

**From:** [REDACTED]  
**To:** [Local Dev. Framework](#)  
**Subject:** FW: Representations on Publication Draft Craven Local Plan  
**Date:** 13 February 2018 17:10:09  
**Attachments:** [image005.jpg](#)  
[image006.png](#)  
[image001.jpg](#)  
[image002.png](#)  
[Publication Reps - SP4.pdf](#)  
[Publication Reps - SP8.pdf](#)  
[Publication Reps - EC2.pdf](#)  
[Publication Reps - Inset Map 2.pdf](#)  
[w10049-160531-Flood Map Review.pdf](#)  
[M10-39-08A planning applic layout.pdf](#)

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Second attempt to send the attached representations, as it appears that the email address given on the reps form is incorrect.

Kind regards,

[REDACTED]

[REDACTED]  
Partner

M [REDACTED]  
D [REDACTED]  
T [REDACTED]  
W [www.knights1759.co.uk](http://www.knights1759.co.uk)



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**From:** [REDACTED]  
**Sent:** 13 February 2018 16:53  
**To:** 'localplans@cravendc.gov.uk'  
**Subject:** Representations on Publication Draft Craven Local Plan

Good afternoon,

Please find attached 4no. completed representation forms - and the accompanying documents referred to in our representations on Draft Policy SP8 - which I am submitting on behalf of Glusburn Holdings Ltd.

Please confirm receipt of these representations.

Kind regards,

[REDACTED]

[REDACTED]  
Partner

**Knights 1759**  
The Brampton  
Newcastle-under-Lyme  
Staffordshire  
ST5 0QW

M [REDACTED]  
D [REDACTED]

T [REDACTED]  
W [www.knights1759.co.uk](http://www.knights1759.co.uk)



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**Cybercrime Alert: Bank Details**

Please be aware that there is a significant risk posed by cyber fraud, specifically relating to email accounts and bank account details. PLEASE NOTE that our bank account details WILL NOT change during the course of a transaction, and we will NEVER change our bank details via email. Please be careful to check account details with us in person if in any doubt. We will not accept responsibility if you transfer money into an incorrect account.

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## Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

### Publication Stage Representation Form

Publication draft Craven Local Plan public representations period runs from Tuesday 2<sup>nd</sup> January 2018 – Tuesday 13<sup>th</sup> February 2018.

Regulation 19-Town and Country Planning (Local Planning) (England) Regulations 2012

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**Representations must be received no later than 5pm on Tuesday 13<sup>th</sup> February 2018**

Please return completed forms to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: [localplans@cravencd.gov.uk](mailto:localplans@cravencd.gov.uk)

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

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This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

---

### Part A

#### Section 1: Personal Details

<b>Title :</b>	
<b>First Name:</b>	
<b>Last Name:</b>	
<b>Job Title (where relevant):</b>	
<b>Organisation (where relevant):</b>	Glusburn Holdings Limited
<b>Address 1:</b>	
<b>Address 2:</b>	
<b>Address 3:</b>	

Address 4:	
Postcode:	
Telephone:	
Email:	

## Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████, Knights 1759
Address:	The Brampton Newcastle-under-Lyme Staffordshire ST5 0QW
Telephone number:	██████████
Email:	████████████████████

## Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

## Section 3

Name or Organisation:	Knights 1759 on behalf of Glusburn Holdings Limited
<b>To which part of the Local Plan does this representation relate?</b>	
Section and Paragraph	
Policy	SP4
Policies Map	

## Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	✓	
2. Sound		✓
3. In Compliance with the Duty to Cooperate	✓	

Please refer to the Council's representation guidance notes at

<http://www.cravenc.gov.uk/newlocalplan>

## Section 5: Details of Representation

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.**

The draft policy wording suggests at part C that a sustainable pattern of growth will be promoted to deliver the spatial strategy of the plan over the plan period 2012 to 2032 by (inter alia) "*Directing a proportionate level of growth to Glusburn/Crosshills, Gargrave and Ingleton to underpin their roles as Tier 3 settlements (Local Service Centres)*". All three settlements are proposed to accommodate 3.5% (approx. 8 net dwellings per annum) of housing growth.

In the case of Glusburn/Crosshills this is a material reduction as compared to the 5.5% (or 14 net dwellings per annum) proposed for this area in the Preferred Sites for Housing Consultation Document (and 5.1% or 13 net dwellings per annum in the Second Draft Local Plan).

It is considered that Policy SP4 should be amended to include a higher level of housing development in Glusburn/Crosshills, given the combination of its status as a Local Service Centre and that it is a substantial centre of population in Craven (as acknowledged in Draft Policy SP8).

Glusburn/Crosshills has a good range of local amenities and additional housing development would help ensure the future vitality and viability of such services.

Further to the above, Glusburn/Crosshills is recognised as a Level 3 retail centre elsewhere in the Draft Local Plan (Draft Policy EC5), whereas the two other Local Service Centres - Ingleton and Gargrave - have a lower level retail centre (Level 4) and no recognised retail centre at all respectively. We consider this reflects the stronger potential for Glusburn/Crosshills to accommodate a higher level of development, and in turn deliver benefits to the vitality and viability of local amenities.

Furthermore, allowing for increased housing at Glusburn/Crosshills would improve the prospects of delivering the number of homes required, both locally and district wide, to meet the needs of the area (including to achieve the minimum housing provision set out within Draft Policy SP1).

With reference to the tests of soundness, it is submitted that Draft Policy SP4 is:

1. Not positively prepared - as it promotes a low level of housing growth/development in Glusburn/Crosshills that does not fulfil the potential that this area has to accommodate further

development as part of a sustainable pattern of growth, including mindful of its existing size/population, range of amenities and consequent status as a Level 3 retail centre.

2. Not justified - as it is considered that the proposed reduction in the level of housing growth/development in Glusburn/Crosshills as compared to earlier drafts of the Local Plan is not justified.

3. Not effective - as it stymies the potential for Glusburn/Crosshills to fulfil its role as a local service centre and make a more meaningful contribution to housing delivery in the district and a sustainable pattern of growth and enhance the prospects of delivering the number of homes required (both in Glusburn/Crosshills and district wide) in the plan period.

4. Not consistent with national policy - as it does not take the opportunity to enhance the potential to deliver sustainable development including a sustainable pattern of growth in the district.

In light of the above it is considered that the Draft Local Plan is unsound insofar as Draft Policy SP4 is concerned and that changes should be made to this element of the Local Plan.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

#### **Section 6: Proposed Modifications to the local plan**

**Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

It is considered that Policy SP4 should be amended to include a higher level of housing development in Glusburn/Crosshills, given the combination of its status as a Local Service Centre and that it is a substantial centre of population in Craven (as acknowledged in Draft Policy SP8).

As set out in our representations regarding Draft Policy SP8 it is considered that land in our client's ownership, to the south and west of Hayfield Mills in Glusburn (Site SC014), which is surplus to requirements is readily available for development and could accommodate such additional housing in the area (subject to it being demonstrated that such development would be acceptable from a flood risk perspective).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the representations period of the Publication Craven Local Plan has closed, further submissions will only be at the request of the Inspector, based on the matters and issues debated at the examination.

## Section 7: Participation at the Examination

<b>If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)</b>	
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>
No, I do not wish to participate at the oral examination	<input type="checkbox"/>
<b>If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:</b>	
Given the nature of our representations in response to Draft Policies SP4, SP8, EC2 and Inset Map 2, we consider that it would be beneficial to have the opportunity to explain and expand on our comments in relation to this proposed development site - and for related discussions to take place on the range of issues involved and the Council's justification for excluding the site from its proposed housing allocations despite its clear sustainability credentials and the Council's own support for allocating the site earlier in the Local Plan preparation process - as part of the oral examination.	

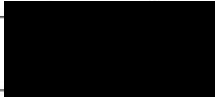
**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

## Section 8: Being Kept Informed

<b>Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)</b>	
Yes, I want to be informed	<input checked="" type="checkbox"/>
No, I don't want to be informed	<input type="checkbox"/>

**Please note** that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

## Section 9: Signature & Date of Representation

<b>Please sign and date below:</b>	
Signature	
Date	13 February 2018

After the end of the representation period the Council will submit all individual representations received to the Secretary of State, together with a summary of the main issues raised during the representations period.

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

**If you wish your personal details to be treated in confidence and not published please tick the box below:**

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
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**Please explain below, why you have made this request:**

**Craven District Council** | 1 Belle Vue Square | Skipton | BD23 1FJ |  
[www.cravenc.gov.uk](http://www.cravenc.gov.uk)

Planning Policy Team | 01756 706472 | [localplan@cravenc.gov.uk](mailto:localplan@cravenc.gov.uk)



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**If you would like to have this information in a way that's better for you, please telephone 01756 700600.**



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## Publication Stage Representation Form

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Please note each representation must be signed and dated

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<b>First Name:</b>	
<b>Last Name:</b>	
<b>Job Title (where relevant):</b>	
<b>Organisation (where relevant):</b>	Glusburn Holdings Limited
<b>Address 1:</b>	
<b>Address 2:</b>	
<b>Address 3:</b>	

Address 4:	
Postcode:	
Telephone:	
Email:	

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Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████ Knights 1759
Address:	The Brampton Newcastle-under-Lyme Staffordshire ST5 0QW
Telephone number:	██████████
Email:	██

## Part B

Please fill in a separate form for each representation

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### Section 3

Name or Organisation:	Knights 1759 on behalf of Glusburn Holdings Limited
<b>To which part of the Local Plan does this representation relate?</b>	
Section and Paragraph	
Policy	SP8
Policies Map	

## Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	✓	
2. Sound		✓
3. In Compliance with the Duty to Cooperate	✓	

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**If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.**

With regard to Site Ref SC037(a) - land at Ashfield Farm, Skipton Road, Crosshills - we note that the Residential Site Selection Process background paper indicates that the Council consider that this site comprises previously developed land. The 'Narrative of Site Analysis' includes the comment that *"The site has been used previously as farm buildings, and therefore it is a brownfield site which is suitable for development and preferable over a greenfield site". (our emphasis)*

The National Planning Policy Framework ('the Framework') includes a definition of previously developed land (within the Glossary at Annex " ), which confirms that *"land that is or has been occupied by agricultural or forestry buildings"* is excluded from the definition. On the basis of the content of the Residential Site Selection Process background paper therefore it appears that the site may be greenfield rather than brownfield land. As a result we object to the allocation of this site.

It is also noted that, whilst Draft Policy SP4 proposes housing provision of approximately 8 net dwellings per annum in Glusburn/Crosshills, the content of Draft Policy SP8 in the Pre-Publication Draft Local Plan confirmed that the Council anticipate that all 58 units due to come forward from the two site allocations in the area will be delivered in the short term (within 5 years). As a result the Draft Local Plan makes no provision for any housing to come forward in Glusburn/Crosshills in the medium and long term (from years 6 to 15).

This would also have the knock-on effect of meaning it is unlikely that any new affordable housing would be delivered in the area in the medium and long term. On the matter of affordable housing, the nature of the housing development envisaged at Site Ref. SC085 is such that it may not be viable for that development to accommodate a policy compliant level of affordable housing - or indeed any affordable housing at all (given the complexities and potential high cost of converting listed buildings).

Further to our separate representations regarding Draft Policy SP4 including in relation to the role of Glusburn/Crosshills and its existing infrastructure, it is considered that the village can and should accommodate more housing development in the plan period and that the Draft Local Plan should be amended to include an additional housing allocation(s) to achieve this; to increase the supply of both open market and affordable housing in this Local Service Centre throughout the plan period.

Furthermore we promote the allocation of land in our client's ownership, comprising land to the south and west of Hayfield Mills (SC014), for housing development. The land in question is surplus to requirements (unlike the adjoining active employment site/buildings) and readily available for development.

This site provides a sequentially preferable and lower impact alternative to deliver more homes than potential alternative additional housing sites that have been considered in the past, including greenfield sites on the edge of the urban area.

