

Case No. 19/05245/DVCMAJ

Item No.01

Location: Harrogate Spa Water Limited, Harlow Moor Road, Harrogate, HG2 0QB,

Proposal: Variation of Condition 1 (Reserved Matters) to include reference to the Design and Access Statement Addendum of planning permission 16/05254/OUTMAJ - Outline application for the extension to existing bottling facility and associated works with access considered.

Applicant: Harrogate Spring Water Ltd

SUMMARY

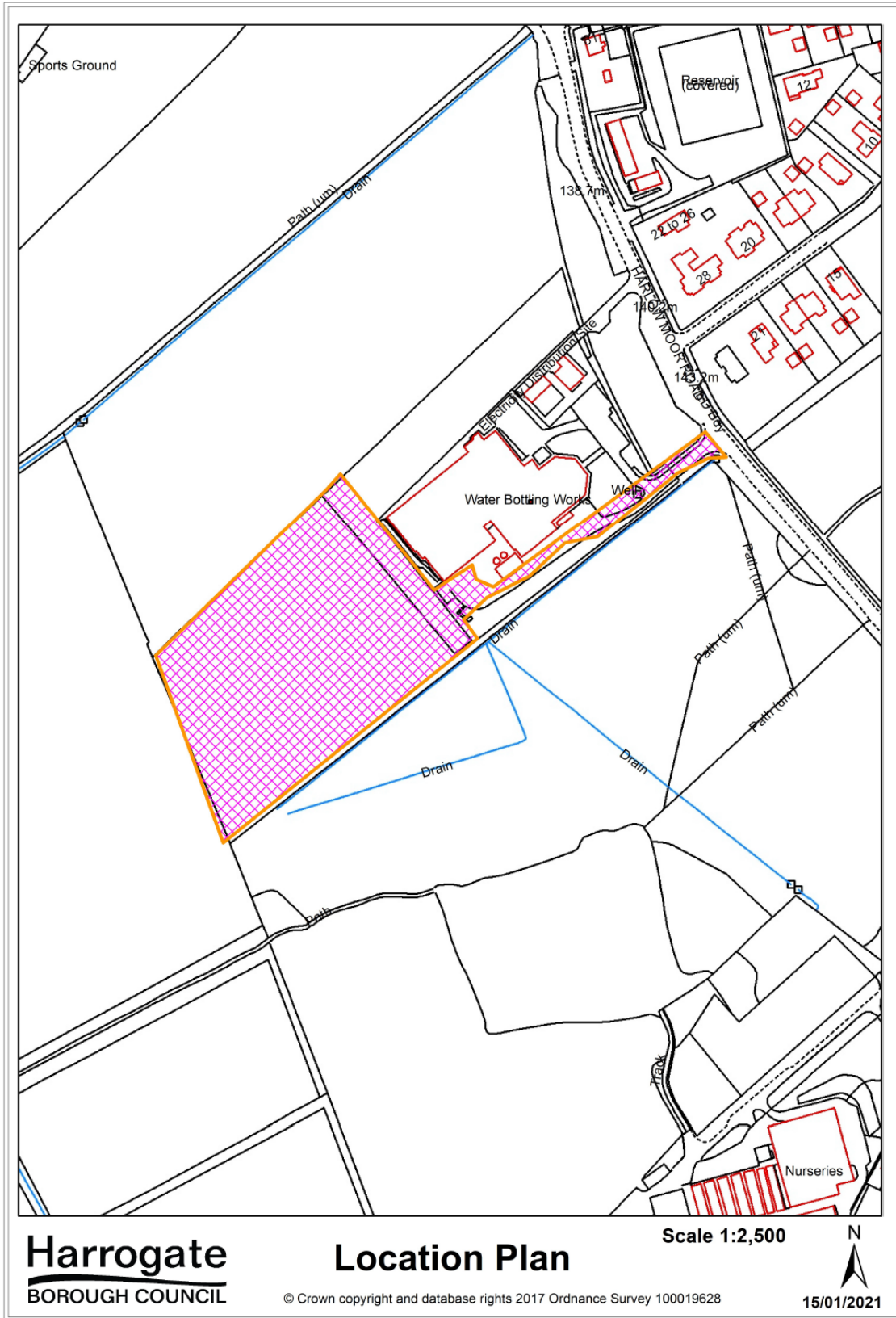
In 2016 outline planning permission was granted for the extension of the bottling plant at Harrogate Spa Water Ltd. (HSWL) (Ref 16/05254/OUTMAJ).

