

Pannal and Burn Bridge Parish Council

Harrogate District Draft Local Plan Additional Sites Consultation: Draft Allocation for PN 18.

<https://consult.harrogate.gov.uk/portal/pp/lp/as17/as17?pointId=s149486382842611#ID-4538797-SITE-PN18>

This letter is the official response to the HBC Draft Local Plan (Additional Sites) consultation from Pannal and Burn Bridge Parish Council and on behalf of the residents of the villages of Pannal and Burn Bridge.

Background to the Response. After a full consultation of the residents of the Parish we report as follows:

1. All residents/households in the Parish were contacted by flyer (copy attached – Appendix 1). Of those who responded (30% of households), the vast majority were against the development plans for PN17, 18 and 19.
2. The findings reinforce the survey carried out in 2016 for the previous local plan proposals and therefore, on behalf of our community, the Parish Council is adamant in its continued objection to the additional development proposals for the Pannal area shown in the draft HBC Local Plan (Additional Sites).
3. The PC also wishes to highlight the fact that no notice seems to have been taken to the objections for PN14 voiced in December 2016 and further: that sites PN 17 and 18 are new additions without any prior consultation, and PN 19's significantly increased size (over the original site, PN14) is also without prior consultation.
4. Despite the removal of the threat of a traveller site the new proposals have created significant ill-feeling in the Parish and led to very active, well organised and determined protest groups that are objecting to the proposals but operating outside the auspices of the PC. The plans have generated in excess 700 comments for PN17 and 19 combined, 274 for PN18 and 61 for PN20 (as at 1230 on 24th August). A review failed to find any comments for the proposals – all were against the plans and in addition a large number of emailed objections and letters were copied to the PC.
5. The PC has taken advice from the Consultancy Arrowsmith Associates, and notes that there are significant faults in the HEDNA assessments. These are covered in more detailed in the relevant extracts below. The full report is at Appendix 2.

General Comments applicable to all of the Local Plan proposals (PN17, 18 and 19) for the Parish

- 6. Council isn't addressing the concerns of the local community. Specifically:**
 - a. Over 400 comments were made on online portal objecting to the original plans for Pannal - more than any other settlement in the local plan. This clearly indicated strong local opposition to the plan and the Council's original site assessments raised serious concerns. However, instead of carefully considering these and residents' concerns, the land allocated for housing has expanded by over 100% and a large employment zone has been added. So far, there are over 700 comments for the current consultation; overwhelmingly, these are against the plans.
 - b. The refusal of even a one week extension to the 6-week consultation period to take it beyond the end of the summer holidays has been badly received and has left insufficient time for the PC to seek out the relevant advice and examine the source documents. We consider this to be unacceptable when the proposals would have effects of such magnitude.
 - c. The lack of consultation is in contravention to the Government's guidelines (section 3.61) "to carry out pre-application community involvement in accordance with the council's Statement of Community Involvement (SCI) and to consider the content of Conservation Area Appraisals, Parish Plans and Village Design Statements and Neighbourhood Plans where they exist." We question why the Council has contravened these guidelines.
- 7. Disproportionate growth**
 - a. The added presence of commercial enterprises on PN18 - in one concentrated location close to a small village - will put enormous pressure on its already overstretched facilities for servicing the commercial properties' needs.
 - b. The PC has taken advice from the Consultancy Arrowsmith Associates, and notes that there are significant faults in the HEDNA assessments. These are covered in more detail in the relevant extracts below.

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- 1) "In 2016 policy GS 1 of the then Draft Plan estimated that there was a requirement for 20-25 hectares (ha) of new employment land over the District as a whole. The HEDNA has now replaced this with an estimated requirement of 54.8ha. The HEDNA notes that there is 16ha of vacant land on existing employment sites, leaving a residual requirement of only 38.8ha. The current consultation refers to this as a 'minimum requirement', which it says needs to be increased to provide flexibility of choice and supply. In the light of this assessment the area of additional employment land added to the original 2016 allocation is 26.13ha (net) and 42.84ha (gross).
 - 2) And they further report that it now seems that "...the additional allocations now bring the total to between 44.5ha and 65.3ha compared with the residual requirement of 38.8ha. This is a significant increase."
 - 3) They go on to report that: "This overall approach to employment land allocation suggests that constraining demand has not been a priority in employment land allocation. The approach might be defensible if over-allocation could be achieved without *cost but in the case of site PN18 there are seriously harmful effects* [PC's italics] (as assessed by the Council in their Sustainability Appraisals and discussed under that heading below). That being the case, the over-allocation of employment sites in combination with the costs of developing PN18 constitutes grounds for objecting to that site's allocation." The PC will follow up this line of objection.
- c. The Consultancy concludes that:
- 1) "It clearly makes sense to concentrate new development close to near to District's larger settlements and key public transport corridors where jobs and services are more accessible." The PC believes that the site of PN 18 on the Leeds road, a considerable distance from the main rail links at Pannal and Hornbeam Park and on a busy highway into Harrogate, is not on a "...key public transport corridors where jobs and services are more accessible."
 - 2) And "Furthermore, the Council's intention to promote a major new settlement suggests that it cannot justifiably be accused of not considering radical alternatives. However, when one comes to consider individual allocations, the Borough Council offers no policy guidance other than the Sustainability Appraisals of individual sites."
- d. It is on the basis of unsustainability and the build and natural environments assessments for the PN18 site that the PC has focussed its objections.