It comprises previously developed land in a highly sustainable location, in close proximity to the centre of the village and its amenities and a frequent bus service. It is also a far less prominent location than other potential additional housing allocations on the edge of the village, such that its development would have much less negative impact on the likes of the local landscape and the character and appearance of the village and surrounding countryside.

Enclosed with these representations is a copy of the indicative site layout that accompanied planning application reference 32/2010/11224 and demonstrates the site can accommodate approximately 67 dwellings (49 houses, 18 apartments) in a manner that would have an entirely acceptable impact from a technical perspective (e.g. impact on trees, ecology and residential amenity) and would also deliver an area of open space incorporating a play area. It is also anticipated that it would be viable for a scheme of this nature to deliver a policy compliant level of affordable housing.

Planning application 32/2010/11224 was withdrawn after it became clear shortly after submission of the application that the Environment Agency's (EA's) Flood Map had been amended to indicate that the site is at greater risk to flooding than had previously been envisaged, which in turn affected the apparent suitability of the site for housing development. More recently this matter has been the subject of further investigation by Waterco on behalf of our client, who have prepared a Flood Risk Assessment, undertaken hydraulic modelling and a Flood Map Review. A copy of the last of these documents/assessments accompanies these representations and the previous assessments prepared by Waterco can be provided on request if required to inform the Inspector's assessment of this site.

Ultimately Waterco consider that the site's development in the manner shown on the indicative site layout enclosed is deliverable from a flood risk perspective, including in the context of the Framework and National Planning Practice Guidance and subject to mitigation measures such as localised land raising (which they consider would not have a material harmful effect on other properties nearby from a flood risk perspective, based on their assessments to date).

It is recognised that EA agreement would be required in this respect, but Waterco are confident this could be achieved at planning application stage. We also understand that updated EA data will also be made available in due course, which may result in positive changes to the EA Flood Map in respect of our client's site without the need for further site specific modelling and assessment.

In the meantime we assert that the extensive work undertaken by Waterco to date demonstrates that housing development of the land to the south and west of Hayfield Mills is deliverable from a flood risk perspective and that this land should be considered for allocation for housing development accordingly - particularly mindful of the sustainability credentials of this site.

The Residential Site Selection Process background paper confirms that the Council has rejected this site immediately due to the EA Flood Map, but in light of the findings of the previous detailed work

by Waterco we would encourage giving consideration to the allocation of this site, particularly as Waterco consider the site to be deliverable from a flood risk perspective and mindful of the site's status as previously developed land in a sustainable location.

In light of the main merits of our client's site and our separate comments about the need for and benefits of allocating additional land in the area for housing development, it is asserted that the Draft Local Plan should be amended to encourage the bringing forward of the previously developed land at Hayfield Mills that is surplus to requirements.

Taking account of the evidence submitted previously about the potential layout and capacity of the development of our client's site (including the enclosed indicative layout featuring 67 dwellings, which was submitted with planning application reference 32/2010/11224 and informed by the various technical reports/assessments that accompanied that application such as an Arboricultural Statement, Noise Assessment Report and Transport Statement - copies of which can be provided on request), it is considered that the land to the south and west of Hayfield Mills could make a material contribution to the housing delivery in the district, in an accessible location within a Local Service Centre.

With reference to the tests of soundness, it is submitted that Draft Policy SP8 is:

1. Not positively prepared - as it features a low level of housing growth/development in Glusburn/Crosshills (and more specifically excludes previously developed land in a sustainable location at Hayfield Mills that is surplus to requirements) that does not fulfil the potential that this area has to accommodate further development as part of a sustainable pattern of growth, including mindful of its existing size/population, range of amenities and consequent status as a Level 3 retail centre.
2. Not justified - as it is considered that the proposed reduction in the level of housing growth/development in Glusburn/Crosshills as compared to earlier drafts of the Local Plan and exclusion of the land at Hayfield Mills in question is not justified.
3. Not effective - as it stymies the potential for Glusburn/Crosshills to fulfil its role as a local service centre and make a more meaningful contribution to housing delivery in the district and a sustainable pattern of growth and enhance the prospects of delivering the number of homes required (both in Glusburn/Crosshills and district wide) in the plan period, including by way of encouraging/facilitating the bringing forward of the land at Hayfield Mills for development for housing purposes.
4. Not consistent with national policy - as it does not take the opportunity to enhance the potential to deliver sustainable development including a sustainable pattern of growth in the district, including by way of encouraging the beneficial redevelopment of the previously developed land at Hayfield Mills that is surplus to requirements and readily available for redevelopment.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

## Section 6: Proposed Modifications to the local plan

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is considered that Policy SP8 should be amended to include the allocation of land to the south and west of Hayfield Mills - which comprises previously developed land in a sustainable location that is surplus to requirements - for housing development of up to 67 dwellings, either in place of or in addition to the apparent greenfield site allocation at Ashfield Farm, Skipton Road, Crosshills.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

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**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)**

Yes, I wish to participate at the oral examination	✓
No, I do not wish to participate at the oral examination	

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

Given the nature of our representations in response to Draft Policies SP4, SP8, EC2 and Inset Map 2, we consider that it would be beneficial to have the opportunity to explain and expand on our comments in relation to this proposed development site - and for related discussions to take place on the range of issues involved and the Council's justification for excluding the site from its proposed housing allocations despite its clear sustainability credentials and the Council's own support for allocating the site earlier in the Local Plan preparation process - as part of the oral examination.

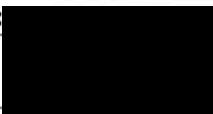
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### Section 8: Being Kept Informed

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Yes, I want to be informed	<input checked="" type="checkbox"/>
No, I don't want to be informed	<input type="checkbox"/>

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Signature	
Date	13 February 2018

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I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
<b>Please explain below, why you have made this request:</b>	

**Craven District Council** | 1 Belle Vue Square | Skipton | BD23 1FJ |

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Planning Policy Team | 01756 706472 | [localplan@cravenc.gov.uk](mailto:localplan@cravenc.gov.uk)



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## Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

### Publication Stage Representation Form

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Please note each representation must be signed and dated

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### Part A

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<b>First Name:</b>	
<b>Last Name:</b>	
<b>Job Title (where relevant):</b>	
<b>Organisation (where relevant):</b>	Glusburn Holdings Limited
<b>Address 1:</b>	
<b>Address 2:</b>	
<b>Address 3:</b>	

Address 4:	
Postcode:	
Telephone:	
Email:	

### Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████, Knights 1759
Address:	The Brampton Newcastle-under-Lyme Staffordshire ST5 0QW
Telephone number:	██████████
Email:	██

## Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

### Section 3

Name or Organisation:	Knights 1759 on behalf of Glusburn Holdings Limited
<b>To which part of the Local Plan does this representation relate?</b>	
Section and Paragraph	
Policy	EC2
Policies Map	

#### Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	✓	
2. Sound		✓
3. In Compliance with the Duty to Cooperate	✓	

Please refer to the Council's representation guidance notes at

<http://www.cravenc.gov.uk/newlocalplan>

#### Section 5: Details of Representation

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.**

Further to our representations in response to Draft Policies SP4 and SP8 - including with regard to our client's site at Hayfield Mills - it is noted that Inset Map 2 shows both the active employment site at Hayfield Mills and the land that is surplus to requirements (and thus not currently used for employment purposes), to the south and west of Hayfield Mills (i.e. Site SC014) as an Existing Employment Area to which Draft Policy EC2 applies.

As set out in our representations in relation to Draft Policies SP4 and SP8 we consider that the land to the south and west of Hayfield Mills should be allocated for housing development and excluded from any land to be safeguarded by Policy E2 accordingly. Indeed, the land in question is readily available for redevelopment for alternative uses, hence our promoting it for allocation for residential purposes (as confirmed elsewhere in our representations).

However even in the event that the Local Plan is not modified to allocate our client's land to the south and west of Hayfield Mills for housing development, we assert that this land should be excluded from the designated employment land to be safeguarded by Draft Policy EC2 as it is surplus to requirements and has been for some time (as detailed in the supporting documentation with planning application reference 32/2010/11224, submitted in December 2010 and so over 7 years ago).

Removing the land in question from the Existing Employment Area designation would enable the site to be allocated for residential development, or at least facilitate it coming forward as a windfall site on previously developed land should it not be allocated for residential development (subject to demonstrating that the proposed development is acceptable from a flood risk perspective - and in all other respects - at the time of a future planning application).

With reference to the tests of soundness, it is submitted that Draft Policy E2 combined with Inset Map 2 is:

1. Not positively prepared - as its inclusion of land to the south and west of Hayfield Mills that is surplus to requirements within the 'Existing Employment Area' is inappropriate and would present an unnecessary policy 'hurdle' to bringing the land in question forward for housing development as part of the sustainable growth of Glusburn/Crosshills.

2. Not justified - as it is considered that inclusion of the land to the south and west of Hayfield Mills that is surplus to requirements within the 'Existing Employment Area' is not justified.
3. Not effective - as the inclusion of the land in question within the 'Existing Employment Area' stymies the potential to bring this land forward for housing development as part of the sustainable growth of Glusburn/Crosshills.
4. Not consistent with national policy - as it does not take the opportunity to enhance the potential to deliver sustainable development including a sustainable pattern of growth in the district, including by way of encouraging the beneficial redevelopment of the previously developed land at Hayfield Mills that is surplus to requirements and readily available for redevelopment.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

### **Section 6: Proposed Modifications to the local plan**

**Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

It is considered that Inset Map 2 should be amended to exclude our client's land to the south and west of Hayfield Mills from the designated employment land to be safeguarded by Draft Policy EC2.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the representations period of the Publication Craven Local Plan has closed, further submissions will only be at the request of the Inspector, based on the matters and issues debated at the examination.

### Section 7: Participation at the Examination

<b>If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)</b>	
Yes, I wish to participate at the oral examination	✓
No, I do not wish to participate at the oral examination	
<b>If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:</b>	
<p>Given the nature of our representations in response to Draft Policies SP4, SP8, EC2 and Inset Map 2, we consider that it would be beneficial to have the opportunity to explain and expand on our comments in relation to this proposed development site - and for related discussions to take place on the range of issues involved and the Council's justification for excluding the site from its proposed housing allocations despite its clear sustainability credentials and the Council's own support for allocating the site earlier in the Local Plan preparation process - as part of the oral examination.</p>	


**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### Section 8: Being Kept Informed

<b>Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)</b>	
Yes, I want to be informed	✓
No, I don't want to be informed	

**Please note** that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

### Section 9: Signature & Date of Representation

<b>Please sign and date below:</b>	
Signature	
Date	13 February 2018

After the end of the representation period the Council will submit all individual representations received to the Secretary of State, together with a summary of the main issues raised during the representations period.

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FOIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FOIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

**If you wish your personal details to be treated in confidence and not published please tick the box below:**

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
---	--------------------------

**Please explain below, why you have made this request:**

**Craven District Council** | 1 Belle Vue Square | Skipton | BD23 1FJ |  
[www.cravenc.gov.uk](http://www.cravenc.gov.uk)

Planning Policy Team | 01756 706472 | [localplan@cravenc.gov.uk](mailto:localplan@cravenc.gov.uk)



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**If you would like to have this information in a way that's better for you, please telephone 01756 700600.**

# Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

## Publication Stage Representation Form

Publication draft Craven Local Plan public representations period runs from Tuesday 2<sup>nd</sup> January 2018 – Tuesday 13<sup>th</sup> February 2018.