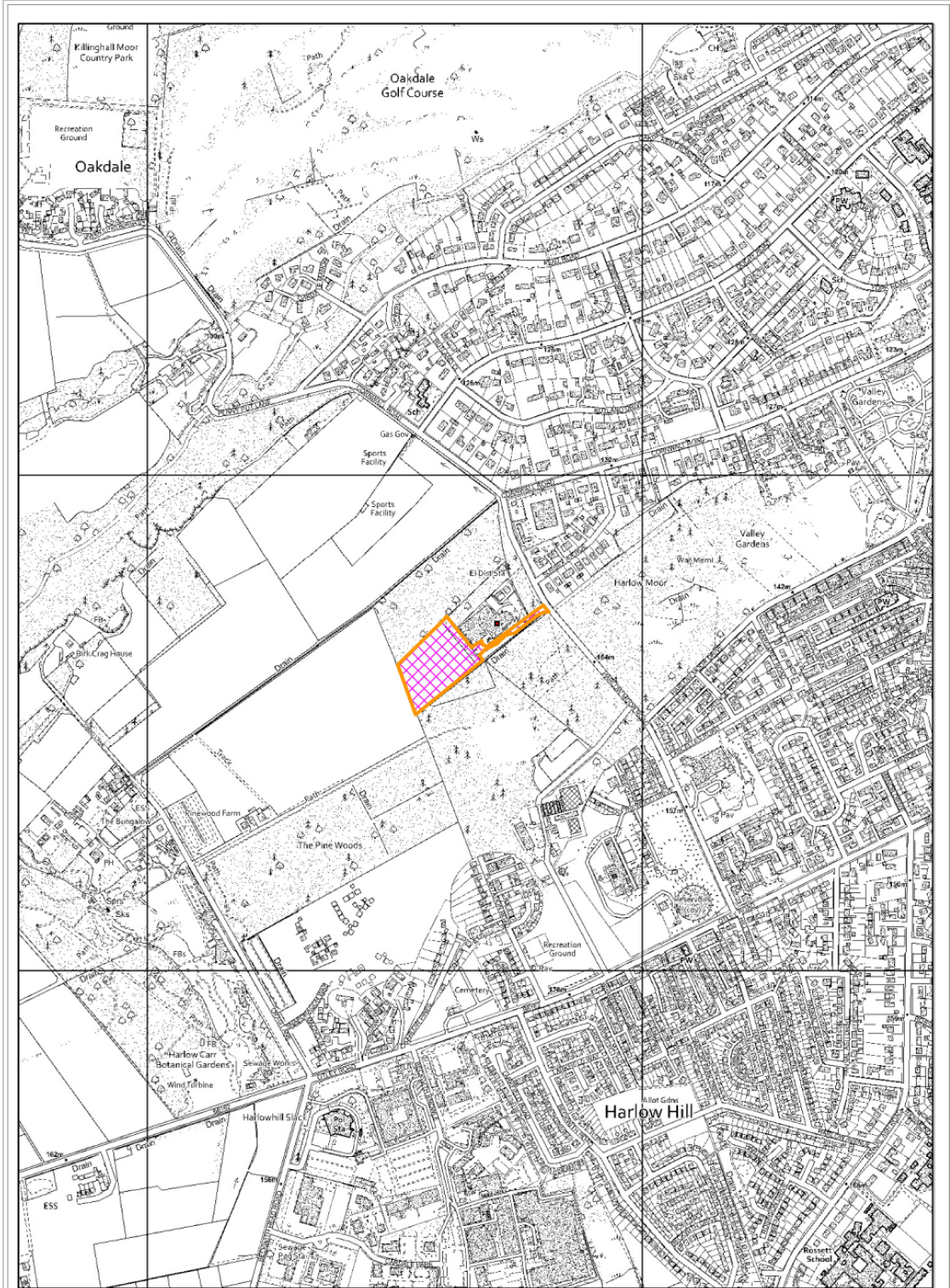
Condition 1 of the outline permission set a series of parameters for the size of the approved extension. The applicant has now applied to vary this condition to allow a larger extension to be built. This would be approximately 40% larger than that approved under the existing outline permission.

