vision which seeks to ensure a proudly separate, mixed community with a strengthened identity of its own. Furthermore, Gladman support the majority of the aims of the plan, notably in relation to the provision of the right types of homes to meet the needs of local people.</p>	<p>The PC welcomes this support.</p>
	Gladman (PBBNP33)	<p>-However, two aims listed within the draft plan are 'To not support further large-scale house-building' and 'to control the building of any further new small-scale housing in the area'.</p> <p>-Ultimately, any proposed development must align with the strategic development plan of the plan-making authority and national planning policy guidance. Where proposals do not accord with such policies or guidance, including the need to boost the supply of housing and promote sustainable development</p>	<p>The PC maintains it Regulation 14 position, i.e., that opposition to large scale house-building is in general conformity with the adopted Local Plan policy approach specific to Pannal, i.e. Local Plan policy – development limit, Green Belt, absence of unimplemented</p>

		<p>opportunities, it is the local authority's prerogative to determine the application appropriately.</p> <p>-In this regard, Gladman suggest these two aims do not meet the basic conditions and should be removed from the PBBNP.</p>	<p>allocations - does not support it.</p> <p>The PC would also point out that these are aims and not policies. The NP's policies – notably H1 and H2 – are about managing development in line with the aim. The Basic Conditions Statement indicates how the plan takes full account of NPPF in this regard and contributes to the delivery of sustainable development.</p>
Policy GNE1: Green & Blue Infrastructure	NYC (PBBNP38)	<p>If the same policy has to apply to the whole area then why have 3 areas been identified. Do the 3 areas have the same justification or different?</p>	<p>Each area has its own characteristics which are clearly set out in Appendix 1. The differentiation between areas reflects the previous mapping work on which 2 of the areas are based and the additional identification of the Walton Fringe area.</p> <p>Experience from other NPs indicates that this approach, based on the 2010 work, has found favour with examiners/other LPAs alike, with the resultant areas/ boundaries approved in made NPs, e.g., Haworth.</p>
	NYC (PBBNP38)	<p>NYC cannot see how the policy will be applied and there is no detail about how the policy will operate and what criteria will be used to assess whether 'development will 'sever it or harms its operation .....'. It is particularly unclear how it will be applied in the parts of the corridors that seem to cover developed settlements.</p>	<p>The PC maintains its Regulation 14 position, i.e., that further detail/criteria are not necessary. This self-same policy approach has already been viewed favourably by</p>

			various examiners of other NPs in Yorkshire without any comment, e.g., Aberford, Otley, Haworth – ditto by the LPAs concerned. It should be noted that it is not uncommon for the Green & Blue Infrastructure designation to cover developed areas, e.g. Strategic Green Infrastructure as identified in the Leeds Core Strategy.
	NYC (PBBNP38)	The appendix has extracts (corridor descriptions) from some work undertaken by Natural England in 2010 but which hasn't really been progressed since then. The boundaries were drawn around a table from a workshop of interested parties working at a regional scale. This is partially recognised on p.12 and therefore the neighbourhood plan should not give the detail of the boundaries too much weight, and it may be better to draw own boundaries within the context of the regionally important corridors, based on detailed local knowledge and aspirations, as have been done with 'the Walton Fringe'.	The PC maintains its Regulation 14 position, i.e., that the NP uses the 2010 work boundaries as a necessarily broad starting point and interprets them at a local level relative to local geography – in effect drawing own boundaries as suggested. Experience from other NPs indicates that this approach, based on the 2010 work, has found favour with examiners/other LPAs alike, with the resultant areas/boundaries approved in made NPs, e.g. Haworth.
	Individual (PBBNP26)	Strongly support.	The PC welcomes the support.
Policy GNE2: Crimple Valley Special Landscape Area	Individual (PBBNP26)	Strongly support.	The PC welcomes the support.

	Gladman (PBBNP33)	<p>(1) -This policy aims to protect the Crimple Valley Special Landscape Area and ensure development proposals would not harm the character and appearance of the landscape.</p> <p>-The policy also refers to key views and vistas listed in appendix 3, many of which are already located within the Special Landscape Area. Therefore, the views and vistas are not justified to be under additional protection.</p> <p>(2) -Furthermore, Gladman consider that this policy is an unnecessary duplication of Policy NE4 of the adopted Harrogate District Local Plan and therefore contradicts paragraph 16(f) of the NPPF.</p> <p>-As a result, Gladman suggest this policy be removed to ensure the PBBNP is line with national planning policy.</p>	<p>(1) This is not additional protection as asserted, but rather an amplification of existing protection. This self-same policy approach has already been viewed favourably by examiners of other NPs in Yorkshire without any comment, e.g., Otley – ditto by the LPAs concerned.</p> <p>(2) The policy adds to rather than duplicates NE4 so does not contradict NPPF. This self-same policy approach has already been viewed favourably by various examiners of other NPs in Yorkshire without any comment, e.g., Aberford, Otley, Horsforth – ditto by the LPA concerned.</p>
Policy GNE3: Local Green Space Protection	NYC (PBBNP38)	<p>-As landowner, HBC do not support the allocation of Almsford Wood as Local Green Space under Policy GNE3 as we do not consider it to have demonstrable value to the local community of Pannal and Burnbridge. The site is not in close proximity or in easy walking distance to the community of Pannal and Burn Bridge due to the site being detached and not related to the village and on the other side of the A61 which needs to be crossed to access this site. The assessment for this site refers to a link path west going under the A61 road bridge linking the path to the pavement on the other side of the A61 however this needs to be clarified as this information conflicts with Policy GHE6 which refers to the need for an underpass. There is not to our knowledge a way of safely accessing this site underneath the A61.</p> <p>-As the site contains significant woodland, it is covered adequately by Local Plan policy NE7: Trees and Woodland and is sufficiently</p>	The LGS assessment supporting the proposed designation of this site (ref Appendix 2) makes it clear that the site particularly serves the closely situated Harrogate communities of Fulwith/Daleside and Stone Rings, that Pannal/ Walton Park are 1km distant and that the site also serves a wider community of visitors/walkers given its location on a well-used part of the PROW network. There is nothing in the LGS criteria to say that LGS within a Neighbourhood Area cannot have community value

		protected by other Local Plan policies such as HP5: Public rights of Way and NE3: Protecting the Natural Environment.	to proximate communities outside the area. It is maintained that the site does meet LGS criteria and that GNE3 adds to and strengthens Local Plan policies covering the site. The underpass reference/ inconsistency was removed prior to submission and does not appear in the assessment as asserted.
	Individual (PBBNP26)	Strongly support.	The PC welcomes the support.
Policy GNE4: Green Space Enhancement	NYC (PBBNP38)	Does this need to be a separate policy, could it not form part of Policy GNE3?	The PC maintains its Regulation 14 position, i.e., that experience indicates that either combined (e.g. Haworth NP) or separate (e.g. Otley, Aberford NPs) policies are equally acceptable to examiners. As LGS NPPF provision and guidance focus on designation/protection and do not reference enhancement, the inclination on balance is for separate policies.
Policy GNE5: Provision of New Open Space	NYC (PBBNP38)	The provision of new open space in connection with new housing development is carried out in line with Policy HP7 and the accompanying SPD which outlines the approach to calculating the need to provide new open space of 7 typologies, including allotments and outdoor sports, based on evidenced quantity standards. This process and standards meet the CIL Regulations. Requirements for Outdoor Sport provision are also governed by the Playing Pitch Strategy and the accompanying Sport England calculator. Policy GNE5 cannot be used to require developer	Such a policy approach has already been viewed favourably by various examiners of other NPs in Yorkshire without any comment, e.g. Otley, Haworth – ditto by the LPAs concerned. While accepting the point re developer contributions, such contributions are not the only route via which new open spaces