8. Coalescence

- a. The reduction in green space caused by this development would cause coalescence between Pannal and Harrogate and contravenes at the very least The National Planning Policy Framework para 79, point d (To preserve the setting and special character of historic towns). Both Harrogate and Pannal have a separate identity and Pannal has been a village community as long as Harrogate has been a nearby town. Both identities are equally valid and need conserving.
- b. One of the fundamental reasons for a Green Belt is to avoid the coalescence of built areas and hence retention of distinct and identifiable communities – the Local plan identifies the space between Harrogate and Knaresborough as vital to prevent coalescence so why is this same thinking not applied to Harrogate and Pannal?
- c. The Crimple Valley is Pannal and Burn Bridge's "Stray" and even if only out of respect for the community, it should be treated in the same way that Harrogate Town treats its own Stray.

9. Local services and Infrastructure

- a. There is an objective to support and maintain local village services. Without the need for a comprehensive review it must be evident that already these are inadequate for the expansion envisaged.
- b. Even with the commercial and retail developments proposed for the Dunlopillo site (as yet unspecified) the sheer volume of people and traffic – based on a 50% expansion of population – would make the demands on existing services untenable. The further plans for PN18 exacerbate an already unsustainable position.
- c. No planning has taken place to consider this and we have yet to see the impact of the expansion of the current Dunlopillo increase of 128 houses and the subsequent commercial developments on every aspect of the local services and infrastructure.

10. Ecology

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- a. Development on the green space between Pannal and Harrogate would take place in an area previously identified as a Special Landscape Area, and would present a significant reduction in the amount of open space, clean air and recreation facilities accessible and hugely important to the village's residents.
- b. In contravention to Objective 19, development would have an adverse impact on the character and appearance of the surrounding countryside and reduce the biodiversity of the area.
- c. The latest British Trust for Ornithology (BTO) list of endangered species has on its Red List of Most Endangered all the woodland and farm species currently present in the development areas (Report: Birds of Conservation Concern 4: the Red List for Birds' was published in December 2015). Twelve of the birds on the Red list are present in the proposed development area.
- d. In addition, PN 18 is home to other fauna that include deer, bats, newts, kingfishers, barn owls, raptors and woodpeckers.

11. Flood Risk

- a. Pannal and the wider Crimple Valley is in a recognised flood risk zone and building additional housing within the area identified in the Local Plan could reduce the effectiveness of the flood plain and cause an increase in flooding.
- b. This is highlighted in the Hydrographical Survey at Appendix 3 and considered in detail in the relevant section below.

12. Traffic and Congestion

- a. Traffic that wishes to visit any new commercial development on PN18 will have to use the A61 which is already busy, especially at peak times. It is not difficult to imagine the impact on the main southern access road into Harrogate of commercial traffic using the proposed site. It is also wrong to assume that there will not be a knock on effect on the surrounding areas, for example, increased traffic on the feeder roads to the main A61 and through Pannal village to gain access to the services there or take the short cuts to the west side of Harrogate.
- b. This, combined with the developments to the West of Harrogate (circa 3000 extra homes applied for in the Harlow and Pannal Ash areas coupled with business expansion planned in the Cardale Park area) is likely to cause total saturation of the road network. This is before any development on PN19 for which the only reasonable access and egress is from the A61, opposite the planned site of PN18.

Specifically for the PN18 proposals we draw the following to the Council's attention.