The proposed development involves the further loss of trees and biodiversity and an off-site compensation site has been identified and will be secured by a s106 agreement.

The land is classified as an Asset of Community Value (ACV) and this is a material planning consideration.

RECOMMENDATION: Defer and Approve subject to conditions and a s106 agreement securing the biodiversity compensation site.





Harrogate
BOROUGH COUNCIL

Site Plan

Scale 1:10,000



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15/01/2021

1.0 PRELIMINARY MATTERS

- 1.1 Access to the case file on Public Access can be found here:- [view file](#)
- 1.2 This application is to be presented to the Planning Committee as the proposal is considered to be sensitive, controversial and significant.

2.0 MAIN ISSUES

2.1 The main issues are:

- Policy
- Economic Development
- Trees
- Landscape
- Biodiversity
- Public Amenity
- Highways
- Conservation Area
- Residential amenity
- Drainage
- Single plastic use
- Carbon sequestration
- Asset of Community Value

3.0 PROPOSED DEVELOPMENT

- 3.1 Harrogate Spa Water (HSWL) is located off Harlow Moor Road, immediately to the north of the Pine Woods and just outside the Harrogate Conservation Area. There is vehicular access directly off Harlow Moor Road with parking and turning to the front of the building and access for delivery vehicles along the south side. The building and associated hardstandings sit within a large fenced compound, with much of the land to the north being open mown grassland.

- 3.2 Since 2007 the plant has operated 24-hour shifts except on Sundays, i.e. from 1900 hours on Sundays to 1900 hours on Saturdays.
- 3.3 In November 2010 planning permission was granted to extend the delivery hours to between 0630-2230 hours, Monday-Saturday, but not on Sundays or Bank Holidays (Ref 10/03772/DVCON). In July 2015 permission was granted to allow no more than 15 deliveries to be made between the hours of 22:30 and 06:30 (Ref 15/00996/DVCON). This means deliveries can be made to the site 24 hours a day, albeit at restricted rates throughout the night.
- 3.4 In 2010 outline planning permission was granted for an extension, set back from the north elevation of the original building (Ref 11/01271/OUT). Reserved matters were approved in 2013 (Ref 12/00518/REM) and this extension has now been built.
- 3.5 In 2017 outline planning permission was granted for an extension to the rear of the building (Ref 16/05254/OUTMAJ).
- 3.6 The approved extension would be on the rear (west) elevation of the building. The application was in outline, with only access for consideration at that stage. However the application was accompanied by a Design and Access Statement (DAS), which includes two Illustrative Masterplans; Option A and Option B. The DAS also included a series of Parameter Plans, setting limits for the heights and footprints of the proposed extension.
- 3.7 The approved extension would have provided an additional 5,500 sqm. of floorspace.
- 3.8 Condition 1 of outline permission reads:

'No development shall take place without the prior written approval of the Local Planning Authority of all details of the following reserved matters –

- (a) access;*
- (b) appearance*
- (c) landscaping*
- (d) layout; and*

(e) *scale.*

The reserved matters shall be in accordance with the Design and Access Statement, in particular the Development Parameters Plan (Fig 17) and Scale and Massing Plan (Fig 18).

Thereafter the development shall not be carried out otherwise than in strict accordance with the approved details.'

- 3.9 The Development Parameters Plan (Fig 17) shows a development area of 0.77ha.
- 3.10 The Scale and Massing Plan (Fig 18) shows the maximum dimensions for each of the three elements of the proposed building. None of the elements would be higher than 10m.
- 3.11 The applicant has decided that the growing needs of the business will not be met by the extension approved under Ref 16/05254/OUTMAJ given the size restrictions cited in Condition 1.
- 3.12 It is therefore proposed to amend Condition 1 of permission Ref 16/05254/OUTMAJ to allow for a larger extension to be built.
- 3.13 The proposed amendments would allow a development area of 0.94ha. A building of up to c4800sqm was approved by the outline permission. A building of up to c6800sqm is now proposed. This represents a 40% increase in floorspace. The proposed amendment has been submitted in the form of an Addendum to the original DAS, which could be conditioned as before.
- 3.14 It is worth noting that, as before, the proposal represents the largest possible 'envelope' in which any extension could be built. It may well be smaller, depending on the size of the production lines which need to be accommodated within.