		contributions as it is simple aspirational policy. It is unclear therefore how this policy can be used to achieve the delivery of the open spaces referred to in the policy.	may be provided, e.g., provision by a community organisation or the PC itself.
	Individual (PBBNP26)	Definition of Tennis courts should embrace Padel tennis, currently one of the fastest growing sports in the country, popular amongst all age groups from children to the elderly.	The PC maintains its Regulation 14 position, i.e., that this is very much a minority view and may well be more expensive to install due to need for enclosed courts, although dual tennis/padel tennis courts are a feasible option.
	North Yorkshire Police (PBBNP20)	Whilst there would be no objections to the creation of these types of facilities in terms of Designing Out Crime, it would be pertinent to include something within the Policy to advise developers that the positioning and layout of any such feature should ensure that the principles of Crime Prevention Through Environmental Design (CPTED) have been incorporated to ensure that they do not have a negative impact on crime and disorder in the area.	The PC considers that such a reference would be far too detailed within the context of a simple aspirational policy.
Policy GNE6: Land at Almsford Bridge – Policy Preamble	NYC (PBBNP38)	It is recognised that para 5.1.19 has been amended following comments at draft plan stage however it is considered that this does not go far enough and still makes reference to the Harrogate Local Plan Inquiry and Inspectors concerns about the PN18 employment site. This is not appropriate to add here and should be deleted as there is no evidence of the discussion and there is no recommendation from the Inspector about the use of this land. The separation between Harrogate and Pannal will be maintained by the area of countryside between the two settlements and Policy GS3.	The PC disagrees and would cite the following evidence (key points highlighted). Para 161 of the inspector’s report states that “ <b>It is likely that development on site PN18 would give rise to adverse landscape impacts</b> and would compromise the setting of the Crimple Valley Viaduct. <b>MM143, which reduces the extent of the site</b> (reflected in modifications to the Policies Map and to the site

			<p>specific requirements), <b>is necessary to assist in mitigating such</b>, albeit less than substantial, <b>impacts. It would also serve to maintain a degree of separation between Pannal and the edge of Harrogate.</b> The PC would also draw attention to para 149 in respect of deleted site PN19:- “Site PN19 is extensive. It is, in my view, markedly at odds with the size of Pannal and would be likely to result in a disproportionate addition to the village. <b>It would advance the edge of Pannal to such an extent that, to all intents and purposes, the village would coalesce with Harrogate.</b> I conclude that the site should be removed from the plan (MM66). The PC notes that the projected northern edge of PN18, prior to site reduction was even closer to the edge of Harrogate than that of the removed PN19. The northern edge of PN18 in the adopted Local Plan is a similar distance from Harrogate’s edge to PN19. The PC maintains its view that the Policy GNE6 does address the inspector’s stated concerns as evidenced above.</p>
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	NYC (PBBNP38)	It is unclear as to the intention of this policy as it does not formally allocate this land for open space but merely refers to presenting “an opportunity for new open space”. This is very confusing, especially as the policy map shows the boundary of this land which infers some form of formal designation. The land is in NYC ownership and as landowners we do not support the inclusion of this land in Policy GNE6 or the use of the land as referenced in the policy. We therefore object to policy GNE6 as we do not consider it to be deliverable, achievable or sufficiently evidenced or justified. The land is currently open land and already benefits from an existing public Right of Way so we do not support the need for the additional ‘opportunities’ identified. The Local Green Space justification provided in the Neighbourhood Plan for part of this site identifies that it already has recreational benefits and states that the footpath already forms an attractive route linking interesting nature sites within the Special Landscape Area.	The PC maintains its Regulation 14 position, i.e., that experience indicates this self-same policy approach has been found to be acceptable by examiners in other ‘made’ NPs, e.g. Haworth Policy GE4. This includes the listing of criteria. The policy looks to extend the open space resource of Almsford Wood, south into the fields abutting the South of Almsford Bridge employment site, to create an improved natural area of recreational benefit.
Policy GNE7: Development & Trees	NYC (PBBNP38)	(1) How would the financial contributions be collected and replacement tree planting managed? (2) Existing or future commuted sums could be used for tree planting on land within Pannal, owned by NYC or PBPC and this could be referenced within the supporting text.	(1) The PC maintains its Regulation 14 position, i.e., that this is for the LPA to decide. How does NYC collect other financial contributions made in lieu of actual provision and provide for the management of other open space/landscaping provided as part of development? Experience indicates that this self-same policy approach has been found to be acceptable by examiners in other ‘made’ NPs, e.g. Otley Policy GE8. This policy is in turn based on adopted Leeds City Council Natural Resources and Waste Local Plan Policy LAND2.

			(2) The PC would be happy for the suggested reference to be added to supporting text.
	Gladman (PBBNP33)	<p>-Gladman acknowledges and generally supports the intentions of the policy to limit the loss of trees as a result of new development. However, Gladman consider it inappropriate for the policy to require or require a financial contribution in subsidy where replacement planting cannot be provided on site</p> <p>-This requirement does not align with the Local Plan policy NE7 which states no specific numerical amount of trees that must be planted for the loss of a tree as a result of development proposals.</p> <p>-Additionally, stating a required number of trees that must be planted for every one removed has no basis in national planning policy, with neither paragraph 174 nor 179 stating a figure should be applied. In addition, it is also not within the remit of the Steering Group to determine applications or decide the required financial contributions.</p> <p>-In this regard, it is proposed that the policy requires further flexibility to meet the basic conditions and Gladman propose the following:  “...Where the lack of suitable opportunity for this exists, an agreed financial contribution will be required the Steering group would support a financial contribution for tree planting at a later date, also elsewhere within the Neighbourhood Area.”</p>	<p>The PC considers that GNE7 does not conflict with NE7, rather it adds to it. It is notable that NYC have not objected to this policy. As stated at Regulation 14 stage, experience indicates that this self-same policy approach has been found to be acceptable by examiners in other ‘made’ NPs, e.g. Otley Policy GE8, i.e., meeting basic conditions/taking account of NPPF. This policy is in turn based on adopted Leeds City Council Natural Resources and Waste Local Plan Policy LAND2.</p> <p>The respondent’s references to the role of the steering group are clearly inappropriate as it has no role in planning application determination or policy implementation and nowhere does the NP state that this is or should be the case.</p>
Green & Natural Environment – Community Actions	NYC (PBBNP38)	<b>Local Geological Site</b> – There is an aspiration to make the rock exposure at Sandy Bank Quarry into a LGS (& P49). This could be done through the Local Plan Review – I believe that the North Yorks. Geological Partnership has documented and set out the	The PC welcomes this support.