Comments on the evidence base for this site. The PC has considered the evidence presented in the HEDNA document in consultation with Arrowsmith Associates (full report at Appendix 2), notes:

13. "In 2016 policy GS 1 of the then Draft Plan estimated that there was a requirement for 20-25 hectares (ha) of new employment land over the District as a whole. The HEDNA has now replaced this with an estimated requirement of 54.8ha. The HEDNA notes that there is 16ha of vacant land on existing employment sites, leaving a residual requirement of only 38.8ha. The current consultation refers to this as a 'minimum requirement', which it says needs to be increased to provide flexibility of choice and supply. In the light of this assessment the area of additional employment land added to the original 2016 allocation is 26.13ha (net) and 42.84ha (gross)."
14. And they report that it now seems that "...the additional allocations now bring the total to between 44.5ha and 65.3ha compared with the residual requirement of 38.8ha. This is a significant increase."
15. They further report that: "This overall approach to employment land allocation suggests that constraining demand has not been a priority in employment land allocation. The approach might be defensible if over-allocation could be achieved without cost but in the case of site PN18 there are seriously harmful effects (as assessed by the Council in their Sustainability Appraisals and discussed under that heading below). That being the case, the over-allocation of employment sites in combination with the costs of developing PN18 constitutes grounds for objecting to that site's allocation." The PC supports this line of objection.
16. The Consultancy concludes that:
 - a. "It clearly makes sense to concentrate new development close to near to District's larger settlements and key public transport corridors where jobs and services are more accessible." The

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PC believes that the site of PN 18 on the Leeds road, a considerable distance from the main rail links at Pannal and Hornbeam Park, and on a busy highway into Harrogate, is not one of the “...key public transport corridors where jobs and services are more accessible.”

- b. And “Furthermore, the Council’s intention to promote a major new settlement suggests that it cannot justifiably be accused of not considering radical alternatives. However, when one comes to consider individual allocations, the Borough Council offer [sic] no policy guidance other than the Sustainability Appraisals of individual sites.”
17. Based on the uncertainties of forecasting acknowledged in the HEDNA reports, it is on the basis of unsustainability of the PN18 site that the PC focusses its objections.

Comments on the selection process for this site.

18. The PC objects to the proposals for PN 18 on the following general grounds:

- a. The HEDNA reports indicated a significant increase in the commercial allocations in the revised plan (to a 54.8ha figure if the report is being read correctly). This is a significant increase on the original assessed need. The PC questions the logic behind this figure as the Arrowsmith Associates report (paragraph 3.10) notes that “Flexibility has therefore been worked into the calculation twice and could be used to question the accuracy of the calculation.”
- b. On this basis, the Council have responded to what they perceive is an urgent need to identify more land for commercial use and have plumped for a piece of land that is manifestly unsuitable for a wide range of ecological, sustainability and practical reasons – all clarified in the sections below.

And the PC specifically notes the following:

19. Built & Natural Environment Site Assessments (New Sites 2017)

- a. The Borough Council’s own assessment shows that the site is unsuitable for development whether housing or commercial property - (https://www.harrogate.gov.uk/downloads/file/2712/2017_built_and_natural_environment_site_assessments_new_sites). Specifically, in all categories (Landscape, Conservation and Design, Ecology and Land Drainage) the conclusions overwhelmingly showed a RED rating – see pages 286-291. Specific observations are contained in paragraphs 20 to 23 below.
 - b. Furthermore, the site covers a large tract of arable land that provides an uninterrupted view of the viaduct across the valley to the north and east. This is the view that visitors see whether travelling in to Harrogate from the south by road or rail. It is a vista of real significance and importance to Harrogate.
 - c. On this basis alone, it is inconceivable that the Council should be planning to build on this site.
20. **Landscape Site Assessment.** The Summary conclusion (on page 286) states:
- a. “This is a large site that encroached significantly into the valued landscape of the Crimple Valley. Part of site PN14 take [sic] up the southern part of this site. The development of this area would be a better option in landscape terms allowing for the maintenance of a significant part of the SLA.” The PC notes that this is a misprint or typographical error as PN14 now no longer exists. The conclusion contradicts the assessments above the summary conclusion. Specifically:
 - 1) Physical Sensitivity. Open valley form would be interrupted by built development with loss of pastoral and arable landscape. Should built development take place there would be loss of separation distance and built form coalescence between Harrogate and Pannal.
 - 2) Visual Sensitivity. The site is highly visible from the surrounding road network and interconnected PRoWs.
 - 3) Anticipated landscape effects. Large scale adverse effects due to the loss of open countryside between Harrogate and Pannal and the impact on the special qualities of the SLA.
 - 4) Potential for mitigation and opportunities for enhancement. Large site offers some opportunities for woodland planting but this *would not successfully mitigate the loss of an open area that contributes to the setting of Harrogate and the high quality landscape of the Crimple Valley* [PC’s italics].
 - 5) Likely level of landscape effects. Large scale adverse.
 - b. The wording in the report which is predominantly flagged RED speaks for itself and with these conclusions there should be no development on this site.
 - c. Views. Appendix 4 shows views from the edge of the proposed site PN18. Of note is that the main road approach provides a welcoming vista for road traffic heading into Harrogate with the view

of the Grade II listed viaduct (older, higher and longer than the more famous Ribbleshead Viaduct) would be obscured by even low single storey buildings on the proposed site. In addition, as seen from the railway approach, the views of the Crimple Valley would be shed roofs not the existing landscape. The visual damage to these approaches to the town would be incalculable and a spoil forever one of the town's most appealing approach views.