4.0 ASSESSMENT

4.1 Policy

4.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The adopted Local Plan is the starting point for determination of any planning application.

4.3 The Harrogate District Local Plan 2014-2035 was adopted by Harrogate Borough Council on 4 March 2020. The Inspectors' Report concluded that, with the recommended main modifications which are set out in his report, that the Harrogate District Local Plan satisfies the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) and meets the criteria for soundness in the NPPF. All the policies in the Local Plan can therefore be given full weight.

4.4 Economic Development

4.5 The National Planning Policy Framework (NPPF) states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. (para 80).

4.6 Paragraph 80 of the NPPF goes on to state that this is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

4.7 Local Plan Policy EC2 states that proposals for the expansion of existing businesses in open countryside and outside established employment areas will be permitted where certain criteria are met. These include:

A. There is a proven need for such development in terms of business opportunity or operational requirements;

- B. The proposed development cannot physically and reasonably be accommodated within the curtilage of the existing site;
- C. The scale of development is appropriate in the proposed location;
- D. There is no unacceptable impact on the character of the countryside, the surrounding landscape, the form and character of the settlement or biodiversity;
- E. There is no unacceptable impact on the operation of the highway network;
- F. There are no significant adverse impacts on residential amenity.

- 4.8 It is considered that there is a proven need for the proposed development in accordance with criteria A. Similarly, it is clear that the proposed extension cannot be accommodated within the existing site curtilage, in accordance with criterion B.
- 4.9 In terms of the other criteria, these issues are considered further in the report.
- 4.10 The application is accompanied by an Economic Benefit Statement. This states that HSWL currently employs 90 people, an increase of 70% since 2015. It is estimated that an extension of the size originally approved would create an additional 32 jobs, taking the total to 122.
- 4.11 A development of the size now proposed would generate 3 production lines that, at capacity, could support 75 employees. This in turn would create an additional 12 posts, making an overall increase in staff of 87.
- 4.12 The Statement claims a potential increase of 87 employees would generate a further £3.8m in GVA per annum. In addition, the construction phase would create 78 direct construction jobs over 18-month period and add c£740,000 to the local economy.
- 4.13 The proposed development of 6,800 sqm could also generate c£130,000 in additional business rates.
- 4.14 The proposed development has the full support of the Council's Economic Development Officer, who recognises HSWL as a 'Strategic Employer'.

4.15 Trees

- 4.16 Local Plan Policy NE7 (Trees and Woodland) states that development should protect and enhance existing trees that have wildlife, landscape, historic, amenity, productive or cultural value or contribute to the character and/or setting of a settlement, unless there are clear and demonstrable reasons why removal would aid delivery of a better development.
- 4.17 This policy goes on to state that development that results in the loss of, or damage to trees will be required to provide replacement trees on-site or, if this is not possible, compensatory planting off-site that is equivalent to the public value of the trees to be removed.
- 4.18 Although still relatively young, there can be no doubt that the additional woodland that would be lost has value in terms of landscape and wildlife. Having been planted by voluntary groups and schools there is also a wider amenity and cultural value that cannot be ignored.
- 4.19 The development now proposed would result in the potential additional loss of 0.17ha of woodland, over and above that lost under the approved extension.
- 4.20 The Council's Arboricultural Officer has objected to the proposed development based upon the potential impact to the existing woodland, which would result in an overall net loss of woodland area and cover.
- 4.21 However, the Arboricultural Officer has accepted that there is the possibility of securing compensatory planting off-site. In order to overcome this objection, an area equal in size and appropriateness for woodland planting would need to be identified and allocated, preferably currently attached in some way to the Pinewoods
- 4.22 In terms of compensatory off-site tree planting, the applicant has identified a nearby site which could accommodate additional tree planting as well as acting as a compensation site for loss of biodiversity (see Biodiversity).