Regulation 19-Town and Country Planning (Local Planning) (England) Regulations 2012

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**Representations must be received no later than 5pm on Tuesday 13<sup>th</sup> February 2018**

Please return completed forms to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: [localplans@cravencd.gov.uk](mailto:localplans@cravencd.gov.uk)

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

---

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

---

### Part A

#### Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	Glusburn Holdings Limited
Address 1:	
Address 2:	
Address 3:	

<b>Address 4:</b>	
<b>Postcode:</b>	
<b>Telephone:</b>	
<b>Email:</b>	

### Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

<b>Agent name:</b>	██████████ Knights 1759
<b>Address:</b>	The Brampton Newcastle-under-Lyme Staffordshire ST5 0QW
<b>Telephone number:</b>	██████████
<b>Email:</b>	████████████████████

## Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

### Section 3

<b>Name or Organisation:</b>	Knights 1759 on behalf of Glusburn Holdings Limited
<b>To which part of the Local Plan does this representation relate?</b>	
<b>Section and Paragraph</b>	
<b>Policy</b>	(SP8, EC2)
<b>Policies Map</b>	<b>Inset Map 2</b>



#### Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	✓	
2. Sound		✓
3. In Compliance with the Duty to Cooperate	✓	

Please refer to the Council's representation guidance notes at

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Further to our representations in response to Draft Policies SP4, SP8 and EC2 - including with regard to our client's land to the south and west of Hayfield Mills, Glusburn - is it considered that Inset Map 2 is unsound for the reasons stated in those aforementioned representations i.e. related to the omission of the land as a housing allocation and its inclusion within the 'Existing Employment Area' designation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

#### Section 6: Proposed Modifications to the local plan

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is considered that Inset Map 2 should be amended as follows:

- To reduce the extent of the Existing Employment Area, to remove the land to the south and west of Hayfield Mills that is surplus to requirements and has been for some time (i.e. all of the land within the potential development site as shown on the indicative site layout that accompanies our representations on Draft Policy SP8);
- To allocate the land to the west and south of Hayfield Mills that is surplus to requirements (again as shown on the indicative site layout that accompanies these representations) for residential development;
- Remove Site Ref. SC037(a) as a Draft Housing Allocations if it does not comprise genuine *previously developed land* (as defined in the Framework).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

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**If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)**

Yes, I wish to participate at the oral examination



No, I do not wish to participate at the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

Given the nature of our representations in response to Draft Policies SP4, SP8, EC2 and Inset Map 2, we consider that it would be beneficial to have the opportunity to explain and expand on our comments in relation to this proposed development site - and for related discussions to take place on the range of issues involved and the Council's justification for excluding the site from its proposed housing allocations despite its clear sustainability credentials and the Council's own support for allocating the site earlier in the Local Plan preparation process - as part of the oral examination.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### Section 8: Being Kept Informed

**Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)**

Yes, I want to be informed



No, I don't want to be informed

**Please note** that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

**Section 9: Signature & Date of Representation**

<b>Please sign and date below:</b>	
Signature	██████████
Date	<b>13 February 2018</b>

After the end of the representation period the Council will submit all individual representations received to the Secretary of State, together with a summary of the main issues raised during the representations period.

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FOIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FOIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

<b>If you wish your personal details to be treated in confidence and not published please tick the box below:</b>	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
<b>Please explain below, why you have made this request:</b>	

**Craven District Council** | 1 Belle Vue Square | Skipton | BD23 1FJ |  
[www.cravenc.gov.uk](http://www.cravenc.gov.uk)

Planning Policy Team | 01756 706472 | [localplan@cravenc.gov.uk](mailto:localplan@cravenc.gov.uk)



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telephone 01756 700600.**

# Hayfield Mills, Glusburn

## Flood Map Review

May 2016



## DOCUMENT VERIFICATION RECORD

<b>CLIENT:</b>	Glusburn Holdings Ltd
<b>SCHEME:</b>	Hayfield Mills, Glusburn – Flood Map Review
<b>INSTRUCTION:</b>	The instruction to carry out this Flood Map Review was received from [REDACTED] of Knights Professional Services Ltd.

## DOCUMENT REVIEW &amp; APPROVAL

<b>AUTHOR:</b>	[REDACTED] BSc (Hons)
<b>APPROVER:</b>	[REDACTED] BSc (Hons)

## ISSUE HISTORY

ISSUE DATE	COMMENTS
31/05/2016	First issue

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- Appendix C – EA Correspondence

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**Figure 3** – Maximum Water Level Difference – 1% Annual Probability + Climate Change (site raised). 5

## Introduction

Waterco Consultants have been instructed to prepare a Flood Map Review in respect of a proposed development site at Hayfield Mills, Glusburn, BD20 8QP.

The purpose of this report is to support the sites allocation for residential development within the Craven District Council Local Plan. The site is currently shown wholly within Flood Zone 2 on the Environment Agency (EA) 'Flood Map for Planning' included in Appendix A.

The Flood Zone classifications are defined in Table 1 below:

**Table 1** – EA Flood Zone Classifications

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding

Craven District Council have confirmed that, for the site to be considered within the Local Plan they require that there is greater than 0.1 hectares (ha) of developable land within Flood Zone 1 within the site.

This report demonstrates that there are limitations with the current EA 'Flood Map for Planning' and that approximately 1.9ha (43% of the total site area) of the site falls outside of the 0.1% annual probability flood extent and therefore within Flood Zone 1.



## Flood Map Review

### Existing EA Flood Map

The site is currently shown wholly within Flood Zone 2 on the EA 'Flood Map for Planning'.

Current EA mapping is based on the estimated flood levels extracted from the Glusburn Beck Flood Risk Mapping Study completed by Atkins in July 2007. This study included construction of a one-dimensional (1D) hydraulic model of Glusburn Beck based on surveyed river cross-sections. 1D modelling does not take account of the hydraulics of the wider floodplain. It is an assessment of in-channel water levels only.

The Flood Zone 2 classification is derived from interpolating in-channel water levels linearly across the surrounding land. It does not take account of specific topography and flow routes within the floodplain. The EA Flood Map does not give an accurate representation of the flood extent on a site specific scale.

### Detailed Flood Mapping

To provide a more accurate assessment of the fluvial flood risk across the site and to determine an accurate flood extent, the existing EA 1D-only model was linked to a 2D digital terrain model for improved representation of the potential floodplain i.e. an integrated 1D/2D Hydraulic model.

A 1D/2D hydrodynamic model comprises of a 1D river network model (based on surveyed river cross-sections) coupled together with a 2D Digital Terrain Model (DTM) of the potential floodplain built from site-specific topographical data and high resolution LiDAR data. Adopting such an approach will ensure that Glusburn Beck and potential overland flow routes are adequately represented within and around the development site.

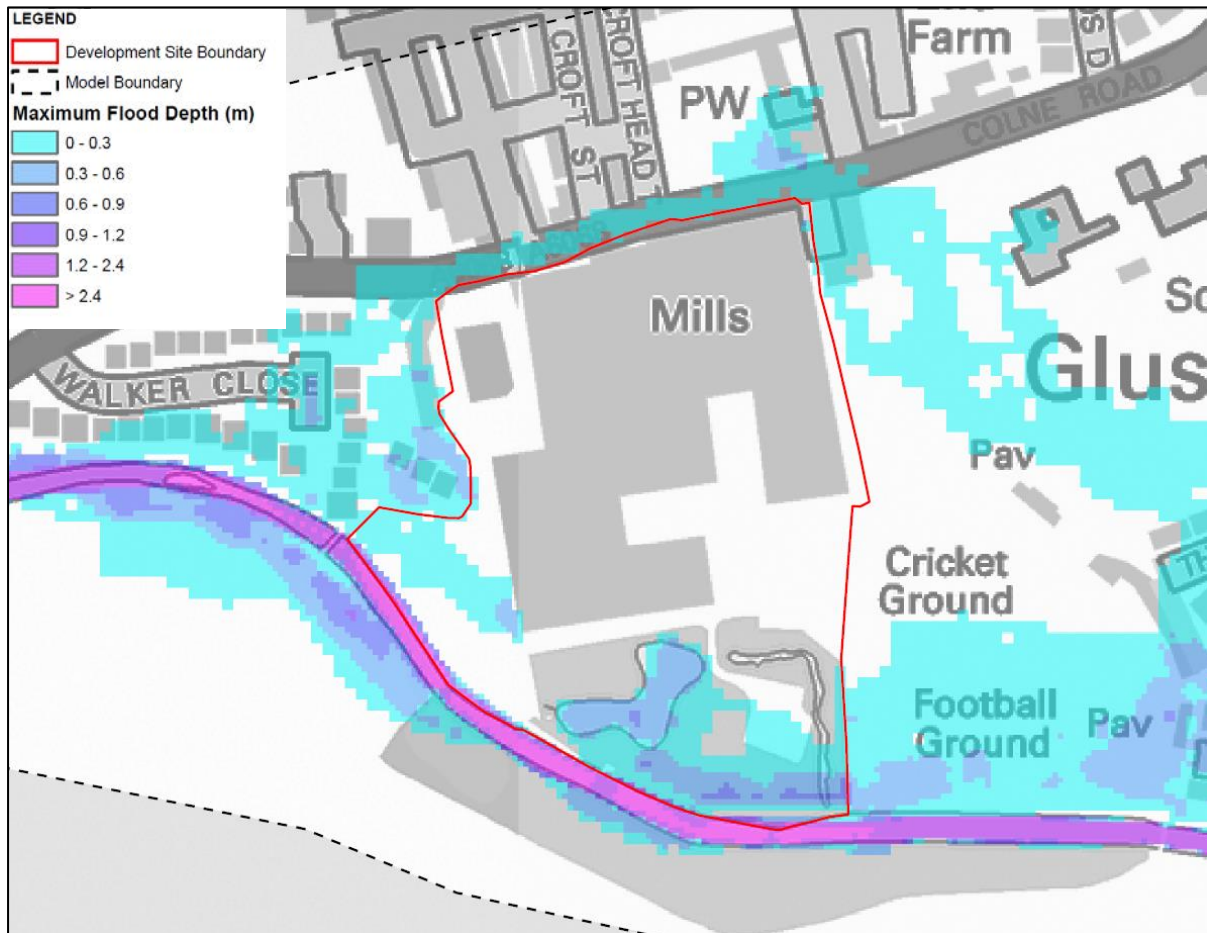
No changes were made to the flow data used in the Glusburn Beck Flood Risk Mapping Study (2007). Full details of the hydraulic modelling are provided in the Waterco Consultants Hydraulic Modelling Report (document reference w3125-140711-HMR). The 1D/2D hydrodynamic model was completed in July 2014.