21. Conservation & Design Site Assessment.

- a. Whilst providing a RED rating in the conclusion (page 288) the assessment goes on to deliver mixed messages about the viability of the site concluding that: "Site boundary unacceptable as proposed, a smaller site could accommodate some development without harmful impacts. Setting of listed Crimple Valley Viaduct would potentially be compromised by development on the site. Vista into and out of the settlement would potentially be compromised. In the same vain [sic], the character of this important and well-used stretch of the Ringway footpath would be significantly altered. Open land that contributes to the setting of Harrogate and the high quality landscape of the Crimple Valley. Very minor development of the area where existing buildings are located may be possible (subject to design, scale, layout, massing etc.) at the southern end of the site, adjacent to road and to the Mercedes-Benz car showroom, ATS tyres and BP garage. Harmful impact on the setting of designated and non-designated heritage assets, particularly the landscape setting of the grade II* listed Crimple Valley Viaduct. Harm caused by the introduction of development into this attractive rural edge to Harrogate and important landscape area. Harm caused by the proposed scale of development on this edge of settlement site."
- b. Even with the mixed nature of the summary conclusions, this is far from a ringing endorsement of the suitability of this site and it is hard to understand why the area is proposed for development.

22. Ecology Site Assessment

- a. The Assessment provides a single RED rating and the summary conclusion on page 290 reads: "The majority of the site is arable farmland of relatively low biodiversity value but the site is in close proximity to the corridor of the River Crimple. There may be the opportunity to create a SUDS wetland associated with the floodplain of the Crimple to the north of the site and to reinforce the wet woodland of the floodplain corridor. Existing trees and hedgerows should be retained and enhanced with new native planting."
- b. The PC finds it strange that with a RED flag the last sentence suggests that local amelioration schemes would suffice. The PC draws attention to the Hydrographical report at Appendix 3. and with land drainage (next section), the site would most likely be commercially unviable for the developer.
- c. In addition to the irreparable damage to the local ecology, the PC believes that the cost to Harrogate of spoiling this vista would be incalculable.

23. Land Drainage Assessment

- a. The Assessment provides only an ORANGE rating and summarises: "Some adverse effects of additional surface water discharge on nearby watercourses but appropriate mitigation should enable development."
- b. Referring to the Hydrographical report we have produced (Appendix 3) it is clear that the risks of development on this land have been massively underestimated. The extract from this report is unequivocal: "The cost and scale of effective flood resilience engineering has been very substantially underestimated. This general issue has been thoroughly documented in the recent HM Government Flood Resilience Review and in EA publications and project reports. Effective mitigation for the Crimple Valley and elsewhere would require expensive civil engineering projects ("Integrated Catchment Management") over unacceptably large land areas. The smaller SUDS (Sustainable Drainage Systems) schemes currently under consideration have very limited efficacy under flash storm conditions."
- c. A further report, submitted to the portal by a resident who is well versed in matters of land drainage (ID1106329), states:
 - 1) Within active flood plain of River Crimple – significant portion within flood zone 3b. EA guidance indicates that residential properties should not be permitted within flood zone 3b.
 - 2) EA document – 'Flood Risk Assessments – Climate Change Allowances' indicates that there will be significant increase of flood zone 3.
 - 3) EA surface water flood map indicates areas of high and medium risk
 - 4) Current flood risk profile will be made worse by large areas of hardstanding
 - 5) Disagree with HBC Site Assessment that SuDS could mitigate impacts of flooding.

