

Harrogate Borough Council
Department of Development Services
Knapping Mount
Harrogate
HG1 2AE



19th February 2014

Dear Sirs,

Re: Planning Ref 14/00259/OUTMAJ – Housing on Crag Lane

I am writing on behalf of Pinewoods Conservation Group (PCG) regarding the proposed planning development of 124 dwellings on Crag Lane. As we feel this development would directly and permanently impact on The Pinewoods in a negative manner we would like to formally object to the application.

The Pinewoods consists of around 96 acres of woodland situated adjacent to the site. The Pinewoods form a key link from Valley Gardens to RHS Harlow Carr, the 2 largest tourist attractions in Harrogate. The PCG is a registered charity whose main objective is to promote the maintenance and conservation of The Pinewoods. As such these plans are contrary to our objectives.

I suspect that many other objections will be received that will focus on the general issues regarding these plans including; traffic and access issues, lack of general infrastructure, concerns on drainage and flooding, impact on Police response times and the area not being included in the Local Development Framework as a preferred site. However, our main concern is the negative impact on the ecology, diversity and sustainability of The Pinewoods and surrounding areas.

Although we note that the application includes the mandatory biodiversity check lists and ecological surveys these could be seen as misleading and in cases are factually incorrect (i.e. refers to 109 dwelling). We would also dispute the Biodiversity check list that indicates that no protected species surveys are required with regards to impact upon woodland and field hedgerows.

As such they should be reviewed further. As such our main points of concern are as below:

- **Special Landscape Area:** The site is currently outside the development limit and within a Special Landscape Area. The site is part of a “green wedge” that extends from the town centre to the south-west. With dwellings down the long side of Pinewoods the vista will be severely restricted with natural light into the woods also reduced. As such it is essential that this area remains undeveloped to ensure this green lung of Harrogate remains intact.
- **Birds:** The applicants own ecological survey makes reference to the wide and varied species of birds that can be identified in the area, some of which are protected and notable. This open space adjacent to woodland is a key area for birds to feed and nest. Development of this land would ensure this is lost for ever. The presence of Owls should also be noted that is not mentioned within the report.
- **Bats:** The ecological survey makes reference to evidence of bats. The PCG can confirm that Pipistrelles bats do exist within The Pinewoods and in substantial numbers. Recent surveys carried out by licenced bat handlers have identified over 20 bats within erected bat boxes

within The Pinewoods. Actual numbers with natural roosting habitats could be much higher. Evidence of bats being present during hibernation seasons has also been identified. These bats can be seen using the proposed site for feeding so will be impacted by any development. The report itself acknowledges that the site would be a good source of foraging for bats.

These bats are accepted by H.M. Government as an environment performance indicator and as well as being protected species should be seen are permanent residents of the area. The Natural England consultation reply highlights the standing advice that should be adopted should protected species be evident. It should also be noted that a number of bat boxes are on the perimeter of the site.

- **Badgers:** The ecological survey suggests no evidence of Badgers on the site or within 2km. Any regular visitor to the area will know this not to be the case and further details can be supplied confidentially due to the sensitive nature. As such further recommendations should be made to address the impact on this species.
- **Established Trees:** A number of established trees and their roots may be impacted by these plans, a number of which are protected by Tree Protection Orders. The councils own arboricultural report covers the concerns more fully and notes the "Saved" Policy HD13 Trees and Woodland that protects against proposals that would involve the loss of trees or woodland.
- **Hedgerow:** Impact on hedgerows is identified as a concern within the report where it is acknowledged that their removal could impact on nesting birds. These hedgerows will also support a wider range of ecology that is not acknowledged within the report. The loss of any established hedgerow will take many years to be replaced.
- **Light Pollution:** The site if developed will introduce unnatural light to The Pinewoods. This will have a negative impact on the wildlife within it, especially those of a nocturnal nature.

It can be clearly seen that approval of this site would have a severe detrimental impact on the surrounding area and nature, not only within the site but around it. As such it should be fully rejected.

Yours faithfully,



Neil Hind
Vice Chair of Pinewoods Conservation Group
On Behalf of Pinewoods Conservation Group Committee