### Model Results

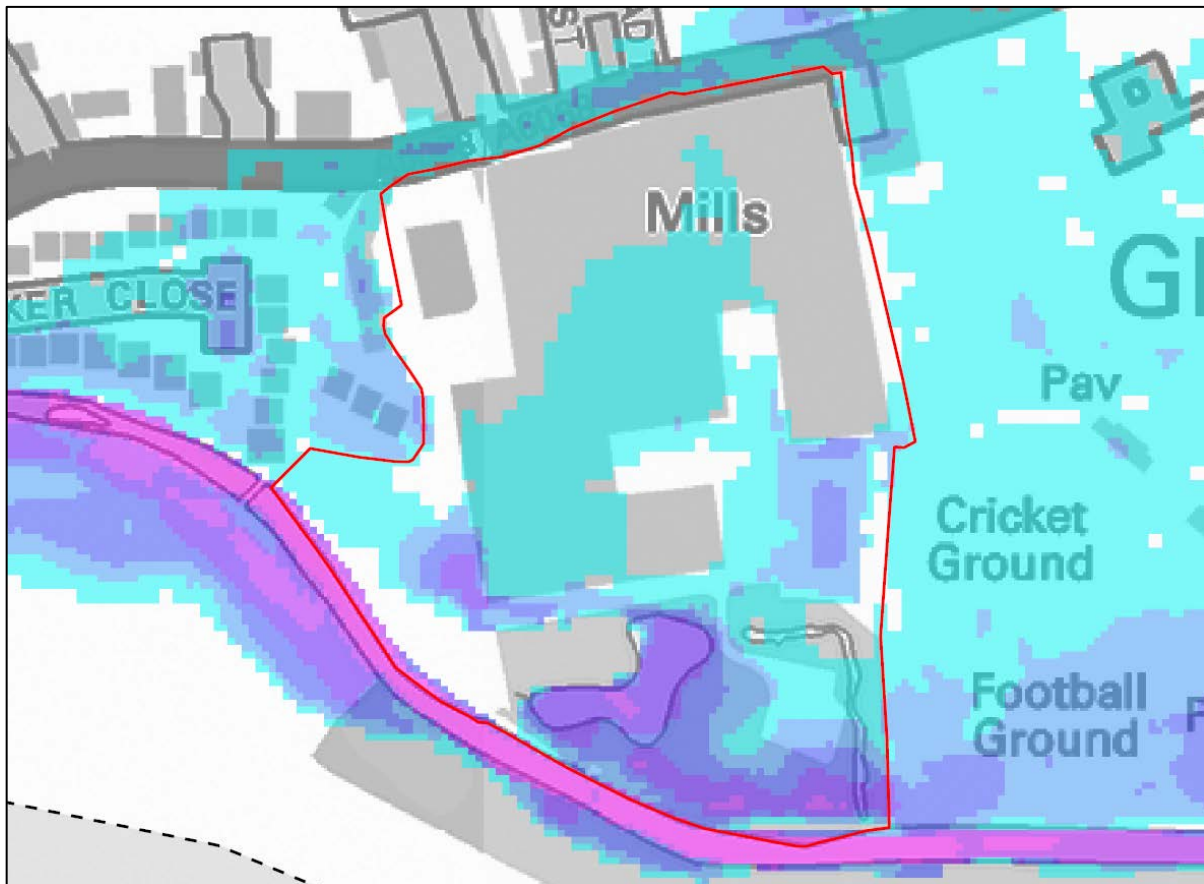
Maximum flood depth, velocity and flood hazard mapping is included in Appendix B with map extracts provided overleaf.

The integrated 1D/2D Hydraulic model shows that approximately 15% of the site (adjacent to Glusburn Beck) is shown at risk of flooding during the 1 in 100 (1%) annual probability event. Therefore 15% of the site is considered to be Flood Zone 3. The flood extent for the 1% annual probability event is given in Figure 1 below.

**Figure 1** – Maximum Flood Depth and Flood Extent – 1% Annual Probability



During the 0.1% annual probability event approximately 57% of the site is shown at risk of flooding. Flood depths are generally less than 300mm with the exception of localised topographical low points i.e. the south-eastern corner of the site. Therefore 57% of the site is considered to be Flood Zone 2. 43% of the site is shown outside of the 0.1% annual probability flood extent and is therefore considered to be Flood Zone 1. The flood extent for the 0.1% annual probability event is shown in Figure 2 overleaf.

**Figure 2** – Maximum Flood Depth and Flood Extent – 0.1% Annual Probability

## Consultation

The results of the integrated 1D/2D hydrodynamic model were submitted to the EA to seek confirmation as to whether the EA Flood Map could be updated. The EA response is included in Appendix C. The EA state that *'at present there is insufficient information for us to be able to definitely accept or refuse your request to amend our Flood Map'*.

The EA cannot accept or refuse the request to amend the Flood Map given the age of the hydraulic modelling works. The EA have requested that the model is updated using latest modelling software and new channel cross section survey, LiDAR and flow data.

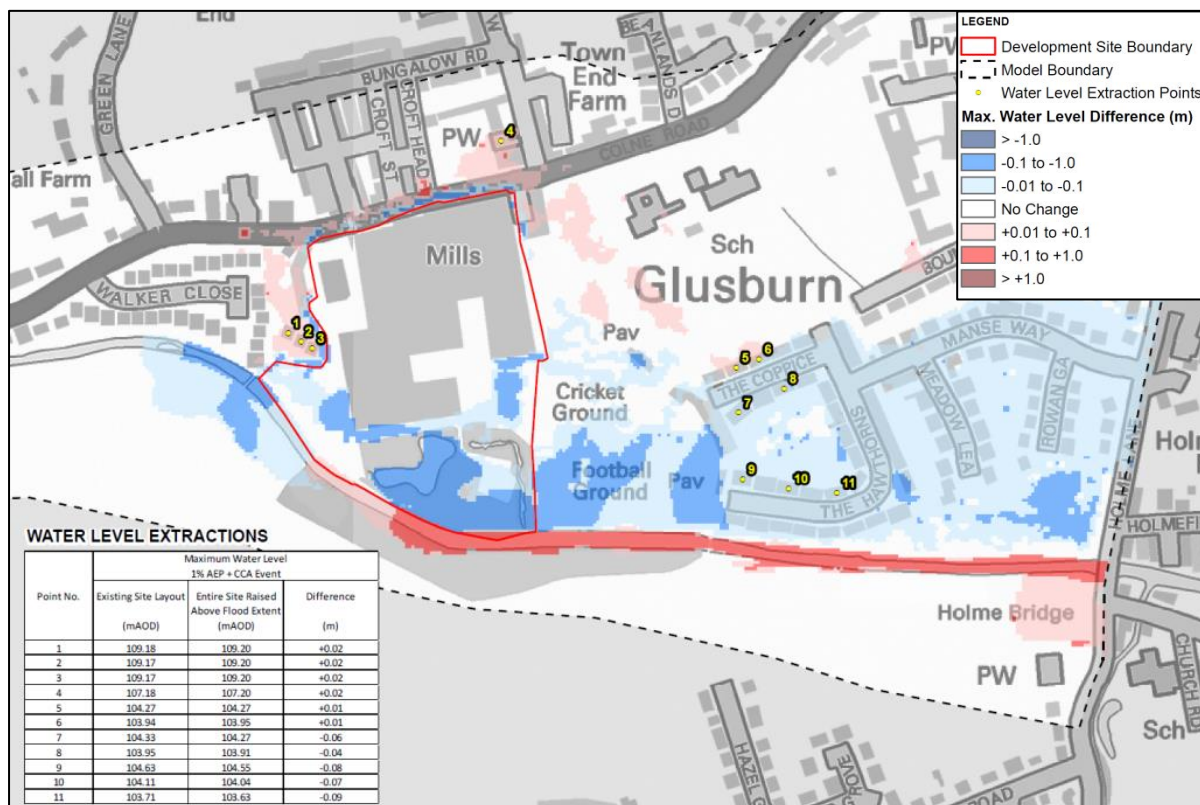
The updated modelling would likely not significantly change the flood extent derived from the current integrated 1D/2D hydrodynamic model. Updated modelling will also include for the latest EA Climate Change guidance (February 2016).

### Flood Mitigation Options

Approximately 57% of the site is shown within Flood Zone 2 (at flood risk during a 1 in 1000 annual probability event). The majority of flood depths during this event are less than 300mm. The flood risk to property and site users during this event could therefore be mitigated by raising finished floor levels.

An alternative option is to raise site levels above estimated flood levels, thereby placing a greater extent of the site within Flood Zone 1. The impact of raising site levels above estimated flood levels has been assessed with a water level difference map provided in Appendix B and an extract given in Figure 3 below. The maximum increase in flood depths to nearby properties as a result of raising the site is negligible (20mm). Raising site levels reduces flood depths to properties downstream.

**Figure 3 – Maximum Water Level Difference – 1% Annual Probability + Climate Change (site raised)**



Site levels could be designed to reduce or remove impact on flood risk elsewhere i.e. through provision of flood compensatory storage.

## Policy Context

Residential development is classified as 'more vulnerable' development in accordance with Table 2 of the National Planning Policy Guidance (NPPG): Flood Risk and Coastal Change. Table 3 of the NPPG states that 'more vulnerable' development is considered 'appropriate' within Flood Zone 2 and that the flood risk Exception Test, which requires production of a site specific Flood Risk Assessment, is not required.

## Conclusions

The existing 1D Environment Agency flood model, used to derive the Flood Zone classification, was linked to a 2D digital terrain model for improved representation of the potential floodplain i.e. an integrated 1D/2D Hydraulic model.

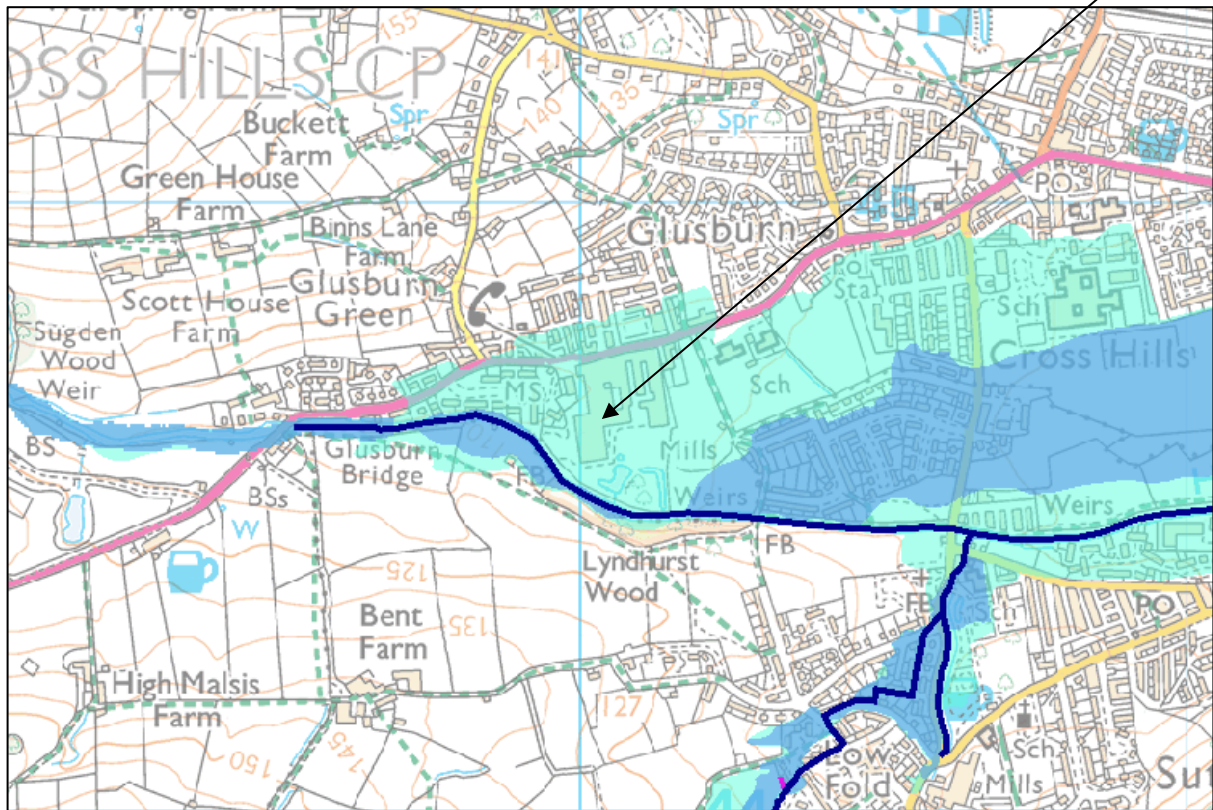
The 1D/2D model shows that 1.9 hectares of the site (43% of the total site area) is located outside of the 0.1% annual probability flood extent and should therefore be considered as Flood Zone 1.

The EA require an update to the model (update to the topographical data and flows) prior to accepting the Flood Zone 1 classification.

Mitigation measures such as localised land raising could designate additional land on site as Flood Zone 1.