- 4.23 However it is also worth noting that this application seeks to vary an existing outline permission. Landscaping is a Reserved Matter, not for consideration at this stage. Thus, while there is no doubt that a significant number of trees will be lost, the precise number (and therefore the amount of replacement planting required) will not be known until applications have been submitted for the Reserved Matters of Scale, Layout and Landscaping.
- 4.24 It may be, for instance, that the biodiversity compensation site has sufficient capacity to accommodate replacement trees on a 2:1 basis without compromising the biodiversity gains. If this site does not have the capacity to accept all the replacement trees then the applicant would need to find an additional site for such planting. Subject to adequate compensatory tree planting the proposed development would meet the requirements of Policy NE7.
- 4.25 While the extant outline permission includes a condition requiring the submission of a scheme of landscaping, there was no specific requirement for the planting of trees on a 2:1 basis. The applicant is content that such a condition be added to any new permission granted. Furthermore, the applicant has committed to replace all the trees which will be lost, including those already accounted for by the approved extension.
- 4.26 At the suggestion of the Arboricultural Officer, the newly planted trees on the compensation site would be protected by a TPO.
- 4.27 **Landscape**
- 4.28 Local Plan Policy NE4 (Landscape Character) states that proposals that will protect, enhance or restore the landscape character of Harrogate district for its own intrinsic beauty and for its benefit to the economic, environmental and social well-being of the district will be supported.
- 4.29 The policy goes on to state that this will be achieved by resisting development which would harm or be detrimental to the character of the local and wider landscape or the setting of a settlement.

- 4.30 The application site is within a Special Landscape Area (SLA) (Oak Beck Valley to the west of Harrogate including Birk Crag and Cardale Wood) as listed in Policy NE4.
- 4.31 The SLAs are valued locally for their high quality landscape and their importance to the settings of Harrogate, Knaresborough and Ripon. The designation reinforces the importance of these landscapes and their high sensitivity to inappropriate development which would adversely impact on the quality of the area designated.
- 4.32 The proposed development would increase the footprint by approximately 40% resulting in increased visibility of the roofscape particularly when viewed from Penny Pot Lane and Oaker Bank to the northwest and west respectively. A large area of recently planted woodland would also be lost which would further reduce any long-term screening mitigation of the development. In mitigation, the development would be sunk down into a rising landform and not placed on top and therefore likely elevations would be no worse than existing.
- 4.33 There is no doubt that the proposed development would harm the character and appearance of the SLA due to the loss of trees and the incursion into a greenfield site. The proposed development would also adversely impact on nearby visual receptors including in particular nearby footpaths linking town centre through Valley Gardens with RHS Harlow Carr Gardens and surrounding countryside to the northwest and west.
- 4.34 As a consequence of the increased footprint, opportunities for planting around the extension would be reduced to narrower margins. The effectiveness of any additional woodland screening would also be impeded by the formation of 'cut' slopes shown on the illustrative masterplan graded to 1:3 and necessary to accommodate the building extension within a sloping landform. However the development would be sunk down into a rising landform, which would go some way to mitigate landscape harm, together with the use of a green roof. That said, it is highly likely that visibility of built form elevations would be worse than existing due to the now

limited amount of available space for effective mitigation woodland screening measures.

4.35 While compensatory tree planting could be secured elsewhere, this would not be able to mitigate the landscape impact of the proposed development, contrary to Local Plan Policy NE4.

4.36 **Biodiversity**

4.37 Local Plan Policy NE3 (Protecting the Natural Environment) states that proposals that protect and enhance features of ecological and geological interest and provide net gains in biodiversity will be supported.

4.38 This will be achieved by, inter alia, requiring proposals for major developments to avoid any net loss of biodiversity and supporting schemes which achieve a net gain.

4.39 In response to this policy requirement the applicant has submitted Biodiversity Net Gain Proposals (Brooks Ecological). The applicant has identified a parcel of land which would be managed to create areas of broad-leaved woodland, a pond, and other habitats which would be lost as a result of the proposed development.