24. Sustainability Appraisal – Addendum July 2017.

- a. In the appraisal (<https://consult.harrogate.gov.uk/portal/pp/sa/sa17>) the Summary on P157 it states: “The site is located to the north of Pannal. To the west the site is bounded by the A61 and along the western boundary runs the railway line. There are positive economic effects as the provision of employment land will encourage investment, support local business expansion and may bring opportunities for apprenticeships and training. Positive social affects arise from good accessibility to local services (with the exception of schools). There are significant adverse effects on biodiversity however, there are also positive effects as the site has potential for significant woodland creation and is large enough to incorporate new natural green space and add to green infrastructure. Negative landscape impacts are identified and mitigation opportunities are limited. Further negative environmental impacts arise in relation to the historic environment, where likely harm to the significance of a heritage asset is identified, and in relation to impact on local distinctiveness.”.
- b. Further key points from the Sustainability Appraisal are highlighted here and reinforced in the Arrowsmith Consultancy report’s comments:
 - 1) Biodiversity and the natural environment. Comment: “The generally poor ratings reflecting real costs and it should be noted that the site is designated as a Special Landscape Area in the current Local Plan. The Council’s 2016 Review of Local Landscape Designations suggests that the site should retain SLA status. Once again the Council’s landscape officer gives an opinion which supports the objection and the PC refers to the relevant assessments in Site assessment volume 11 - Nidd to Rainton (2016) and 2017 Built and Natural Environment site assessments and the 2016 October Review of local landscape designations.”.
 - 2) Minimal Pollution Levels. Comment: “Generally poor ratings reflect real costs.”. The PC anticipates that there will be support from the statutory consultees – and re-emphasises that insufficient time has been allowed to seek the views of these consultees.
 - 3) A transport network which maximises access and minimises detrimental impacts. Comment: “Generally poor ratings reflect real costs. The opportunity to provide improvements to public transport may be no more than speculation. No evidence of a feasibility study. The 2015/2016 Travel Model prepared for the Council by Jacobs Consultants did not take account of sites PN17, PN18 and PN19 because they were not included in the 2016 draft plan.”.
 - 4) Greenhouse Gas and Climate Change. Comment: “The fact that the site is not within a flood risk area is in reality the absence of a cost rather than a positive benefit. The distance from public transport is a real cost. Despite the supposed benefits of Pannal as a sustainable location due to good public transport links, PN18 is not within 400m of either a bus stop or railway station.”. PC’s comment – the information on the bus stop is incorrect: there is a bus stop at the Mercedes garage,
 - 5) Protect and enhance the historic environment.”. Flagged RED in the Sustainability Appraisal with the comment: “Likely to result in harm to significance of heritage asset.”. Comment: The poor ratings here reflect real costs.”.
- c. Overall, adverse effects predominate for PN18. The positive effects, where they have been identified, would be experienced by any substantial employment site in any location. The appraisal again suggests the allocation is not justified, in particularly in relation to landscape.

Summary Statement

25. The Council’s approach, which entails potential over-allocation in the interests of flexibility, would be justifiable only if the additional allocations did not have harmful effects. However, in the case of PN18 they clearly do and the harm would be permanent and close the long established green space between Pannal and Harrogate.
26. The PC considers that there is no reason for PN18 to be included in the Draft Local Plan. All the evidence from both the Council’s own assessments as well as the professional Consultancy engaged by the PC confirms that development on this part of the SLA would be detrimental and have an adverse impact on this as well as the Pannal Conservation Area.
27. The sustainability assessments – the Council’s own – support this view and the evidence seen by the PC overwhelmingly supports rejection of PN18 as a site for development.

Appendices

Pannal and Burn Bridge Parish Council

1. Response Leaflet.
2. Arrowsmith Associates Report.
3. Hydrographical survey.
4. Photo montage - PN18 views.

Pannal and Burn Bridge Parish Council

Appendix 1 – Response Leaflet

The PC's leaflet calling for residents to respond is copied below. Over 30% of the residences in the Parish responded and of those that did, they overwhelmingly objected to the proposals.

Please fill in and return in the reply paid envelope our survey section below:

Name(s) - essential
.....

Address (optional)
.....

.....

Contact telephone numbers (optional)
.....

Email – essential if you wish to receive the Newsletter (NL). Tick the box if you already receive our NL

.....

Please use this leaflet plus any additional paper for your reply. Whether you are fervently against any/all of the proposals or agree with some/all of them, we really need to know. For those without email, we will continue with paper copies. Please send your response in the attached FREEPOST envelope to arrive no later than **Friday 11th August**.

For each of the new planning sites, tick the reason for your objection or state if you do not object. You can tick all boxes that apply and make additional comments below:

REASONS FOR OBJECTING	PN17	PN18	PN19	PN20
Increased traffic in an already congested area				
Loss of green space and important wildlife habitats				
Our roads, transport services and links cannot support further development				
Loss of our rural character and village identity				
Visual impact on Crimple Valley				
I do not object to this development				

or add an additional comment here:

Keep up to date - on latest news, meetings, and action you can take by checking the Parish Council website at: www.pannalandburnbridge-pc.gov.uk where we have a Local Plan page.

Thank you, Pannal and Burn Bridge Parish Council.

This leaflet has been prepared and delivered by members of the Parish Council, Protect Our Villages, and other concerned groups and individuals. Comment and join us on our Facebook page - Pannal and Burn Bridge Parish Council.