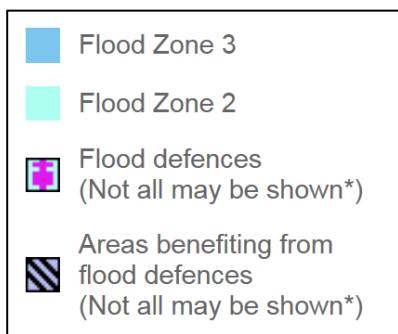
Appendix A – EA Flood Map

Site location



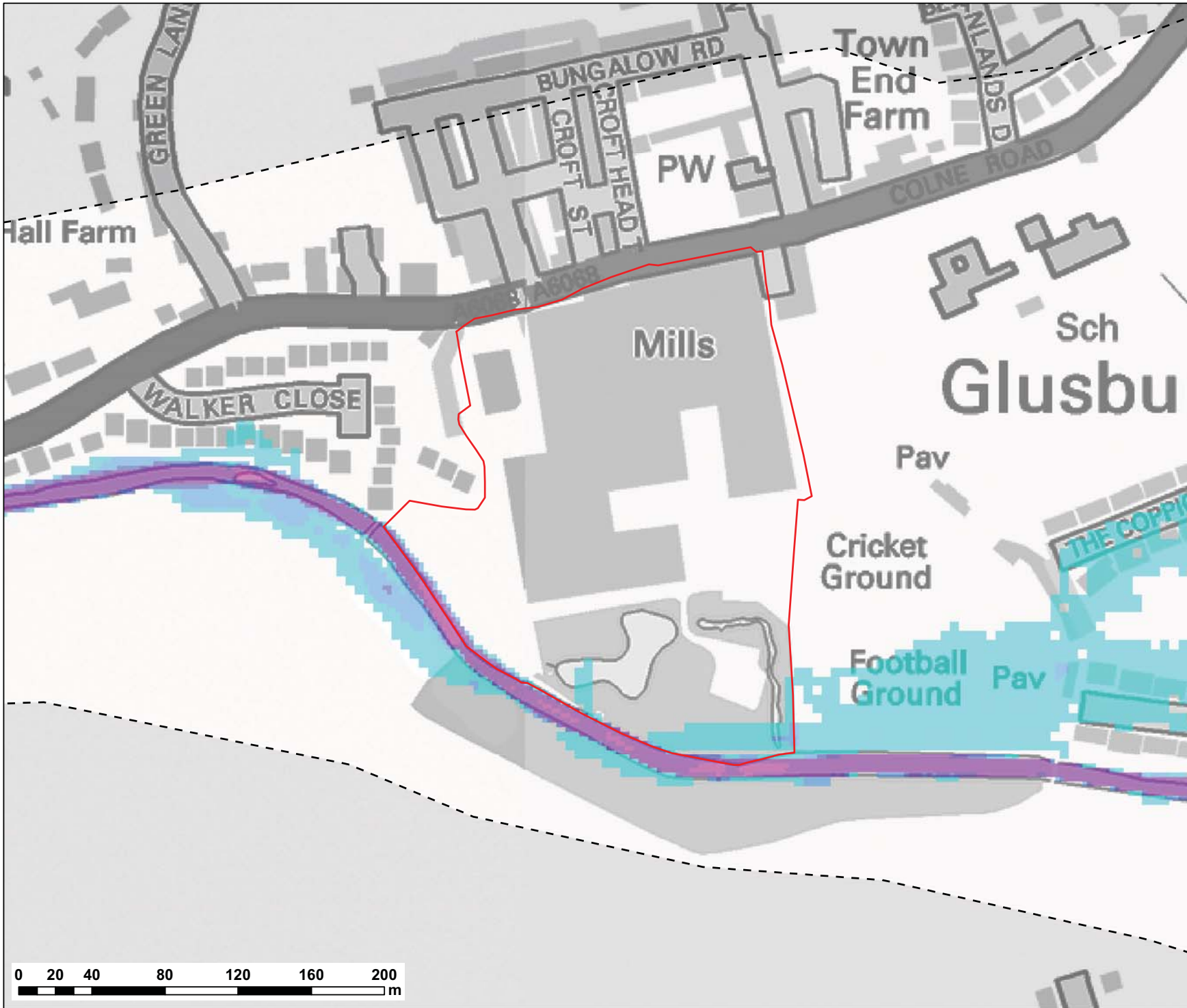
Environment Agency Flood Map for Planning

(May 2016)



## Appendix B – Waterco Modelled Flood Mapping





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Flood Depth (m)**

- 0 - 0.3
- 0.3 - 0.6
- 0.6 - 0.9
- 0.9 - 1.2
- 1.2 - 2.4
- > 2.4



CLIENT:  
**GLUSBURN HOLDINGS LTD**

**waterco**  
consultants

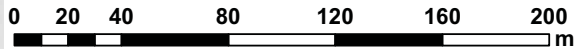
Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ  
www.waterco.co.uk

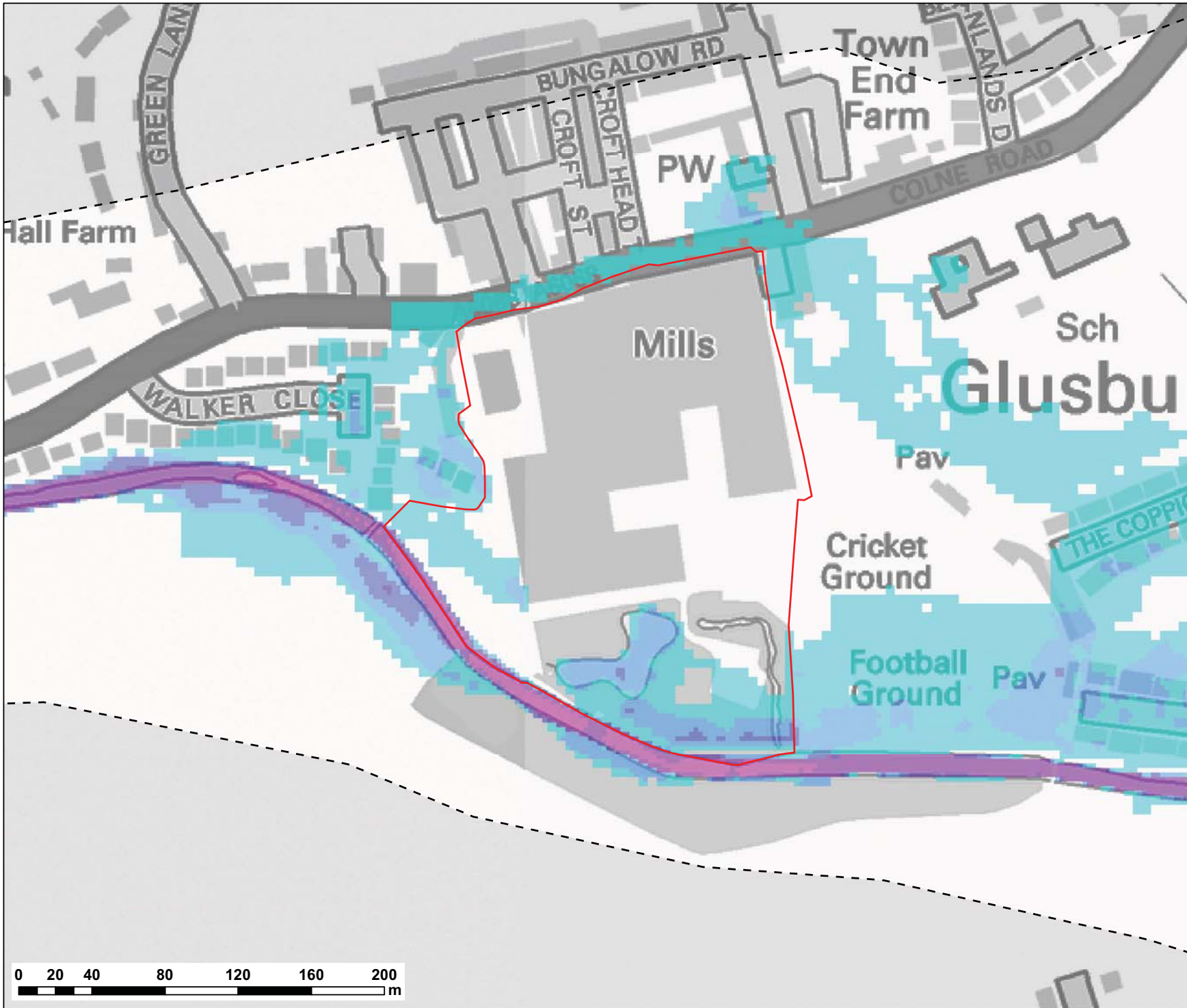
SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD DEPTH  
4% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

<small>DRAWN:</small> DH	<small>CHECKED:</small> BY	<small>APPROVED:</small> DK	<small>PLOT SCALE @ A3:</small> 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
<small>DATE:</small> 09/07/2014	<small>PLOT NAME:</small> w3125-ID01-D		<small>REV:</small> -





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Flood Depth (m)**

- 0 - 0.3
- 0.3 - 0.6
- 0.6 - 0.9
- 0.9 - 1.2
- 1.2 - 2.4
- > 2.4



CLIENT:  
**GLUSBURN HOLDINGS LTD**

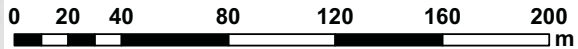


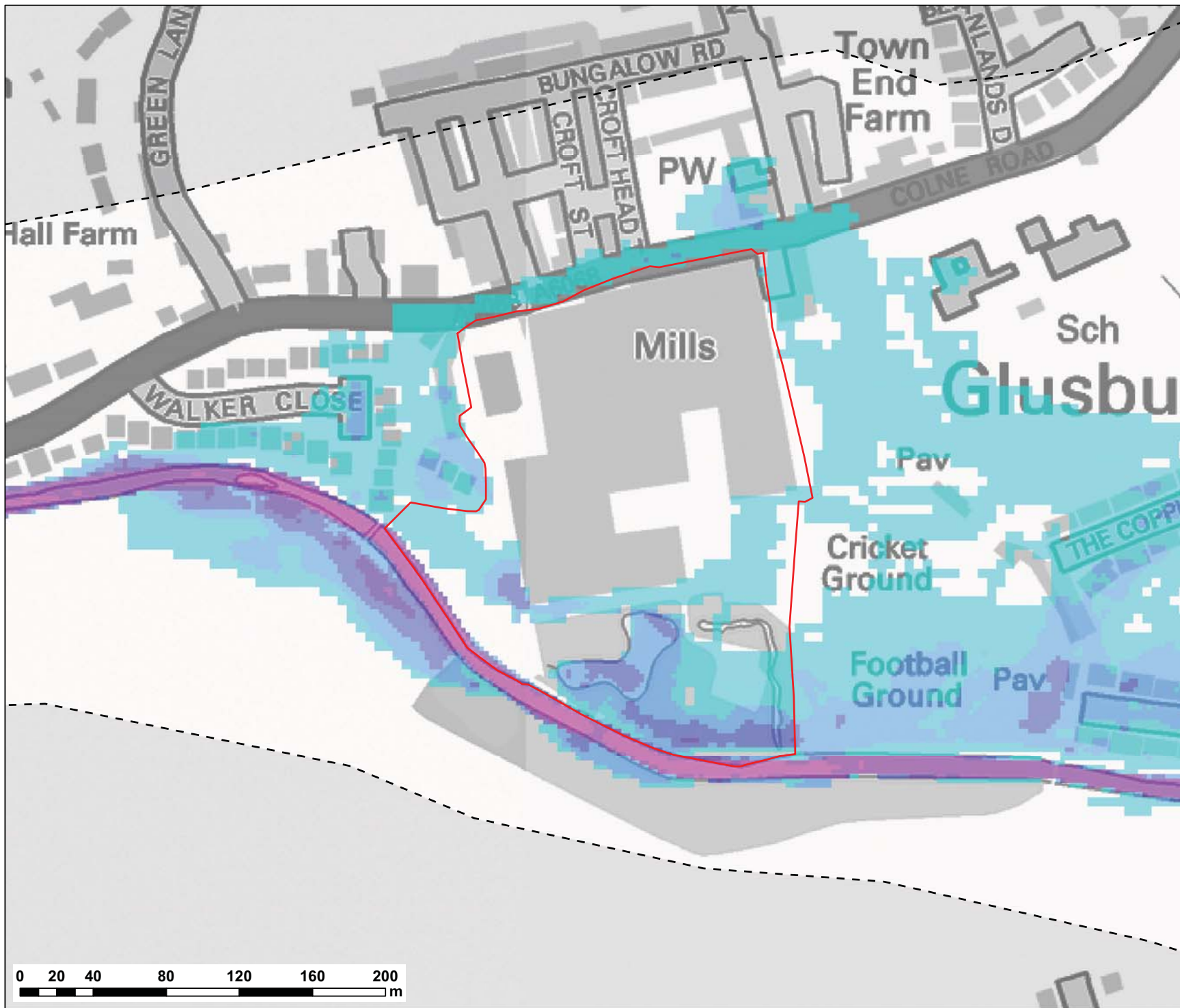
SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD DEPTH  
1% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 (UNLESS STATED OTHERWISE)
DATE: 09/07/2014	PLOT NAME: w3125-ID02-D		REV: -