4.40 The parcel of land is to the west of the application site and, like the application site, sits between the Pinewoods and Birk Crag woodland, to the north of Harlow Carr Gardens. It comprises three fields in private ownership.

4.41 These proposals are accompanied by a Biodiversity Metric 2.0 Calculation Tool, completed in accordance with the currently most up to date version of the DEFRA Metric 2. This is essentially an audit of the biodiversity of the application site and the compensation site. This tool allows an objective assessment of whether or not there will be no net loss of biodiversity in accordance with Policy NE3.

- 4.42 Details of the proposed compensation site were published on Public Access and all representors informed.
- 4.43 The Pinewoods Conservation Group commissioned Smeeden Foreman to comment on the report. Smeeden Foreman have questioned some of the baseline assessments of the existing habitat. In response, the applicant's ecologists, Brooks Ecological have defended the documents, but acknowledge that more detailed work will need to be done at the Reserved Matters stage. This can be secured by a planning condition.
- 4.44 The Council's Ecologist considers that these documents provide an adequate assessment of the current site and subsequently propose adequate compensatory planting on the offset site in order to demonstrate that it will be possible to meet the requirement for no net loss of biodiversity under policy NE3.
- 4.45 The Ecologist concurs with Brooks' conclusion that much of the 2005 woodland comprises 'young trees' where the canopy is not yet closed. Although the woodland does appear to meet most of the formal criteria to achieve 'moderate' condition, its obvious immature status may justify Brooks' classification of the current condition of this woodland as 'fairly poor'. The biodiversity metric has an inbuilt 'temporal risk' factor, together with a 'difficulty of habitat creation' factor that takes into account the difference between newly created and previously existing woodland, acknowledging that they cannot be replaced on a 1:1 basis.
- 4.46 Slightly less new woodland would be created on the compensation site than would be lost, with the remainder of habitat credits being made up from the creation of other habitats. In the opinion of the Council's Ecologist, the results of the metric calculation are sufficient to provide comfort that the Reserved Matters application will be able to deliver adequate biodiversity compensation to meet the requirements for no net loss in NE3.

- 4.47 The Ecologist also considers that the location of the proposed compensatory planting does help maintain ecological connectivity between Pine Woods and Birk Crag, via the woodland and other biodiverse treed landscapes of Harlow Carr Gardens.
- 4.48 While the Biodiversity Audit demonstrates that the proposed development can meet the criterion of 'no net loss of biodiversity' as required by Policy NE3, in the opinion of the Council's Ecologist this is marginal, and there is very little room for manoeuvre for the applicants. If there are any changes to the scheme at the Reserved Matters stage, it may therefore be necessary to review the detail of the audit at the time of the Reserved Matters application to ensure that 'no net loss' of biodiversity will still be achieved. This can be required by a planning condition.
- 4.49 It is also worth noting that the biodiversity audit is quite narrowly focussed and does not address other matters of 'public value' of woodland, such as those which may need to be addressed in relation to Local Plan Policy NE7 (para 4.16).
- 4.50 It is considered that an ecological mitigation and management plan for the existing woodland should also be required by condition This would need to include measures to avoid harm to protected and priority species during construction (including timing of vegetation removal and up-to-date pre-commencement data checks and surveys where required) as well as an agreed mechanism for establishment, management and monitoring of the retained and proposed new habitats and for translocation of the hybrid orchids to a suitable receptor site.

- 4.51 The future long-term management of the compensation site can be secured by a s106 agreement.
- 4.52 However, while this site may compensate for the loss of biodiversity and potentially trees, it cannot wholly compensate for the loss of public amenity, since it is on private land.
4. 53 **Public Amenity**
- 4.54 The larger extension now proposed would develop an area of the Rotary Woods which is currently used by the general public as a 'cut through' from Irongates Field to the Pinewoods. A number of well-walked pedestrian desire lines are evident through the site linking what is locally known as the cinder path to north with the Panorama Walk footpath to the south. Due to the damp nature of the woodland, these paths can become quite muddy.
- 4.55 The proposal would include an element of public access across the remaining open space to the west. However there is no doubt that the proposed development would lead to a loss of public amenity.
- 4.56 The compensation site is on private land. However it is surrounded on four sides by public rights of way, including a bridleway adjacent to the northeast boundary, and a footpath along the southeast boundary. So while there would be some public amenity benefits, the fact that the site itself would not be available to the public means there would be an overall disbenefit.
- 4.57 While such amenities are not protected by Local Plan policies, and these are not public rights of way, this loss of public amenity does weigh against the proposed development.
- 4.58 **Highways**
- 4.59 It is considered that the proposed development would not materially impact on the local or wider highway network. The Highway Authority has no objection to the traffic generated by the proposed development.