		case for about half a dozen proposed RIGs in Harrogate District, including Sandy Bank Quarry. NYC would support designation as an LGS, subject to the agreement of the SINC panel.	
	NYC (PBBNP38)	<b>'Country Park' status</b> - SLA NE of parish church (p.49) – this is not a designation, but Natural England say “Country parks are areas for people to visit and enjoy recreation in a countryside environment”. NE produce guidance for what they call accredited county parks, with a minimum size (10ha) public access with a minimum level of facilities. Not sure this is appropriate in this instance. HBC Parks have a couple of sites which they call ‘country parks’, but these are not accredited by NE the label has no particular status in planning. This concern still remains.	This is a non-planning community action rather than a policy. The PC is keen to explore its country park aspiration further.
	Individual (PBBNP18)	I would also like to comment on section 5.1.26 (p.18 and p.67) regarding Sandy Bank Wood. I very strongly support the proposed protective designations for Sandy Bank Wood, which is a little wildlife haven, a small sanctuary for chiffchaffs, great tits, blue tits, great spotted woodpeckers, and many other birds, as well as a beautiful and tranquil place for humans.	The PC welcomes the support.
	North Yorkshire Police (PBBNP20)	Trees have the potential to become climbing aids once mature that can assist an offender to gain entry into the rear garden of a property. Research has shown that offenders prefer to gain entry to a property from the rear, particularly if there is a lack of natural surveillance. Therefore, any tree planting that is undertaken should ensure that they are not positioned too close to the rear boundary of a property to prevent this from occurring. In view of this consideration could be given to including something within this section to identify the need to ensure that care will need to be taken when planting trees to ensure that climbing aids will not be created once they are mature.	The PC would be agreeable to including something along these lines, e.g. the specifying of only low shrub planting against property boundaries, in the community actions which reference new planting.

	Individual (PBBNP39)	5.1.26 Supportive of this proposal for the benefit of future generations and attractiveness of the neighbourhood to young families.	The PC welcomes the support.
The Green & Natural Environment - General	CPRE North & East Yorkshire (PBBNP36)	CPRENEY welcomes the level of thought and consideration given to the Special Landscape Area Crimple Valley, the importance of Blue and Green Infrastructure, particularly, the Crimple Corridor, Haverah Corridor , and The Walton Fringe to protect their operation as part of a multifunctional wildlife, amenity and recreational network for its own sake, and the promotion of Local Green Spaces throughout the large Neighbourhood Area. CPRENEY also welcomes the recognition given to the need to protect existing trees within the Plan but also the important need for new tree planting in response to combatting climate change, increasing biodiversity, creating high quality healthy living environments and enhancing the public realm.	The PC welcomes the supportive comments.
Policy BE2: Local Heritage Areas	NYC (PBBNP38)	It is noted that the Heritage Areas Policies BE2 and BE3 are presented separately to the section on non-designated heritage assets. At the same time, para 5.2.12 indicates that the Parish Council consider the Local Heritage Areas to be worthy of protection 'similar' to that for Conservation Areas. Conservation Areas are not designated through local planning policies and therefore NYC consider these Local Heritage Areas as proposals for non-designated heritage assets. The Neighbourhood Plan therefore needs to recognised this within the supporting text and ensure that the policy is consistent with NPPF.	The PC would be happy for the supporting text to acknowledge LHAs as non-designated heritage assets. The PC notes also that it is aware that in the 'made' Horsforth NP (Leeds), the non-designated heritage area policy (BE6) specifically lists Local Heritage Areas as an asset. The PC would also be amenable to this policy approach.
	CPRE North & East Yorkshire (PBBNP36)	CPRENEY also supports the inclusion within the Neighbourhood Plan and policies map of Local Heritage Areas setting out those areas which have been assessed to be worthy of similar protection as designated Conservation Areas. The evidence gathered for this	The PC welcomes this support.

		will also be useful in extending the existing Conservation Area should the Council be so minded to do so.	
Policy BE3: Local Heritage Areas – Development & Design	NYC (PBBNP38)	<p>(1) Not sure this needs to be a separate policy, could it not form part of Policy BE2.</p> <p>(2) This policy is quite confusing with the general requirements and then the specific requirements for each area. It will be very difficult and restrictive to expect development in all the areas to have to comply with all the general requirements when the areas are different with their own characters. Will also be very difficult for Development Management officers to interpret as part of planning application consideration. There are also a number of the requirements that are ambiguous and not specific enough such as ‘Retain surviving historic buildings’. These would need identifying individually as the statement is open to lots of different interpretation.</p> <p>(3) Recommendation – delete the general requirements but create specific, individual requirements for each Heritage Area and list those features within each area that you want to protect and retain. These could then be added to the list of non-designated heritage assets.</p> <p>(4) Area 4 – Pannal Methodist Church for example seems to overlap with a Village Character Area – how would the design requirements for the 2 areas be assessed at application stage.</p>	<p>(1) The PC maintains its Regulation 14 position, i.e., that experience indicates that this self-same 2 policy approach has been found to be acceptable by examiners in other ‘made’ NPs, e.g. Otley, Haworth, Horsforth. The PC sees no reason to vary from this approach.</p> <p>(2) The PC maintains its Regulation 14 position, i.e., that experience indicates that this self-same general/specific policy approach has been found to be acceptable by examiners in other ‘made’ NPs, e.g. Haworth, where the same requirements apply to a number of different LHAs. The PC sees no reason to vary from this approach. As stated above, the general requirements apply across LHAs. As the policies are couched in terms of what development ‘should’ do, rather than ‘will’ or ‘must’ do, there is considered to be flexibility as to what is expected. Regarding management officer interpretation, including re ‘surviving historic buildings’, this wording has proved acceptable to examiners in other</p>

			<p>'made' NPs, e.g. Haworth, Horsforth.</p> <p>(3) The PC is not agreeable to this recommendation – this would result in needless duplication within policies for each LHA. Also, it would run counter to the PC/NP's approach re NDHA in private ownership as set out on P26 para 5.2.17 and in Appendix 5.</p> <p>(4) The area/policy overlap is not considered to be a problem. It is common in Local Plans and NPs for areas/sites to be covered by different policies and for management officers to have to apply those policies, e.g. various designations/policies overlaying sites in Pannal in the Harrogate District Local Plan.</p>
	North Yorkshire Police (PBBNP20)	<p>(1) Whilst it is accepted that permeability can be advantageous, connections that do not provide direct access to local amenities can create excessive and unnecessary permeability. Each additional access point into a development provides an offender with another potential access/escape route. Therefore, consideration could be given to the inclusion of wording similar to the below:-</p> <p>“Seek to maintain and where appropriate enhance pedestrian permeability through areas, provided this is not excessive or unnecessary”</p>	<p>(1) The PC would be happy to see the policy provision amended in this way.</p> <p>(2) The PC considers the introduction of such wording to be inappropriate within this policy. However, it would be agreeable to the inclusion of wording in line with the recommendation in Policy TTT1: Improved Walking, Horse Riding and Cycling Provision, instead.</p>