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Flood Depth (m)**

- 0 - 0.3
- 0.3 - 0.6
- 0.6 - 0.9
- 0.9 - 1.2
- 1.2 - 2.4
- > 2.4

CLIENT:  
**GLUSBURN HOLDINGS LTD**

**waterco**  
consultants

Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ  
www.waterco.co.uk

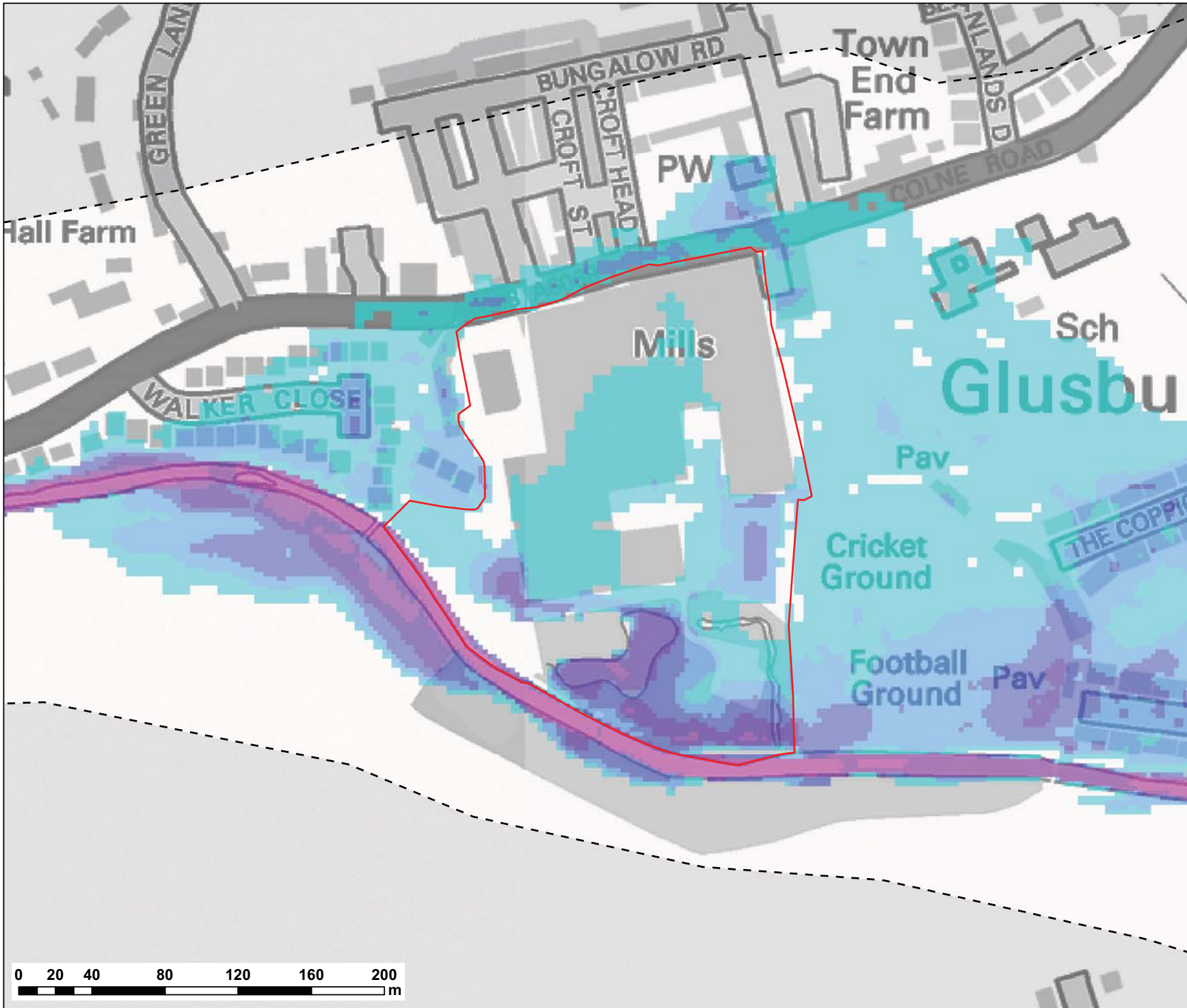
SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD DEPTH  
1% AEP + CCA FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 (UNLESS STATED OTHERWISE)
DATE: 09/07/2014		PLOT NAME: w3125-ID03-D	REV: -






**LEGEND**


- Development Site Boundary
- Model Boundary

**Maximum Flood Depth (m)**

- 0 - 0.3
- 0.3 - 0.6
- 0.6 - 0.9
- 0.9 - 1.2
- 1.2 - 2.4
- > 2.4



CLIENT:  
**GLUSBURN HOLDINGS LTD**



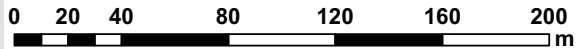
Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ [www.waterco.co.uk](http://www.waterco.co.uk)

SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD DEPTH  
0.1% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
DATE: 09/07/2014	PLOT NAME: w3125-ID04-D		REV: -





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Velocity (m/s)**

- 0.0 - 0.5
- 0.5 - 1.0
- 1.0 - 1.5
- 1.5 - 2.0
- > 2.0

**CLIENT:**  
**GLUSBURN HOLDINGS LTD**

**waterco**  
consultants

Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ  
www.waterco.co.uk

**SCHEME:**  
**HAYFIELD MILLS  
GLUSBURN**

**PLOT TITLE:**  
**MAXIMUM VELOCITY  
4% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

**PLOT STATUS:**  
**ISSUE**

<small>DRAWN:</small> DH	<small>CHECKED:</small> BY	<small>APPROVED:</small> DK	<small>PLOT SCALE @ A3:</small> 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
<small>DATE:</small> 09/07/2014		<small>PLOT NAME:</small> w3125-ID01-V	<small>REV:</small> -





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Velocity (m/s)**

- 0.0 - 0.5
- 0.5 - 1.0
- 1.0 - 1.5
- 1.5 - 2.0
- > 2.0



CLIENT:  
**GLUSBURN HOLDINGS LTD**

**waterco**  
consultants

Waterco Ltd  
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www.waterco.co.uk

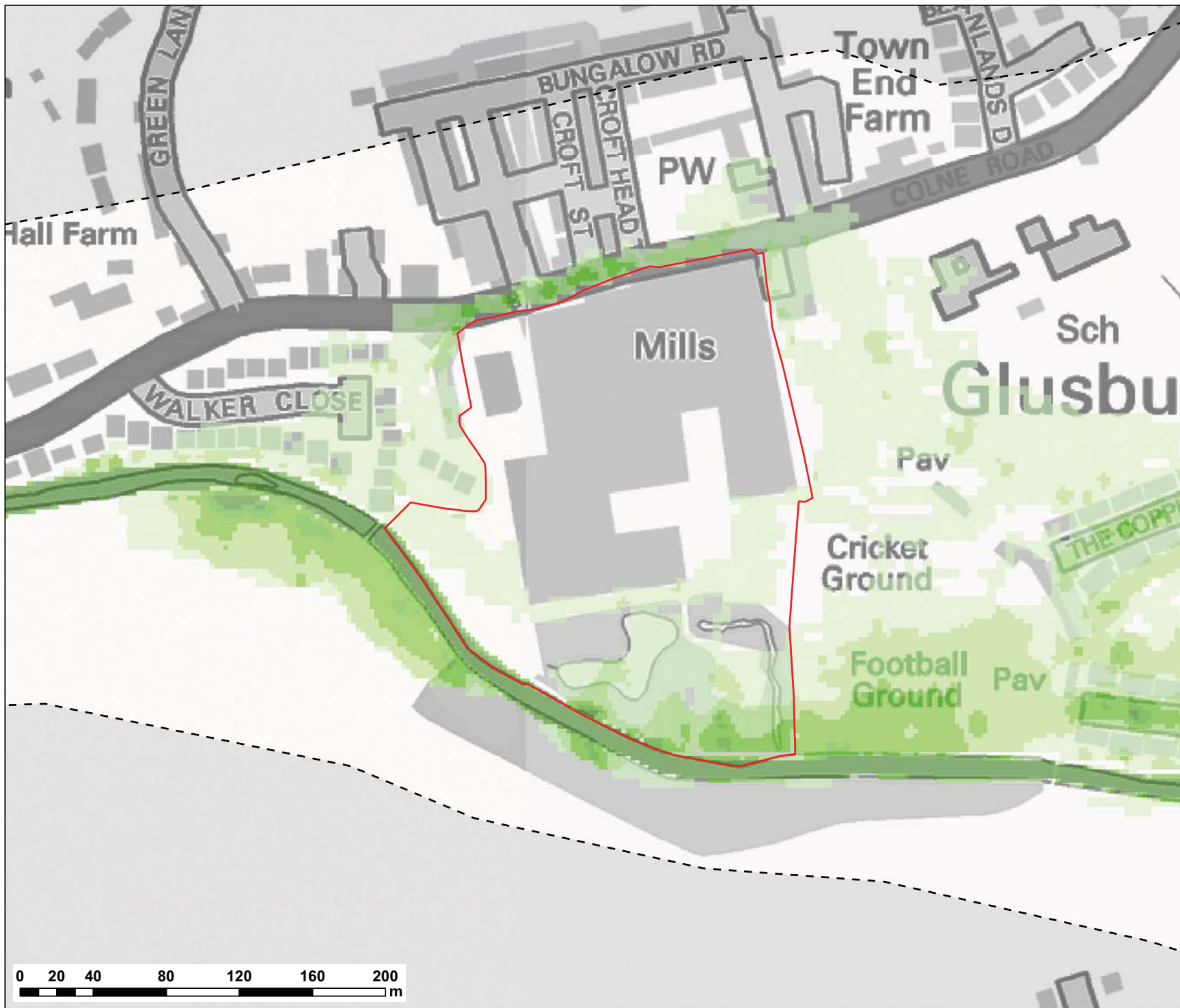
SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM VELOCITY  
1% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

<small>DRAWN:</small> DH	<small>CHECKED:</small> BY	<small>APPROVED:</small> DK	<small>PLOT SCALE @ A3:</small> 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
<small>DATE:</small> 09/07/2014		<small>PLOT NAME:</small> w3125-ID02-V	<small>REV:</small> -





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Velocity (m/s)**

- 0.0 - 0.5
- 0.5 - 1.0
- 1.0 - 1.5
- 1.5 - 2.0
- > 2.0

**CLIENT:**  
**GLUSBURN HOLDINGS LTD**

**waterco**  
 consultants

Waterco Ltd  
 Eden Court, Ruthin, LL15 1NJ  
 www.waterco.co.uk

**SCHEME:**  
**HAYFIELD MILLS  
 GLUSBURN**

**PLOT TITLE:**  
**MAXIMUM VELOCITY  
 1% AEP + CCA FLUVIAL EVENT  
 EXISTING SITE LAYOUT**

**PLOT STATUS:**  
**ISSUE**

<b>DRAWN:</b> DH	<b>CHECKED:</b> BY	<b>APPROVED:</b> DK	<b>PLOT SCALE @ A3:</b> 1:2,000 (UNLESS STATED OTHERWISE)
<b>DATE:</b> 09/07/2014		<b>PLOT NAME:</b> w3125-ID03-V	<b>REV:</b> -