4.60 While the plant operates over a 24 hour period, there are already conditions in place restricting night-time deliveries (22:30 to 06:30 hours) to 15.

4.61 Any proposed changes to operating hours or night-time deliveries would require an application to vary existing conditions.

4.62 Conservation Area

4.63 Harlow Moor Road forms the boundary to the Harrogate Conservation Area, so the site lies outside, but adjacent to the Conservation Area.

4.64 However, the application is outline only, with only access into the site for consideration at this stage. The proposed extension would be to the rear of the existing building, further away from the Conservation Area. The proposed extension would be viewed in the context of the existing HSW buildings, and the electricity sub-station which fronts onto Harlow Moor Road.

4.65 It is considered that the proposed development would not harm the setting of the Conservation Area.

4.66 Residential amenity

4.67 The site already has the benefit of 24-hour operation and deliveries (restricted to 15 through the night), and the proposed development would not alter this existing situation. Any proposal to increase the number of night-time deliveries would require a separate application to vary the existing limiting condition.

4.68 Drainage

4.69 The site is wholly within Flood Zone 1, which is at low risk of fluvial flooding. At present, foul and surface water discharge to the respective sewers in Harlow Moor Road. Two attenuation tanks beneath the car park restrict surface water discharge to 5 litres per second (l/s). Available storage within these tanks will maintain discharge rates at 5l/s. The Council's Drainage office and Yorkshire Water have no

objection to the proposed development, subject to the retention of the condition restricting surface water outflow rates.

4.70 Single plastic use

4.71 Many of the objections are not site specific, but refer to the use of single use plastics for bottling water. It is argued that the enlarged extension being proposed would inevitably lead to an increase in the use of single use plastics.

4.72 However this is not a material planning consideration, notwithstanding the sustainable thread running through the NPPF and Local Plan policies.

4.73 While the extension is clearly intended to increase production, in planning terms it is simply an extension to an existing B2 (Industrial) Use. There is no direct causal link between the size of the extension and the amount of plastic being used. Indeed, it could be argued that the additional production lines increase the opportunities for diversification in terms of bottling, e.g. through increased use of glass or tetrapacks. Furthermore, it would be unreasonable for the local planning authority to impose a condition stating that no plastic bottles should be used in the proposed extension. The use of packaging is regulated by specific legislation and is the subject of other forms of control unconnected with the planning system.

4.74 Therefore, despite the concerns of objectors on this issue, it is considered that the potential increase in use of single use plastics is not a reason to refuse this application.

4.75 Carbon sequestration

4.76 A further ground for objection is that the proposed development would not be carbon neutral and fails to accord with the Council's Carbon Reduction Strategy 2019.

4.77 Local Plan Policy CC4 (Sustainable Design) requires all developments of more than 1000sqm to submit an energy statement demonstrating how the energy hierarchy set out in that policy has been applied.

4.78 However as the application relates to an outline permission it is not possible for the applicant to submit such a statement at this stage. The applicant would be expected to submit an energy statement with the application for the relevant Reserved Matter. This would be the subject of a planning condition.

4.79 Asset of Community Value

4.80 The application site is part of the larger Pinewoods site, which is designated as an Asset of Community Value (ACV). This means that, were the Council (as landowner) minded to dispose of this land there would be a 6-week moratorium period where the Council could not dispose of it and this would be publicised in the press.

4.81 If, during this moratorium period, a written request to be treated as a potential bidder were received from a local community interest group, then a full moratorium period of 6 months would apply. This gives local community groups the opportunity to put an offer together and place a bid. The asset cannot be sold during this time unless it is to a local community interest group.