		(2) Best practice recommends that all public footpaths should be well overlooked to provide users with a sense of safety and security. It also helps to encourage its bona-fide use, whilst deterring criminal or anti-social activity. Therefore, consideration could be given to introducing wording similar to the below:- “The developer should ensure that any new public footpath is provided with appropriate levels of natural surveillance and that where possible that dwellings on new developments are orientated to overlook existing footpaths or other public rights of way”	
Policy BE5: Village Character Areas – Development & Design – Policy Preamble	NYC (PBBNP38)	Para 5.2.20 identifies that the policy is underpinned by a Design Code report however this has not been submitted with the plan for consideration and therefore it is unclear whether the requirements of BE5 are justified by appropriate evidence.	The Design Code report is available on the NP pages of the PC website and has been since Regulation 14 stage.
Policy BE5: Village Character Areas – Development & Design	NYC (PBBNP38)	Tree planting close to the railway line will need to be checked with Network Rail as it can cause safety and maintenance issues. Unsure as to whether Network Rail have been consulted or not in the preparation of the policy.	Network Rail were consulted at Regulation 14 stage and again, at HBC’s suggestion, post-Regulation 14. They chose not to respond on either occasion.
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	The Leeds Road Character Area does not appear to refer to the character of the area around Thirkill Drive arising from the implementation of the mixed-use regeneration of the former Dunlopillo site and the residual land to the south that falls within the NP area. This area has its own characteristics arising from that mixed use redevelopment including the Vida Care Home, the development of light industrial units and the development of housing (by Bellway) with associated play area and pitches to the south. The residual land to the south of the redevelopment site within the NP area has the potential to deliver development along	The policy provisions only relate to character areas, in so far as there is considered to be distinctive character that should be taken account of in any new development. It is considered that while the Thirkill Drive/Dunlopillo area has characteristics, it does not have any notable character that should be taken account of in any

		with associated community benefits and should be recognised as a distinct character area. These could include, for example, the delivery of a new footpath from the Thirkill Drive recreation ground, west to the existing Malthouse Lane/A61 PROW (5) as envisaged in draft Policy TTT1.	new development. The residual land to the south is covered by the Green & Blue Infrastructure policy.
Policy TTT1: Improved Walking, Horse Riding & Cycling Provision	NYC (PBBNP38)	<p>(1) Para 2 – How are you planning to assess whether it increases pedestrian footfall etc? Any necessary development mitigation including rights of way improvements and enhancements will be identified in consultation with the Highways Authority.</p> <p>(2) Any contribution to the improvement of the public rights of way network would have to be done through off-site S106 contributions and to meet the CIL Regulations would have to be necessary and related to the specific development. There would therefore need to be a specific assessment of this link to enable contributions to be made.</p>	<p>(1) The PC maintains its Regulation 14 position, i.e., that this aspect of the policy approach has not been perceived as an issue/problem by examiners of other NPs (or the LPAs concerned) in which the self-same approach has been viewed favourably and now appears in a number of made NPs, e.g. Haworth, Horsforth, Otley.</p> <p>(2) It is unclear from the comment whether the ‘specific assessment’ would need to be done as part of the NP or at the time of any development proposal – the latter is assumed as proposed details would not be available until that stage. As immediately above, this policy approach, i.e. specifying improvements that would be supported, has not been perceived as an issue/problem by examiners of other NPs (or the LPAs concerned) in which the self-same approach has been viewed favourably and now appears in made NPs, e.g. Haworth, Otley.</p>

	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	The policy requirement for a new footpath from the Thirkill Drive recreation ground is supported but the policy should recognise the potential for this to be delivered by a development that encompasses the balance of the land south of the Dunlopillo site to the NP boundary (see site specific proposal below).	Policy TTT1 supports the new footpath rather than it being a policy requirement. The balance of the land to the south is Green Belt. The NP has no powers to vary Green Belt boundaries or sanction/support Green Belt development. To do so would bring it into conflict with the adopted Local Plan. The PC and community are supportive of the Green Belt around Pannal.
	Individual (PBBNP39)	Supportive of enhancements to footpath, bridleway and footbridge between Pannal Main Street, Almsford Bridge and Pannal Community Park. These will provide much needed, safe and village-like links to key amenities (on the outskirts of Harrogate, the community park itself and the food hall/restaurant on the Crimple Hall site as referred to at 5.4.7). The footbridge over the River Crimple being of particular importance if the parish council is no longer in support of further restaurant within the Neighbourhood Area.	The PC welcomes this support.
Car Parking	NYC (PBBNP38)	Has any thought been given to alternatives to car use rather than encouraging further cars into Pannal and greater dependence on private cars? Could any new developments include car club provision?	As a result of the self-same comment made at Regulation 14 stage, the Submission NP includes a new community action relating to research and local promotion re 'Demand Responsive Transport' options.

<p>Policy TTT3: Car Parking Standards for New Development in the Vicinity of Pannal Station and Pannal Primary School</p>	<p>NYC (PBBNP38)</p>	<p>(1) Appreciate the concerns regarding car parking but need to consider that providing more car parking will not discourage car use, in fact it could have the opposite effect.  (2) Higher car parking standards can encourage car use and ownership. Arguably developments in short walk of good transport infrastructure (rail line) and near local facilities (school) can have reduced or no car ownership rather than over provision. When setting local parking standard, the NPPF para 107 requires policies to take account of several factors including the availability of and opportunities for public transport. It is not clear that these factors have appropriately influenced the approach. It is unclear whether existing standards are understood and whether a higher level of provision can be met on development sites whilst meeting other policy requirements.  It would need to be demonstrated that the application of existing standards are contributing to the current difficulties in order for the proposed approach to meet the intended aims of reducing current parking problems.  In response to earlier comments the Parish Council have noted that NPPF para 108 supports higher standards however evidence to this effect has not been provided.  This policy is not supported by NYC and should be deleted.</p>	<p>(1) The PC maintains its Regulation 14 position, i.e., that the only additional car parking proposed in the NP is in Policy TTT3 (off-road parking in excess of adopted standards for new developments in areas with existing on-street parking problems, i.e. to alleviate a village problem) and in Policy TTT4 (weekend/evening use of Park and Stride facility by Pannal Community Park visitors).  (2) The PC is content to let the examiner rule on this policy, but maintains that the proposed policy approach is required to prevent an existing problem getting worse in the event of any development which includes only standard car parking provision.</p>
	<p>North Yorkshire Police (PBBNP20)</p>	<p>It is noted that the issue regarding the lack of parking for parents at the school is raised in the Foreword of the document. The document entitled “Guidance Note on Residential Parking” produced by the Institute of Highway Engineers comments that neighbour disputes relating to parking issues can sometimes escalate, resulting in violence or legal action. Building For a Healthy Life (BHL), which is the industry standard, endorsed by government, for well-designed homes and neighbourhoods, states that developers should anticipate realistic levels of car parking demand, to guard against displaced and anti-social parking</p>	<p>The PC would ask the examiner to take this into consideration in examining the policy and comments on it.</p>