Pannal and Burn Bridge Parish Council

NEW PLANNING PROPOSALS AFFECTING OUR COMMUNITY

You only have until 25th August to act

Harrogate Borough Council appears to have ignored all the objections to the Local Plan that the PC submitted in December 2016. They now, with the additional sites consultation, propose further building on agricultural land and the Crimple Valley Special Landscape Area – the vital green space that separates Pannal and Burn Bridge from Harrogate. They have ignored our protests that more housing and commercial development will create ever worse traffic congestion through both villages.

Pannal and Burn Bridge has now been redesignated as a Primary Service Village as opposed to a Category B village in the current core strategy - there are implications for this which we will explain at the drop-in meetings. Overleaf is a map of the area and the new proposed sites PN17 (72 houses), PN18 (Employment), PN19 (285 houses), and PN20 (Education facilities).

The Parish Council makes its position clear: it objected to the proposals in December and further objects to the new proposals. We need to secure the views of the residents to confirm and reinforce this.

We have only until 25th August to make our views known to the Borough Council. But here is what you can do:

- Attend one of our drop-in days on 29th July or 5th August from 2.00 - 5.00pm in the Village Hall.
- Make an individual objection on the Harrogate Planning website <http://consult.harrogate.gov.uk/portal>, OR
- Write a letter to Harrogate Borough Council, Planning and Development, PO Box 787, Harrogate, HG1 9RW, OR
- email planningpolicy@harrogate.gov.uk

All this information is on our website - www.pannalandburnbridge-pc.gov.uk but for further information, help or guidance, drop in to one of our open days where we can help you with:

- A chance to view the plans and documentation.
- An understanding of the local plan proposals.
- Discussion of the main points of objection and how to voice your concern.
- Practical help on how to use Harrogate Council's website and what alternative ways there are to register your comments.

For any comments, your **wording must be your own** but we can provide guidance about effective grounds for comments.

Land adjoining Spring Lane Farm, Pannal

Site Reference	PN17
Settlement	Pannal
Existing use	Agricultural
Proposed use	Housing
Gross site area (ha)	3.2309
Net site area (ha)	2.42
Potential yield	72

Employment site south of Almsford Bridge, Pannal

Site Reference	PN18
Settlement	Pannal
Existing use	Agricultural
Proposed use	Employment
Gross site area (ha)	18.3838
Net site area (ha)	9.2840
Potential yield	92,840m ²
Related site	PN19: Land to the west of Leeds Road, Pannal. Please note sites PN18 and PN19 replace site PN14.

Land to the west of Leeds Road, Pannal

Site Reference	PN19 and PN20
Settlement	Pannal
Existing use	Agricultural
Proposed use	Housing
Gross site area (ha)	16.8319
Net site area (ha)	9.26
Potential yield	277, plus land to deliver a park and stride facility and allotments
Related site	PN18: Draft allocation - employment to the south of Almsford Bridge, Pannal. Please note sites PN19 and PN18 replace site PN14. PN20: Draft allocation - educational facilities.

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[response document PN18 - final.docx](#)

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Appendix 2 – Arrowsmith Associates Report

ASSESSMENT OF HARROGATE BC EVIDENCE AND SUGGESTED BASIS FOR OBJECTION TO THE ALLOCATION OF SITES PN17, 18 & 19

FOR PANNAL AND BURN BRIDGE PARISH COUNCIL

IN RELATION TO HARROGATE DISTRICT DRAFT LOCAL PLAN ADDITIONAL SITES CONSULTATION

1. INTRODUCTION

1.1 This report has been commissioned by Pannal and Burn Bridge Parish Council. Its scope is limited by the ceiling agreed with the Parish Council in regard to fees, and therefore the time available to Arrowsmith Associates to carry out research into the Borough Council's evidence base and report accordingly.

1.2 Parish Councils who object to the contents of a Local Plan have an uphill task. In preparing a plan a local planning authority (LPA) should consider the needs of its area as a whole. Land has to be allocated to meet the needs of all its residents and businesses. This involves calculating the need for housing, employment and other land over a long period. The subsequent development inevitably entails the loss of habitats and views, the generation of traffic and demands on services. Since the effects cannot be avoided, the LPA has the task of balancing local gains and losses against the needs of the wider community. For this reason it is rarely sufficient to show that a development will cause harm. It is also necessary to show that development is not needed – which is difficult because it requires interrogating a mass of social and economic background data – or that the need can be met somewhere else with less harm – which is difficult because it involves considering all the alternative sites spread throughout the district. Few Parish Councils have the resources to carry out these wider analyses.