**LEGEND**

- Development Site Boundary
- Model Boundary

**Maximum Velocity (m/s)**

- 0.0 - 0.5
- 0.5 - 1.0
- 1.0 - 1.5
- 1.5 - 2.0
- > 2.0



CLIENT:  
**GLUSBURN HOLDINGS LTD**



Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ [www.waterco.co.uk](http://www.waterco.co.uk)

SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM VELOCITY  
0.1% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
DATE: 09/07/2014		PLOT NAME: w3125-ID04-V	
		REV: -	







**LEGEND**

- Development Site Boundary
- Model Boundary

**Max Flood Hazard (FD2320)**

- < 0.75 (Caution)
- 0.75 - 1.25 (Danger for Some)
- 1.25 - 2 (Danger for Most)
- > 2.0 (Danger for All)



CLIENT:  
**GLUSBURN HOLDINGS LTD**

**waterco**  
consultants

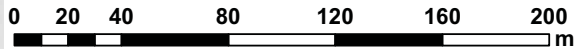
Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ  
www.waterco.co.uk

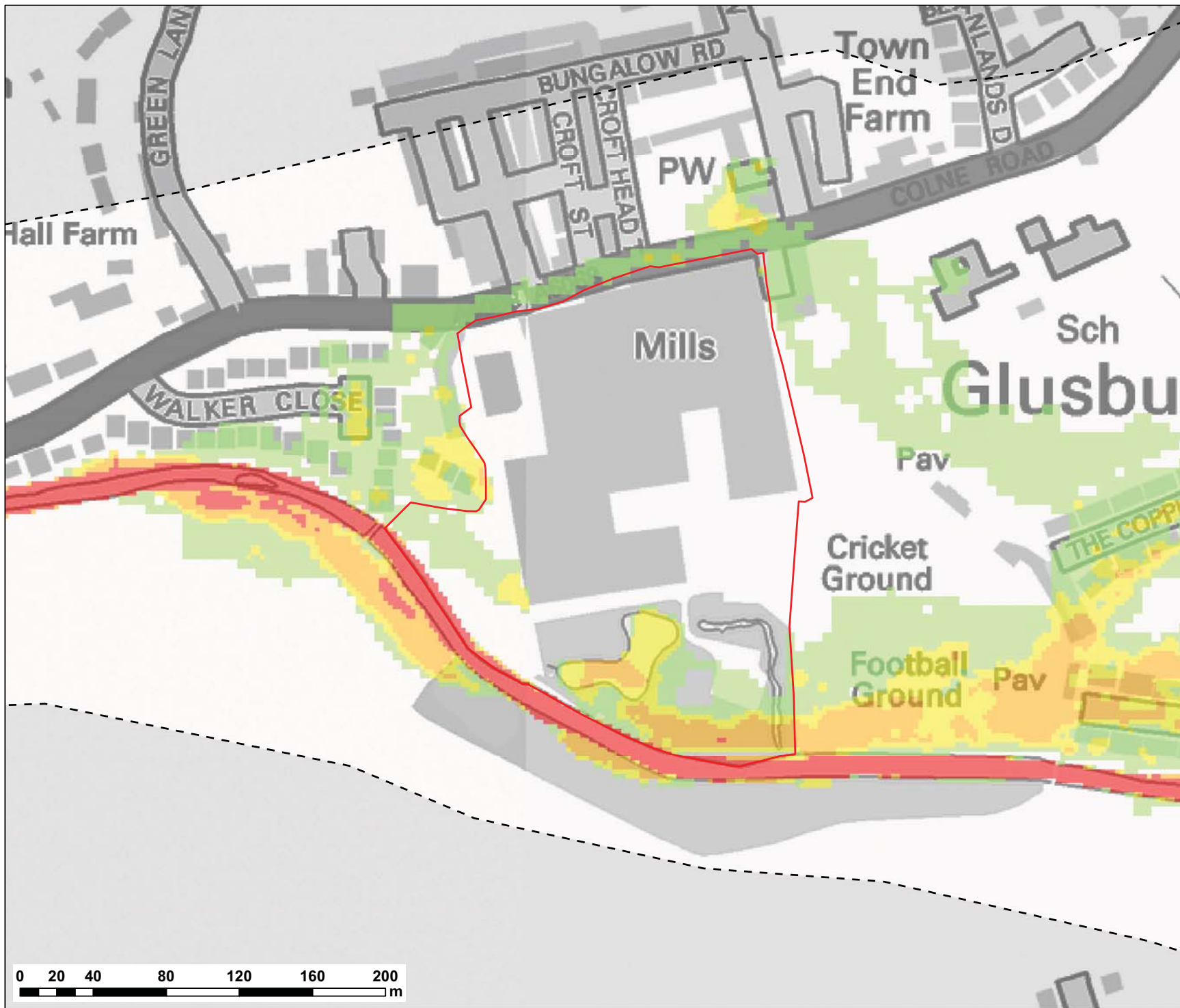
SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD HAZARD  
4% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

<small>DRAWN:</small> DH	<small>CHECKED:</small> BY	<small>APPROVED:</small> DK	<small>PLOT SCALE @ A3:</small> 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
<small>DATE:</small> 09/07/2014	<small>PLOT NAME:</small> w3125-ID01-H		<small>REV:</small> -






**LEGEND**


- Development Site Boundary
- Model Boundary

**Max Flood Hazard (FD2320)**

- < 0.75 (Caution)
- 0.75 - 1.25 (Danger for Some)
- 1.25 - 2 (Danger for Most)
- > 2.0 (Danger for All)



CLIENT:  
**GLUSBURN HOLDINGS LTD**



Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ [www.waterco.co.uk](http://www.waterco.co.uk)

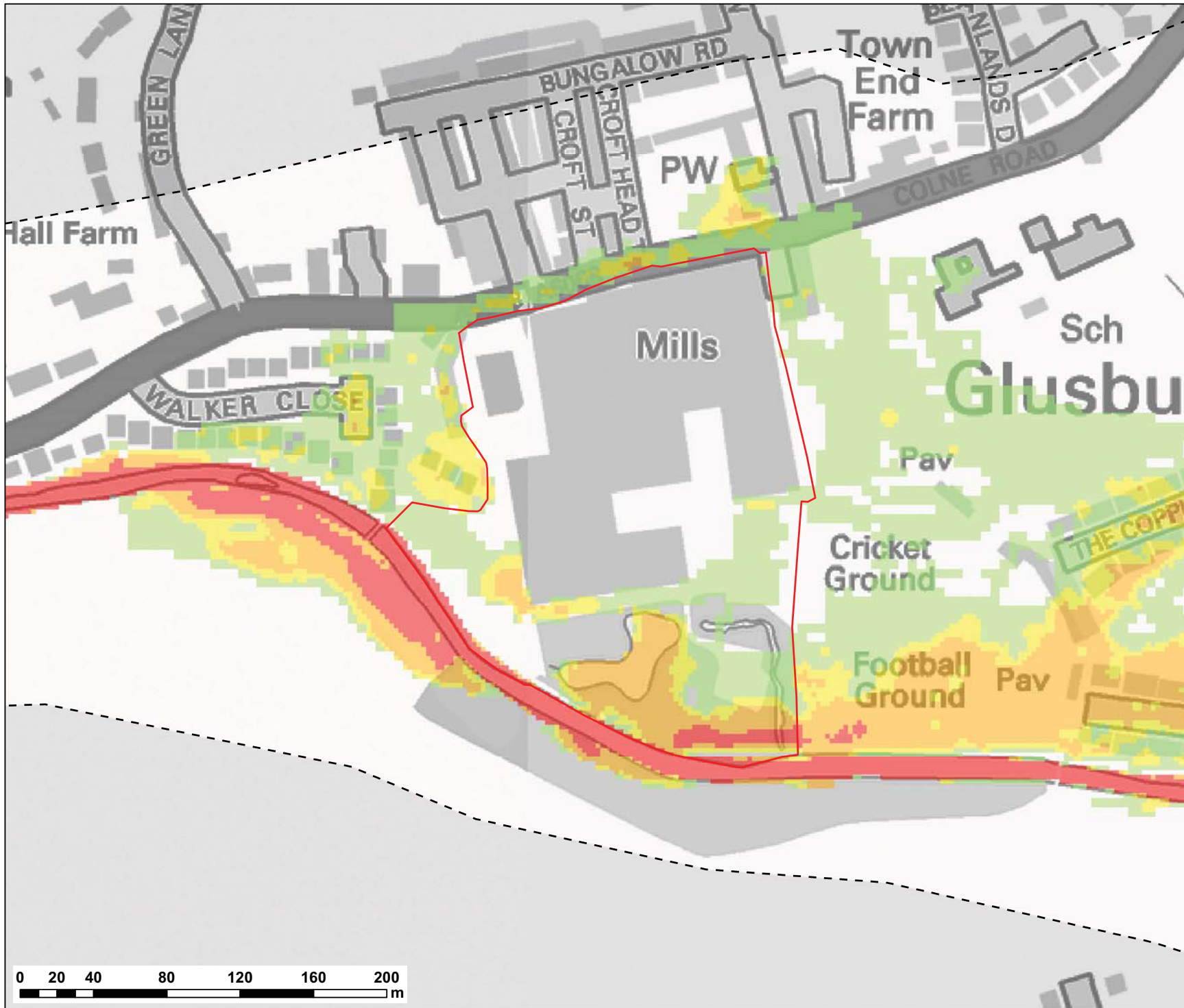
SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD HAZARD  
1% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
DATE: 09/07/2014		PLOT NAME: w3125-ID02-H	
REV:			-






**LEGEND**


- Development Site Boundary
- Model Boundary

**Max Flood Hazard (FD2320)**

- < 0.75 (Caution)
- 0.75 - 1.25 (Danger for Some)
- 1.25 - 2 (Danger for Most)
- > 2.0 (Danger for All)