		In order to support this Policy consideration could be given to making reference to the guidance in BHL.	
Policy TTT4: Pannal Park and Stride	NYC (PBBNP38)	Para 5.3.8 states that the plan puts in place a policy for new Park and Stride provision however Policy TTT4 is confusing as it does not allocate.	The PC maintains its Regulation 14 position, i.e., that this type of 'support' policy is common in made NPs and has found favour with both examiners and other LPAs, e.g. Haworth, Otley, Horsforth and Aberford NPs. The PC would be happy to agree to the amendment of para 5.3.8 to read "puts in place a policy supportive of new Park and Stride provision".
	Individual (PBBNP39)	Supportive of the Park and Stride provided it is sufficient to entice vehicle users from the North and West of the Neighbourhood Area to it rather than parking on Main Street and Rosedale as is currently the case. The prospect of a school bus would seem to be a better solution to Neighbourhood Area traffic congestion at school drop-off/pick-up time but the economics need to be assessed.	The PC welcomes the support. The plan includes a community action, added post-Regulation stage, re exploring the feasibility/ possibility of a school bus.
Highway Improvements	NYC (PBBNP38)	Re para 2 - HBC should be consulted on the appendix when available. In draft plan the appendix is discussed as being photographic and other evidence to support the proposal of schemes in policy TTT6. There is no reference to the appendix in corresponding para in submission plan. Submission plan does have adtnl appendix though- App 6, however this appears to be photographs of parking close to school and station in support of policies TTT2 and TTT3. No ref to appendix in corresponding para in submission plan.	The PC took the decision not to include the originally proposed appendix in support of TTT6, hence the removal of the reference to it in the submission plan. Appendix 6 is in support of Policy TTT3. Appendix 6 is referenced in para 5.3.9.

Policy TTT6: Highway Improvement Schemes	NYC (PBBNP38)	<p>(1) It should not be stated that developments will be supported if they bring about specific improvements as this would not meet the CIL regulations. Highway improvements can come about as a result of development and the specific mitigation measures but this should be part of the balanced planning judgement and consideration of the impacts of the actual development not a reason for supporting them.</p> <p>(2) It is unclear from the policy how proposals that don't include the improvements will be treated by decision makers. Without the support of the Highway Authority we do not think that it should lead to refusal.</p>	<p>(1) The PC accepts, and the policy specifically acknowledges, that to be supported schemes must be either NP or Local Plan policy compliant, including regard to Local Plan TI4 (Delivery of New Infrastructure).</p> <p>(2) The policy does not state that proposals/developments which don't include improvements will not be supported.</p>
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	The policy requirement for new highway infrastructure is supported but the policy should recognise the potential for aspects of these improvements to be delivered by a development that encompasses the balance of the land south of the Dunlopillo site to the NP boundary (see site specific proposal below).	The PC welcomes the support, but notes that the policy does not include a policy requirement, rather it supports. The balance of the land to the south is Green Belt. The NP has no powers to vary Green Belt boundaries or sanction/support Green Belt development. To do so would bring it into conflict with the adopted Local Plan. The PC and community are supportive of the Green Belt around Pannal.
Traffic Transport & Travel – Community Actions	Individual (PBBNP39)	5.3.16 Lollipop person at zebra crossing on Pannal Main Street - whilst this would absolutely be welcome i feel the bigger question is the safety of that crossing in that location. Particularly when approached from the South West pavement, crossing there at any time of day is a step into the unknown and faith is required in any Northbound traffic stopping in time. As the prevalence of quiet vehicles (i.e. EVs) increases so too does the risk and danger of	The PC would be agreeable to a new community action addressing the move of the zebra crossing northwards, as suggested, i.e., away from the blind corner and has lobbied for same repeatedly. It is not known if the new NYC would be

		serious incident at this crossing. I believe a relocation of the zebra crossing Northwards is feasible and would address this particular issue.	agreeable to the idea. Both the former HBC and NYCC have previously said 'no' to this.
Traffic Transport & Travel - General	Individual (PBBNP18)	I would like to comment on section 5.3 (pp.30-31 and p.35) regarding improved walking, horse riding and cycling provision. I often walk or cycle through Pannal. Wider pavements on Church Lane are very much needed because of the speed of traffic on this road and because children need to be able to walk to the primary school safely, or from Pannal and Burn Bridge up to the local secondary schools. Better, safer, joined-up cycle routes are needed everywhere, and I strongly support those proposed in this plan.	The PC welcomes the support.
	CPRE North & East Yorkshire (PBBNP36)	The prominence given to vulnerable and non-vehicle users within the Neighbourhood Plan is welcomed.	The PC welcomes the supportive comment.
New Educational Facilities for Pannal Primary School	NYC (PBBNP38)	Para 5.4.9: The text incorrectly identifies PN20 as a policy in the local plan (LP). LP policy T16: Provision of Educational Facilities allocates a number of sites for educational use. These include a site at Pannal Primary School called PN20: Educational Facilities at Pannal Primary School. Policy T16 explains that the site is allocated to allow for the expansion of the existing primary school. It is requested that the paragraph is amended to ensure accuracy.	The PC is agreeable to such an amendment.
Policy H1: Small Scale & Infill Housing Development within the Development Limit	NYC (PBBNP38)	The amendments to this policy following earlier comments are noted. Following comments on the plan aims, bullet 7: The policy title infers that it relates only to development within the development limit where this is small scale or in-fill whereas the policy wording captures any housing within the development limit. This confusion is also within the text preceding the policy at para 5.5.4. Local plan (LP) policy GS3: Development Limits sets the strategic context for proposals within development limits. It	The PC would welcome suggestions re policy wording to address this perceived issue. Perhaps this could be achieved by adding "and be compliant with policies in the Harrogate District Local Plan" or "Harrogate District Local Plan Policy GS3". Alternatively, the title could

		provides in-principle support for proposals that are in-line with other relevant LP policies. It is considered that the proposed policy may appear to limit the in-principle support provided by GS3 to small-scale and in-fill proposals. Such an approach would be contrary to the LP growth strategy.	be amended to simply read 'Housing Development within the Development Limit', as in practice there is very limited scope for anything other than small scale/in-fill housing development within the development limit, other than through redevelopment of existing built areas.
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	Policies H1 and H2 are also objected to on the basis they seek to introduce a housing moratorium in Pannal and prevent any meaningful development including development that could be designed to ensure it meets all sustainability objectives.	Policy H1 allows for housing development within the development limit, in line with Local Plan policy, specifically GS3 – this by definition is not a moratorium.
Policy H2: Development Outside the Development Limit	NYC (PBBNP38)	Local plan (LP) policy GS3: Development Limits sets the strategic context for considerations of proposals in the absence of a 5 year supply of housing land in the plan area. This policy introduces additional considerations that go beyond providing detail to the requirements of GS3. The additional requirements set out in para 2 introduces further tests that may prevent application of the presumption as set out in NPPF para11, in particular part d. It is also not clear how the 'intrinsic value' or 'valuable contribution' referenced in para 2 can be adequately assessed.	The PC maintains its Regulation 14 position, i.e., that this policy approach, with self-same wording (or similar), has not been perceived as an issue/problem by examiners of other NPs (or the LPAs concerned). Rather, it has been viewed favourably and now appears in a number of made NPs, e.g. Haworth, Otley within the context of similar Local Plan policies. The criteria reflect concerns of the local community, as voiced in consultations, and the PC. They are considered to add to