1.3 For the above reasons most Parish Councils concentrate on highlighting the harm caused by the proposals to which they object and then trust the LPA (or the Planning Inspector when there is a Local Plan Examination) to fairly weigh this harm against the other relevant considerations. Inspectors usually recommend only limited changes to a Local Plan once it gets to its examination. This is because a Local Plan is something like a building. Pull out too many bricks and it falls. This is exacerbated by the requirement for an Inspector to find a plan either sound or unsound. In general the best opportunity for changing a draft allocation is when it is first proposed because at that stage the Council have less of a commitment.

2. HARROGATE BC'S EVIDENCE BASE

2.1 There is a series of steps in the collection and evaluation data leading to the allocation of a site in a Local Plan. The first is the calculation of how much development land is needed in the District as a whole. The types of development relevant to sites PN17, PN18 and PN19 are housing and employment. The amount of land required is regularly updated and the calculations underpinning the additional sites now proposed are in the most recent of these, the July 2017 Housing and Economic Development Needs Assessment (HEDNA) prepared for the Council by GL Hearn.

2.2 The second step is found in the Draft Local Plan Growth Strategy published last year. As suggested by its name, this sets out the strategic approach that the Council intend to adopt within the Local Plan and its policies and allocations. The Strategy notes that settlements within, or located in close proximity to, the key public transport corridors have the best access to public transport and therefore to a wide range of jobs, services and facilities within the district but also further afield. It goes on to say that Harrogate, Knaresborough and Ripon are the district's main urban areas and over the plan period will accommodate most of the district's growth. In Harrogate and Knaresborough this will be accommodated primarily through the release of land on the edge of the settlement to deliver urban extensions. In addition, draft policy GS2 provides that there will be some land specifically identified for employment purposes outside the main settlement and that there will be one major new settlement. The current consultation now proposes that this new settlement should be in the Hammerton area.

2.3 The third step is the sustainability appraisal of individual sites. An explanation of the appraisal method is given in appendix 4 to the Council's Sustainability Appraisal of the Draft Local Plan published in October 2016. The sustainability appraisal of the additional sites now proposed is found in the 2017 Sustainability Appraisal Addendum One produced as part of the current consultation. Essentially the

appraisal is a tick-box exercise that draws partly on an ad-hoc analysis of each site and partly on background papers which are on the Council's web site.

2.4 The remainder of this report will examine the three steps described above in greater detail and identify what we consider to be weaknesses that could support the Parish Council's objection to sites PN17, PN18 and PN19.

3. JULY 2017 HOUSING AND ECONOMIC DEVELOPMENT NEEDS ASSESSMENT (HEDNA)

3.1 This report is the basis of the Council's view that it needs to allocate additional housing and employment sites. It is a long (199 pages) and technically detailed document.

3.2 The housing requirement figures in the report can be questioned but, as the report itself makes clear predicting housing requirement is an area of inevitable uncertainty. This may appear in itself to be justification for querying the Council's approach, but all LPAs are required to assess need and if a more accurate assessment cannot be produced in questioning that which the Council use, then this approach is unlikely to be successful.

3.3 The UK has a persistent record of building insufficient housing. Among other results this has led to inflated prices which in Harrogate District are a particular problem. Against this background, even though one could contest aspects of the housing requirement calculation, we do not think this would constitute an effective objection. The work required to do this is well beyond the scope of the time limits available to evaluate the calculation and for the Parish Council to formulate its response.

3.4 One option which may be available to the Parish Council at a later date is to question the three allocations on the basis of need for them in relation to future need assessments as the plan progresses.

3.5 The report's calculation of employment land requirement is a different matter and there is scope here for basing an objection on the assessment in relation to PN18.

3.6 In 2016 policy GS 1 of the then Draft Plan estimated that there was a requirement for 20-25 hectares (ha) of new employment land over the District as a whole. The HEDNA has now replaced this with an estimated requirement of 54.8ha. The HEDNA notes that there is 16ha of vacant land on existing employment sites, leaving a residual requirement of only 38.8ha. The current consultation refers to this as a 'minimum requirement', which it says needs to be increased to provide flexibility of choice and supply. In the light of this assessment the area of additional employment land added to the original 2016 allocation is 26.13ha (net) and 42.84ha (gross).

3.7 We have not been able to trace a figure for the total amount of new employment land allocated in the draft plan as now augmented by the additional allocations but, on the assumption that 22.5ha were allocated originally, the additional allocations now bring the total to between 44.5ha and 65.3ha compared with the residual requirement of 38.8ha. This is a significant increase.