4.82 It is open to the local planning authority to decide that listing as an ACV is a material consideration in this case.

4.83 Officers consider that the ACV is a material planning consideration, which should be afforded weight, but it is not sufficient on its own to outweigh the recommendation.

5.0 PLANNING BALANCE AND CONCLUSION

5.1 HSWL is considered to be a Strategic Employer, making a significant contribution to the local economy. Employee numbers have increased steadily over the years and the levels of financial investment in the business have also been significant. The proposed development would

ensure that these trends continue and would help to 'future proof' the site for future expansion.

- 5.2 However it is HSWL's increasing role as a global brand which sets it apart from other local businesses and puts Harrogate on the international map. Paragraph 80 of the NPPF states that local business needs should be supported and should be able to capitalise on their performance and potential. This is said to be particularly important where Britain can be a global leader in driving innovation and in areas with high levels of productivity.
- 5.3 In accordance with the NPPF significant weight is placed on the need to support the growth of this business. There are significant economic benefits of the proposed development, including job creation, other financial benefits to the District and the enhancement of the Harrogate 'brand'.
- 5.4 It is acknowledged that the proposed development would result in an additional loss of trees and would harm the landscape of the SLA, contrary to Local Plan Policy NE4. It will also result in some loss of public amenity.
- 5.5 However, subject to securing the compensation site via a legal agreement, it is considered that there would be no net loss of biodiversity or trees, in accordance with Local Plan Policies NE3 and NE7.
- 5.6 While the adverse impacts of the development are recognised, on balance it is considered that the significant weight placed on the economic benefits of the proposed development outweigh these negative impacts.

6.0 RECOMMENDATION

6.1 That the application be DEFERRED and APPROVED subject to the following conditions.

Reason for Deferral:

- to allow for a s106 Agreement securing the long-term management of the biodiversity compensation site.

7.0 PLANNING CONDITIONS

- Submission of Reserved Matters (appearance, landscaping, layout, scale)
- Time limit for submission of Reserved Matters (2 years)
- Highway details to be approved
- Construction of highway works prior to occupation
- Development in accordance with Flood Risk Assessment
- Surface water discharge rates
- Hours of operation
- Noise to be inaudible at nearest sensitive premises
- Contaminated land
- Scheme of landscaping to be approved
- Submission of Energy Statement
- BREEM post construction certificate
- Landscaping scheme to include 2:1 replacement tree planting on and off-site
- Ecological mitigation and management plan for existing woodland
- Long-term management of compensation site
- Submission of updated Biodiversity Matrix 2.0

In the event of any changes being needed to the wording of the Committee's decision (such as to delete, vary or add conditions/informatives/planning obligations or reasons for approval/refusal) prior to the decision being issued, the Chief Planner has delegated authority to do so in consultation with the Chairman of the Planning

***Committee, provided that the changes do not exceed the substantive nature of the
Committee's decision.***

APPENDICES

8.0 Consultations

- 8.1 Environmental Health – Repeat conditions on permission Ref 16/05254/OUTMAJ on noise and contamination.
- 8.2 Economic Development Officer – See report above.
- 8.3 NYCC Highways And Transportation - No objection.
- 8.4 Yorkshire Water - no comments.
- 8.5 Estates Manager - No comments received.

9.0 Representations

- 9.1 310 objections received, including from Harrogate and District Green Party, Zero Carbon Harrogate, Harlow Moor Drive Association, Duchy Residents Association, Rotary Club and Pinewoods Conservation Group.
- 9.2 Grounds of objection:
 - Loss of trees and woodland
 - Existing trees have not been properly assessed
 - Loss of biodiversity
 - Loss of wildlife corridor between Pinewoods and Irongate field.
 - Loss of ACV
 - Compensation site is unsatisfactory
 - Loss of public amenity, which would not be compensated for
 - Contrary to Biodiversity Action Plan (BAP)
 - Increased use of single use plastics
 - Contrary to Harrogate Borough Council's Carbon Reduction Strategy 2019
- 9.3 28 representations received in support.

Case Officer: Mark Williams

Expiry Date:

20 March 2020