			GS3 while still being in conformity with it.
	NYC (PBBNP38)	-‘No development to exceed the capacity of infrastructure, as existing or provided as a condition of development’ – this sentence is quite confusing. If the development is judged to have an impact on the capacity of existing infrastructure, then these impacts will need to be mitigated either through onsite provision, off-site provision/improvements or financial contributions. This would then make the proposal acceptable in planning terms and could not be refused on infrastructure capacity grounds. -These concerns still remain. Requirements in para 3 do not recognise the ability of development to provide infrastructure improvements to adequately mitigate their impacts.	The PC maintains its Regulation 14 position, i.e., that this policy approach, with self-same wording (or similar), has not been perceived as an issue/problem by examiners of other NPs (or the LPAs concerned). Rather, it has been viewed favourably and now appears in a number of made NPs, e.g. Haworth, Otley within the context of similar Local Plan policies. The criteria reflect concerns of the local community, as voiced in consultations, and the PC. The PC would take particular issue with the last sentence of the comment as that is exactly what the first quoted paragraph of the policy, beginning “no development to exceed...” does.
	CPRE North & East Yorkshire (PBBNP36)	CPRENEY particularly welcomes and gives strong support for Policy H2 of the Neighbourhood Plan which seeks to provide a set of local ‘tests’ that would be applied alongside existing Local Plan policy ‘tests’, in order to determine the in principle acceptability of any proposal sites for new housing development outside the development limit. This addresses CPRENEY concerns in relation to developers seeking permission (often successfully) for development outside of Local Plan allocations on greenfield land regardless of housing land supply positions.	The PC welcomes the support.

	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	Policies H1 and H2 are also objected to on the basis they seek to introduce a housing moratorium in Pannal and prevent any meaningful development including development that could be designed to ensure it meets all sustainability objectives.	Policy H2 allows for housing development outside the development limit, in line with Local Plan policy, specifically GS3 – this by definition is not a moratorium.
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	<p>-The first prerequisite of this policy is that proposals for new housing development can only be considered “In the absence of a five-year supply of housing land...” The level of supply of housing land at any given time is not the first and defining test of whether development can be considered sustainable. As it is worded, it reinforces my view that the policies in the NP are seeking to introduce a moratorium on housing development and this first part of the policy should therefore be deleted.</p> <p>-The ‘ additional’ test at paragraph 2 is objected to because the test itself, whether green field land has intrinsic amenity value, is very subjective and can easily be interpreted to resist any proposals for development on green field land, irrespective of its sustainability merits.</p> <p>-The ‘ additional’ test at paragraph 3 is objected to because it seeks to prevent development that could exceed the capacity of existing infrastructure, irrespective of the potential for development to either mitigate its impact or in cases where it could improve infrastructure and help to meet the wider objectives of the Plan.</p> <p>-Similarly, the ‘ additional’ test at paragraph 4 is objected to because it seeks to prevent development which results in adverse effects on air quality, irrespective of the potential for the development to mitigate those impacts or improve air quality in other parts of the NP Area. For example, development could assist</p>	The PC maintains its Regulation 14 position, i.e., that this policy approach, with self-same wording (or similar), has not been perceived as an issue/problem by examiners of other NPs (or the LPAs concerned). Rather, it has been viewed favourably and now appears in a number of made NPs, e.g. Haworth, Otley within the context of similar Local Plan policies. The criteria reflect concerns of the local community, as voiced in consultations, and the PC. They are considered to add to GS3 while still being in conformity with it.

		to fund Electric Vehicle Charging points – a stated objective of the NP.	
	Gladman (PBBNP33)	<p>(1)-Outside of Policy H1 (small-scale residential developments within the developments limit), this policy is the only mechanism to bring forward additional residential development in Pannal and Burn Bridge that can meaningfully contribute towards reducing the lack of residential land available within the wider Harrogate authority area.</p> <p>(2)-Gladman consider that the policy is simply a duplication of national planning policy guidance, notably NPPF Paragraph 11d) and Footnote 8, alongside the need to promote sustainable patterns of development. While the ‘Local Tests’ are not such and are general elements which the determining authority will consider.</p> <p>-For instance, the Policy states that no development should exceed the capacity of infrastructure, listing the relevant facilities and in which regard they are measured, i.e. education – local primary school places.</p> <p>-This is not relevant for a neighbourhood plan policy and restricts the ability for residential development to come forward. Investigating the suitability and capacity of existing infrastructure and facilities, is for the statutory consultees that are consulted through the planning application process. These statutory consultees will determine the capacity of facilities and subsequent impact of developments, and, where appropriate, will request financial contributions to ensure the existing infrastructure is able to cope. These payments will then form part of a S106 agreement.</p> <p>-As a result, Gladman suggest this element of the policy be removed and be amended to reduce the level of restriction the policy imposes on potential residential development sites, in an area that housing land is needed.</p>	<p>(1) There is no requirement on NPs to include policies on any matter which the PC/local community does not wish to address. Similarly there is no requirement to propose additional residential development.</p> <p>(2) The PC maintains its Regulation 14 position, i.e., that this policy approach, with self-same wording (or similar), has not been perceived as an issue/problem by examiners of other NPs (or the LPAs concerned). Rather, it has been viewed favourably and now appears in a number of made NPs, e.g. Haworth, Otley within the context of similar Local Plan policies. The criteria reflect concerns of the local community, as voiced in consultations, and the PC. They are considered to add to GS3 while still being in conformity with it.</p>

Policy H3: Housing Mix	NYC (PBBNP38)	The requirements of the policy in terms of a mix of house sizes is supported as these are broadly in-line with the findings of the 2018 HEDNA. NPPF paras 61 and 62 require such policies to be supported by a housing needs assessment. It is not considered that a survey of what local people would like to see developed meets this requirement and therefore, the supporting text should make reference to the HEDNA and its findings.	The PC welcomes the support and would be happy for reference to the HEDNA to be included in supporting text.
	North Yorkshire Police (PBBNP20)	In order to create a cohesive community and to accord with Policy HS2 of Harrogate’s Local Plan (2014 – 2035), consideration should be given to introducing wording in this Policy similar to the below. “Proposals should ensure that affordable homes are indistinguishable from open market properties and should be spatially integrated within a development to create a cohesive community.”	It is not appropriate or necessary for NP policy to duplicate what is already set out in Local Plan Policy HS2.
Housing - General	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	The main omission from this Chapter is the identification of a site for development that can assist to deliver the stated vision and infrastructure improvements set out in various aspirational policies. The Chapter should take a proactive approach to the identification of a site that can deliver an appropriate level of sustainable growth alongside specified locally listed infrastructure enhancements. A site-specific proposal is identified further below.	There is no requirement on NPs to include policies on any matter which the PC/local community does not wish to address. Similarly there is no requirement to propose additional residential development.
	Addison Planning Consultants for Forward Vision (FI) LLP (PBBNP32)	POTENTIAL SITE FOR DEVELOPMENT: Land South of Pannal. By way of background, my clients have previously submitted a ‘Site Promotion’ document to Harrogate Council (now North Yorkshire Council) to be considered in the context of the planning for a future review of the Council’s Local Plan. Most of the land in the site promotion document falls outside of the Neighbourhood Plan area.	The site in question is Green Belt. The NP has no powers to vary Green Belt boundaries or sanction/support Green Belt development. To do so would bring it into conflict with the adopted Local Plan. The PC and community