CLIENT:  
**GLUSBURN HOLDINGS LTD**



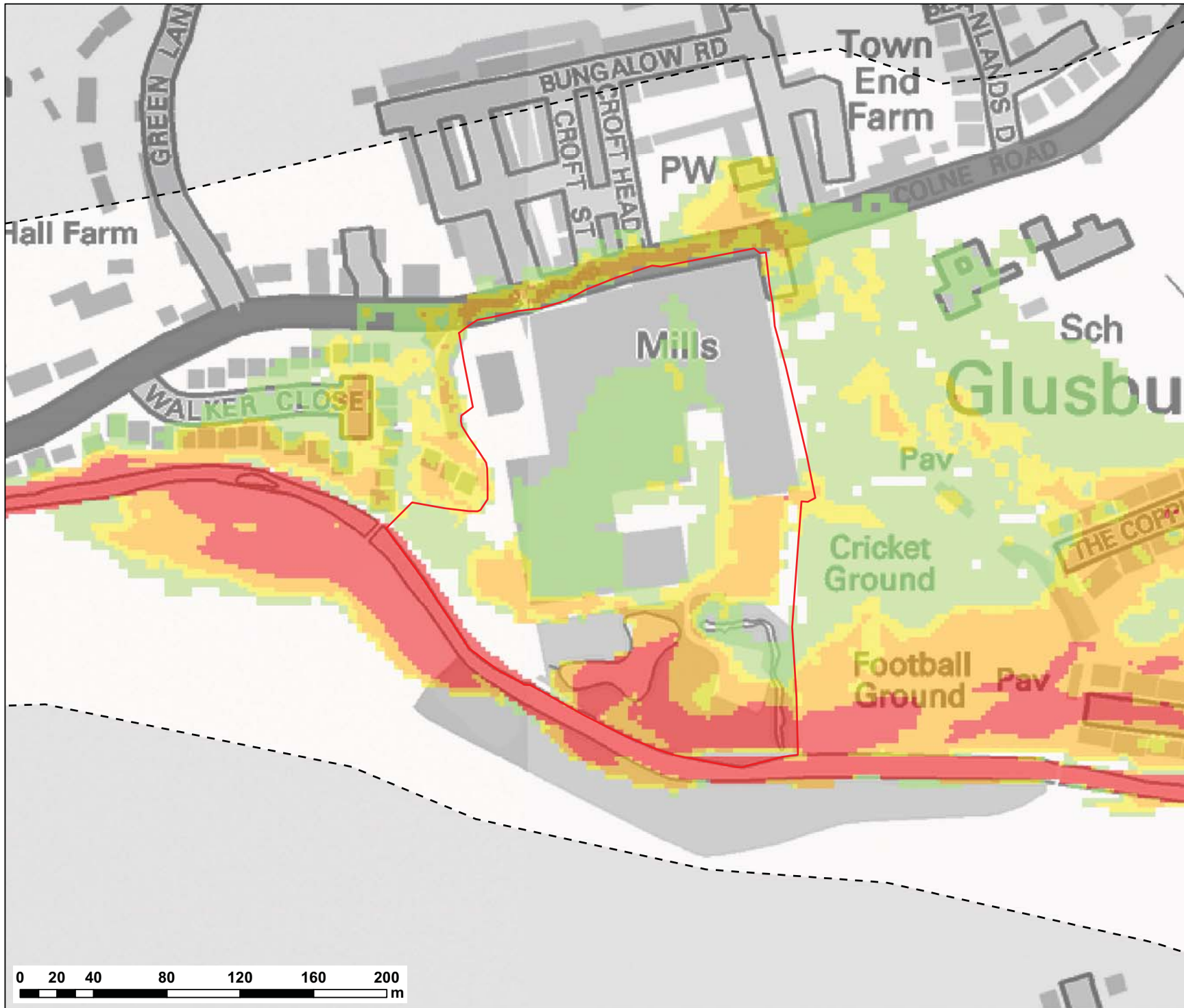
Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ [www.waterco.co.uk](http://www.waterco.co.uk)

SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD HAZARD  
1% AEP + CCA FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 <small>(UNLESS STATED OTHERWISE)</small>
DATE: 09/07/2014		PLOT NAME: w3125-ID03-H	
		REV: -	



**LEGEND**

- Development Site Boundary
- Model Boundary

**Max Flood Hazard (FD2320)**

- < 0.75 (Caution)
- 0.75 - 1.25 (Danger for Some)
- 1.25 - 2 (Danger for Most)
- > 2.0 (Danger for All)

CLIENT:  
**GLUSBURN HOLDINGS LTD**

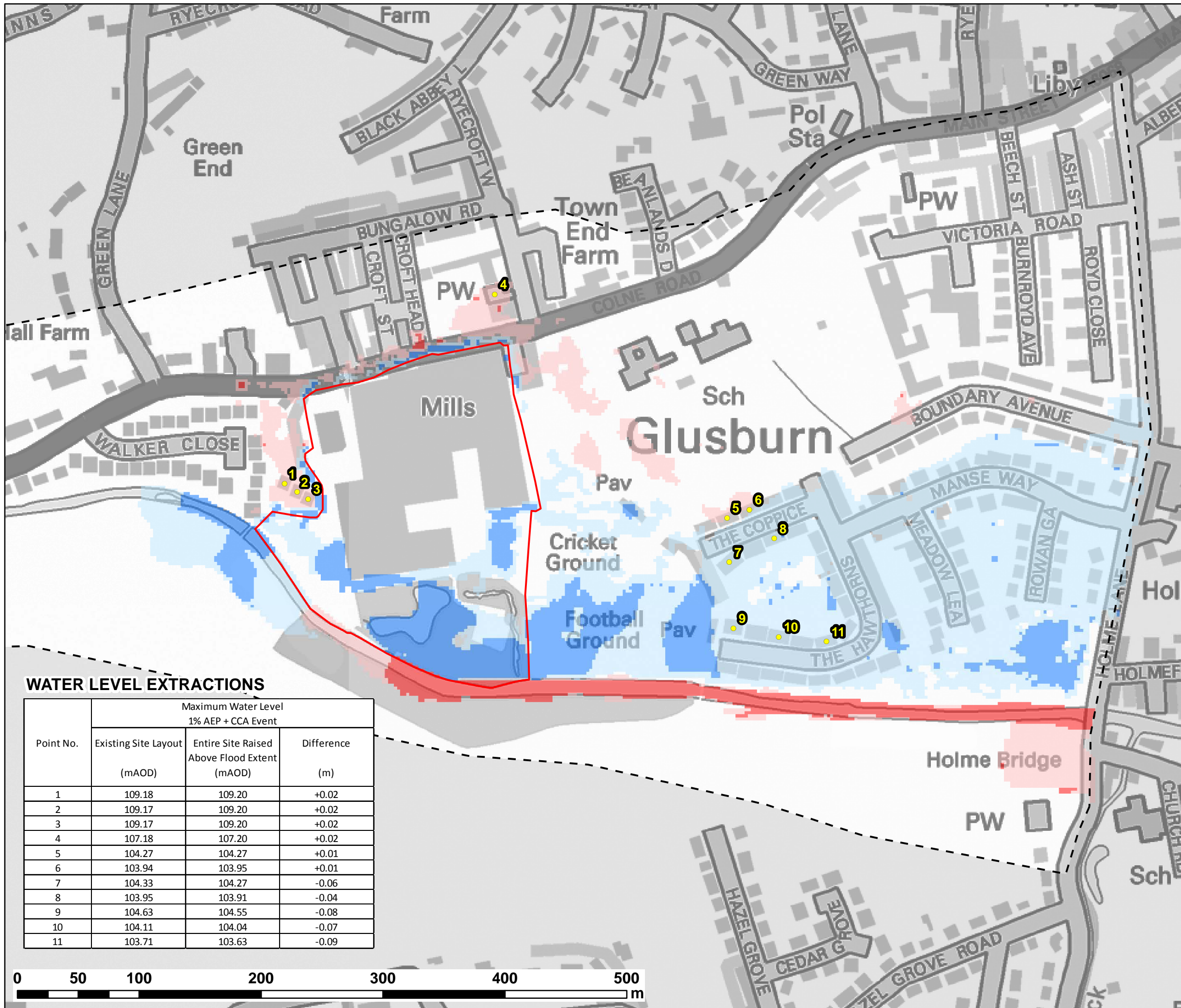
Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ [www.waterco.co.uk](http://www.waterco.co.uk)

SCHEME:  
**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:  
**MAXIMUM FLOOD HAZARD  
0.1% AEP FLUVIAL EVENT  
EXISTING SITE LAYOUT**

PLOT STATUS:  
**ISSUE**

DRAWN: DH	CHECKED: BY	APPROVED: DK	PLOT SCALE @ A3: 1:2,000 (UNLESS STATED OTHERWISE)
DATE: 09/07/2014		PLOT NAME: w3125-ID04-H	REV: -



**LEGEND**

- Development Site Boundary
- Model Boundary
- Water Level Extraction Points

**Max. Water Level Difference (m)**

- > -1.0
- 0.1 to -1.0
- 0.01 to -0.1
- No Change
- +0.01 to +0.1
- +0.1 to +1.0
- > +1.0



**WATER LEVEL EXTRACTIONS**

Point No.	Maximum Water Level 1% AEP + CCA Event		
	Existing Site Layout (mAOD)	Entire Site Raised Above Flood Extent (mAOD)	Difference (m)
1	109.18	109.20	+0.02
2	109.17	109.20	+0.02
3	109.17	109.20	+0.02
4	107.18	107.20	+0.02
5	104.27	104.27	+0.01
6	103.94	103.95	+0.01
7	104.33	104.27	-0.06
8	103.95	103.91	-0.04
9	104.63	104.55	-0.08
10	104.11	104.04	-0.07
11	103.71	103.63	-0.09



CLIENT:

**GLUSBURN HOLDINGS LTD**

**waterco**  
consultants

Waterco Ltd  
Eden Court, Ruthin, LL15 1NJ [www.waterco.co.uk](http://www.waterco.co.uk)

SCHEME:

**HAYFIELD MILLS  
GLUSBURN**

PLOT TITLE:

**MAX. WL DIFFERENCE  
1% AEP + CCA FLUVIAL EVENT  
SITE RAISED VS EXISTING LAYOUT**

PLOT STATUS:

**ISSUE**

DRAWN: DH	CHECKED: AW	APPROVED: DK	PLOT SCALE @ A3: 1:3,000 (UNLESS STATED OTHERWISE)
DATE: 30/10/2014	PLOT NAME: w3125-SR_WL_DIFF	REV: -	

## Appendix C – EA Correspondence

[REDACTED]  
Glusburn Holdings Ltd  
Beck House Kendal Road  
Hellifield  
Skipton  
BD23 4HE

**Our ref:** RA/2016/134661/01-L01  
**Your ref:** GH1405-EA  
**Date:** 19 May 2016

Dear [REDACTED],

**FLOOD MAP CHALLENGE AND DEVELOPMENT ENQUIRY.  
HAYFIELD MILLS, GLUSBURN.**

We have completed an initial review of the flood modelling work undertaken. At present there is insufficient information for us to be able to definitively accept or refuse your request to amend our Flood Map.

The Hydraulic Modelling Report for Hayfield Mills, Glusburn, states that Hydrological data and the Hydraulic Modelling Cross Section Data were both taken from existing Environment Agency data from the model we completed in 2007. Given the age of this work, we recommend that both these input datasets are reviewed, and where necessary updated, to account for the latest information.

The modelling report states that site-specific topographical data was collected in 2008 but that the 2D mapping domain was constructed using 2m resolution LiDAR from 2000. It is unclear why the 2D mapping domain did not make use of the site-specific topographical information available. As such, we recommend that a comparison of the two sources of topographical information be carried out and reported on, with the 2D mapping outputs updated if appropriate.

We would like to highlight that any revised flood outlines would also need to be subject to the Environment Agency's flood zone mapping policy in respect to 'dry islands', which specifies that dry islands will only normally be mapped where they have an area of more than 200sqm (and not less than 10m wide). If these criteria are not met, these areas will be filled in and represented as part of the area likely to flood.

You should be aware that we undertook remote Lidar surveying in the 2015/16 winter, with results to a resolution of 0.5m. The information is likely to be made available later

this summer. We are also commissioning an update to the 2007 Flood Risk modelling/mapping study, with likely completion by March 2017. The study would result in updates to the Flood Map which would supersede any changes which may be agreed as a result of your modelling exercise. The Local Plan and any subsequent planning applications will of course need to be based on the best information available at the time.

We look forward to receiving the additional information. Once received we will be in touch regarding our cost recovery process.

Yours sincerely

**[REDACTED]**  
**Sustainable Places Planning Specialist**  
**Direct dial [REDACTED]**  
**Direct e-mail [REDACTED]**






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**KEY TO UNITS:**

TYPE A	three bed : two&half storey townhouse	7 units
TYPE B	three bed : two storey cottages	9 units
TYPE C	two bed apartments : three storey	18 units
TYPE D	three bed houses : three storey	22 units
TYPE E	three bed houses : three storey	11 units
<b>TOTAL NUMBER:</b>		<b>67 UNITS</b>

REV A access pathway along Beck added, numbers added to each unit 07.08.14

**PULMANN ASSOCIATES ARCHITECTS**  
 Albert Buildings 20A Stockport Road Marple Stockport Cheshire SK6 6BD  
 T: [REDACTED] F: [REDACTED] E: [REDACTED]



SITE AT REAR OF HAYFIELD MILL, COLNE ROAD, GLUSBURN, W. YORKS, BD20 8QP.  
 PROPOSED RESIDENTIAL DEVELOPMENT.  
 INDICATIVE PROPOSED SITE LAYOUT.

scale	1:500	date	NOV 2010	drg no	M10-39-08	rev	A
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