		<p>The site has major strengths in terms of location adjacent to the major transport hubs of Pannal train station and the A61 and its connectivity to the main transport infrastructure for the district. As a strategic site, and with the ability to deliver multiple significant public benefits (new school and park and ride facility) along with some of the aspirational environmental improvements set out in the draft policies of the Neighbourhood Plan. In that regard, the larger part of the Phase 3 area (<i>NB north of Thirkill Drive/A61, upto rail line/parish boundary</i>) does fall within the Neighbourhood Plan area.</p> <p>The area within the NP boundary....could still deliver a meaningful level of development – either residential or commercial – that could assist to deliver the environmental improvements sought I the plan.</p> <p>The land between Thirkill Drive and the NP boundary is in a highly sustainable location in proximity to train, bus and good highway connections. A unique, sustainable design of residential development could deliver the stated aims of sustainable travel improvement, of providing a mix of housing development appropriate to local needs, enabling the young to stay local and the old to downsize; and a range of wider environmental improvements.</p> <p>Similarly, the land lends itself as a unique location for a new school or, if that is not required, for additional employment generating development.</p> <p>The NP should recognise the potential of this land as sustainable development land that, developed correctly, would lead to the overall enhancement of the sustainability of the village.</p>	<p>are supportive of the Green Belt around Pannal.</p>
	<p>Individual (PBBNP10)</p>	<p>Re: The proposed development of houses on Spring Lane from behind Pannal Methodist Church down the North side of Spring Lane towards Clark Beck. Approx 48 new homes:- Spring Lane and the roads that lead to it are already too narrow and over used. 48</p>	<p>This is not a development proposed within the NP. It is unclear to what this comment relates.</p>

		<p>homes generally means 96 new cars. Plus the increase in delivery vans to the new homes:</p> <ul style="list-style-type: none"> <li>-There is no bus service in the area.</li> <li>-There is no provision for increased - Schooling - GP services - Hospital - Policing. All of these services are already at breaking point.</li> <li>-Carbon Footprint - are there stipulations for heat source / solar panels / EPC rating A?</li> <li>-Unjustifiable effect on the wildlife.</li> <li>-If each property pays £1500 pa in rates - thats £72k pa to the authorities - the numbers surely dont add up in terms of helping to improve the overall provision of services from what has been a disaster over the last 10 years for homeowners in the region.</li> <li>-More shortsightedness, adding to an overall destruction of the character of Harrogate and the surrounding area.</li> </ul>	
	Individual (PBBNP19)	<p>Don't you think you've built enough houses in Harrogate and the surrounding area over the last 5 years? You've put no new infrastructure in place and Harrogate has become a town that's sinking under the weight of too many people and not enough facilities, ie schools, doctors, dentists, etc. You should be ashamed with how you've destroyed the soul of Harrogate. It used to be a place that people were proud of, now you've only got to walk through the town centre at any time of day or night to realise it's become the home of drug dealers and pound shops. Disgraceful</p>	<p>It is unclear to what this comment relates as no new housing is proposed within the NP and the NP does not cover any area other than the Pannal Neighbourhood Area.</p>
Policy ED2: Employment Site South of Almsford Bridge – Development Requirements	NYC (PBBNP38)	<p>(1) Use of the word “screening” and “restrictions” are too negative. Para 5.6.7: This concern remains. (2) Concern around bullet 2 remains as it is considered that this requirement could prevent the delivery of this strategic employment allocation that is important in the supply of employment land in the plan area.</p>	<p>(1) This is factual reporting of what people said during consultations and stated to be such – the fact that it is negative is irrelevant. It is not the role of NYC to censor historical fact.</p>

			(2) The PC disagrees. The wording gives ample flexibility to put buildings on the site in such a way that key viaduct views are retained as required by Local Plan policy. There is no Local Plan conflict. As a matter of fact, the wording was okayed with HBC officers in a meeting pre-Regulation 14.
Appendix 1: Green & Blue Infrastructure	NYC (PBBNP38)	The appendix has extracts (corridor descriptions) from some work undertaken by Natural England in 2010 but which hasn't really been progressed since then. The boundaries were drawn around a table from a workshop of interested parties working at a regional scale. This is partially recognised on p.12 and therefore the neighbourhood plan should not give the detail of the boundaries too much weight, and it may be better to draw own boundaries within the context of the regionally important corridors, based on detailed local knowledge and aspirations, as have been done with 'the Walton Fringe'.	The PC maintains its Regulation 14 position, i.e., that the NP uses the 2010 work boundaries as a necessarily broad starting point and interprets them at a local level relative to local geography – in effect drawing own boundaries as suggested. Experience from other NPs indicates that this approach, based on the 2010 work, has found favour with examiners/other LPAs alike, with the resultant areas/boundaries approved in made NPs, e.g. Haworth.
Appendix 2: Local Green Space Assessments	NYC (PBBNP39)	-As landowner, HBC do not support the allocation of Almsford Wood as Local Green Space under Policy GNE3 as we do not consider it to have demonstrable value to the local community of Pannal and Burnbridge. The site is not in close proximity or in easy walking distance to the community of Pannal and Burn Bridge due to the site being detached and not related to the village and on the other side of the A61 which needs to be crossed to access this site. The assessment for this site refers to a link path west going	The LGS assessment supporting the proposed designation of this site (ref Appendix 2) makes it clear that the site particularly serves the closely situated Harrogate communities of Fulwith/Daleside and Stone Rings, that Pannal/ Walton Park are 1km distant and

		<p>under the A61 road bridge linking the path to the pavement on the other side of the A61 however this needs to be clarified as this information conflicts with Policy GHE6 which refers to the need for an underpass. There is not to our knowledge a way of safely accessing this site underneath the A61.</p> <p>-As the site contains significant woodland, it is covered adequately by Local Plan policy NE7: Trees and Woodland and is sufficiently protected by other Local Plan policies such as HP5: Public rights of Way and NE3: Protecting the Natural Environment.</p>	<p>that the site also serves a wider community of visitors/walkers given its location on a well-used part of the PROW network. There is nothing in the LGS criteria to say that LGS within a Neighbourhood Area cannot have community value to proximate communities outside the area. It is maintained that the site does meet LGS criteria and that GNE3 adds to and strengthens Local Plan policies covering the site. The underpass reference/ inconsistency was removed prior to submission and does not appear in the assessment as asserted.</p>
	Individual (PBBNP18)	<p>I would also like to comment on section 5.1.26 (p.18 and p.67) regarding Sandy Bank Wood. I very strongly support the proposed protective designations for Sandy Bank Wood, which is a little wildlife haven, a small sanctuary for chiffchaffs, great tits, blue tits, great spotted woodpeckers, and many other birds, as well as a beautiful and tranquil place for humans.</p>	<p>The PC welcomes the support.</p>
	CPRE North & East Yorkshire (PBBNP36)	<p>The additional information in relation to Local Green Space proformas and key vistas is welcomed for the sake of clarity.</p>	<p>The PC welcomes the supportive comment.</p>
Appendix 3: Key Views & Vistas	CPRE North & East Yorkshire (PBBNP36)	<p>The additional information in relation to Local Green Space proformas and key vistas is welcomed for the sake of clarity.</p>	<p>The PC welcomes the supportive comment.</p>
Policies Map	NYC (PBBNP38)	<p>Whilst the numbers have been added to the maps it is still very unclear where the 3 areas specifically are. It is very difficult to see where one area starts and one area finishes. If the policy states</p>	<p>The PC totally disagrees with this view and considers that the Policies Map makes it abundantly clear</p>



		that there are 3 areas then despite them having the same policy coverage, it is important to be able to identify the separate named areas.	where the boundaries between the 3 areas lie and which area is which.
	NYC (PBBNP38)	There is a lot of information on the policies map with similar colours and shading which makes it difficult to read – concern still remains.	The PC disagrees. The Policies Map colours and shadings are no more or less difficult to read than any other Policies/Proposals Map, including those produced for Local Plans, including the Harrogate District Local Plan. As maps these days are invariably viewed electronically, the zoom facility renders all designations/notation abundantly clear.
	NYC (PBBNP38)	Spacey Houses Whin potential SINC is shown as SINC (3) on the Policy Map. It has been assessed as qualifying by the North Yorks SINC Panel but has not yet been designated in the Local Plan (hopefully to be put forward in the Local Plan Review). NYC would support designation as a SINC, subject to the agreement of the SINC panel.	The PC welcomes the support.
Strategic Environmental Assessment Screening	Natural England (PBBNP31)	Screening Request: Strategic Environmental Assessment It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.	The PC notes the response.
Habitat Regulations Assessment	Natural England (PBBNP31)	Natural England agrees with the report's conclusions that the Pannal & Burn Bridge Neighbourhood Plan would not be likely to	The PC notes the response.

		result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.	
NP General	NYC (PBBNP38)	Update references to HBC and NYCC to reflect the creation of NYC.	The PC acknowledges that such updating will be required.
	NYC (PBBNP38)	(1)-Care is needed to ensure the Harrogate District Local Plan 2014-2035 is either referred to as the Local Plan or Harrogate District Local Plan rather than Harrogate Local Plan, which implies it only covers Harrogate rather than the whole district. Some amendments have been undertaken but it is not consistent throughout the whole plan. -Need to ensure that the correct reference is made to 'Development Plan' rather than local plan.	(1) The PC endeavoured to amend the plan as requested following a Regulation 14 comment to this effect and considered it had successfully done so. It would be helpful if NYC could specifically highlight where references still need to be amended to save review of the whole document once more. (2) The PC finds this comment confusing and seemingly in conflict with (1), where it is stated that reference should be to the Local Plan. Could this be clarified – is it a distinction between Local Plan (specific) and local plan (generic) that is being made? Again it would be helpful if instances in the text could be highlighted where amendment is requested.
	NYC (PBBNP38)	Need to be clearer what evidence has fed into policy development. It is not clear from every policy what the policy base or justification is.	The PC maintains its Regulation 14 position, i.e., that it is considered that the NP is clear on this. Where a comment such as this is made, it would be helpful if the respondent

			could indicate where it is felt evidence should be clearer.
	NYC (PBBNP38)	It is clear that significant work has taken place in order to develop the plan and I wish to commend all those involved for their hard work and commitment.	The PC welcomes the comment from NYC, but would like to put on record its view that in its comments, NYC has a tendency to seek to micromanage NP content and to at times focus unduly on plan minutiae and detail. There is also a tendency, at times, to raise matters of preference rather than concerns relating to the basic conditions.
	York Consortium Drainage Boards- Ainsty (2008) Internal Drainage Board (PBBNP11)	Thank you for the opportunity to comment on this Neighbourhood Plan. However, this area sits very far outside of the Board's drainage district. As such, the Board has no comment to make	The PC notes the comment.
	Canal & River Trust (PBBNP14)	Thank you for your consultation. Having assessed the location of the Neighbourhood Plan boundary compared to our network, the Trust do not wish to make any comment on the proposal.	The PC notes the comment.
	The Coal Authority (PBBNP30)	Having reviewed your document, I confirm that we have no specific comments to make on it.	The PC notes the comment.
	Natural England (PBBNP31)	We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect. We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan.	The PC notes the comment.

	National Grid Electricity Transmission (PBBNP35)	An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.	The PC notes the comment.
	National Gas Transmission (PBBNP34)	An assessment has been carried out with respect to National Gas Transmission (NGT) assets which include high-pressure gas pipelines and other infrastructure. NGT has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.	The PC notes the comment.
	CPRE North & East Yorkshire (PBBNP)	CPRENEY welcome and strongly support the submission draft version of the Pannal and Burn Bridge Neighbourhood Plan and commend the Pannal and Burn Bridge NDP Steering Group for their efforts. The whole document reads well and provides the community, planners and developers with sufficient clarity and information that should help deliver the vision and aims of the plan. The detailed policies map should aid this further.	The PC welcomes the support.
	Historic England (PBBNP37)	We declined to comment upon the Pre-Submission Draft of the Pannal and Burn Bridge Neighbourhood Plan in our letter of 31 <sup>st</sup> May 2022, and do not wish to make any further comment at this time.	The PC notes the comment.
	Gladman (PBBNP33)	The Neighbourhood Plan Steering Group should be cognisant of the wider 'levelling up' agenda and consequential implications it could have on the planning system, including possible changes to the application of the standard method which could have significant impacts on the level of growth required across the wider area.	It is the PC's understanding that the NP is examined against the basic conditions, including the adopted development plan and national planning policy, and not against potential changes to the planning system which may or may not

			occur in line with the levelling up agenda, or otherwise.
	Gladman (PBBNP33)	The Parish Council should be mindful of these changes ( <i>NB potentially to national planning policy</i> ) and the potential impact to the PBBNP and the need to undertake a review of the neighbourhood plan following the Plan's adoption. Further details on this matter are set out in section 3 of these representations.	It is the PC's understanding that the NP is examined against the basic conditions, including current national planning policy, and not against potential changes to the planning system. Any review will be undertaken at the PC's discretion at a time of its choosing.
	Individual (PBBNP26)	Overall comment – The Neighbourhood Plan reads well and is understandable being free of planning jargon. The Parish Council and those other representatives of the village community involved in the preparation of the plan should be congratulated on producing a comprehensive Plan which I fully support.	The PC welcomes the support.