3.8 It is important to consider how the HEDNA derived its 54.8 figure. It calculated the requirement in two ways. The first calculation was based on a labour demand projection. It resulted in a requirement for only 17.6ha. The HEDNA increased this to 28.2ha to give a margin for flexibility. The HEDNA then made an alternative calculation based on projecting development rates from 2006 to 2016. This gave a much higher figure of 49.8ha which is based on separate projections for employment in different use classes.

3.9 The HEDNA prefers the high requirement figure based on trend projections for employment in use classes B1c and B2 (the biggest consumer of land) on the basis that anticipated losses in manufacturing jobs (which partially explain the lower land requirement calculated from the labour demand projection) are compensated by changing industrial practices which require more space per worker. On the other hand, HEDNA prefers the higher requirement figure based on labour demand projection for employment in classes B1a and B1b. The argument is that commercial floorspace analysis and consultation suggest that the growth of this sector has been constrained in recent years by a lack of floorspace.

3.10 In order to calculate the total land requirement figure HEDNA then takes the higher figure based on trends for use classes B1c, B2, B8 and for Sui Generis uses (i.e. uses that do not fit into defined use classes). It again takes the higher figure, which in relation to these use classes, is based on labour demand projection, for employment in B1a and B1b. It should be borne in mind that the requirement for B1a and B1b uses already appears (on the basis of what is reported above) to include an uplift for flexibility, which is in addition to the subsequent uplift for flexibility which the Council have suggested in their draft allocation (as reported in paragraph 3.6 above). Flexibility has therefore been worked into the calculation twice and could be used to question the accuracy of the calculation.

3.11 This overall approach to employment land allocation suggests that constraining demand has not been a priority in employment land allocation. The approach might be defensible if over-allocation could be achieved without cost but in the case of site PN18 there are seriously harmful effects (as assessed by

the Council in their Sustainability Appraisals and discussed under that heading below). That being the case, the over-allocation of employment sites in combination with the costs of developing PN18 constitute grounds for objecting to that site's allocation.

3.12 It is significant that a profligate approach to employment land allocation is not unusual in UK development planning. One can speculate on what effect the approach would have on house prices if applied to housing allocation where over-allocation is normally restricted to a 5% buffer or, in the case of persistent under delivery, 20% (paragraph 47 of the National Planning Policy Framework). We do not suggest that our clients draw attention to the discrepancy since the associated arguments are complex and in this instance do not assist their objection.

4. GROWTH STRATEGY

4.1 It is difficult to question the overall growth strategy as expressed in draft policy GS2 (see paragraph 2.2 above). It clearly makes sense to concentrate new development close to near to District's larger settlements and key public transport corridors where jobs and services are more accessible. Furthermore, the Council's intention to promote a major new settlement suggests that it cannot justifiably be accused of not considering radical alternatives. However, when one comes to consider individual allocations, the Borough Council offer no policy guidance other than the Sustainability Appraisals of individual sites. There is for example no indication of what percentage is implied by the intention to concentrate "most of the district's growth" in the main towns and city. There is no indication of what percentage should be accommodated in extensions to Harrogate as opposed to Knaresborough or Ripon or what percentage of the Harrogate related growth should be located to the north, south, east or west of the town. This throws all the emphasis onto the Sustainability Appraisals.

4.2 This lack of detailed focus within the strategic approach may be something that the Parish Council could use in future objection to the allocations, but the scope of the current consultation is solely to address additional draft allocations and so the criticisms of the growth strategy that we have identified are not relevant at this stage.

4. SUSTAINABILITY APPRAISALS

5.1 Each possible development site has been subjected to a sustainability appraisal. These appraisals are comprehensive. They cover sixteen criteria. These are:

1. Quality housing available to everyone
2. Conditions and services to engender good health
3. Safety and security for people and property
4. Vibrant communities that participate in decision making
5. Culture leisure and recreation facilities available to all
6. Local needs met locally (e.g. bus services, schools and shopping)
7. Education and training opportunities
8. Biodiversity and the natural environment
9. Minimal pollution levels
10. A transport network which maximises access and minimises detrimental impacts
11. Minimise greenhouse gas emissions & managed response to climate change
12. Prudent and efficient use of energy and natural resources
13. Protect and enhance the historic environment
14. A quality built environment and efficient land use patterns
15. Good quality employment opportunities available to all
16. Conditions for business success, economic growth and investment

5.2 We have three reservations about the appraisal method:

- There is huge scope for subjectivity. In some cases this is reduced by reference to supporting background studies (for example on transport, landscape, built and natural environment and flood risk) but for many this allows for criticism of the comments when necessary.
- Many of the criteria depend on the way a site is developed and do not depend on its location. Others depend on social factors, which are independent both of location and the way a site is developed. In both cases the criteria have limited use in evaluating different locations.
- Appraisals will vary from criterion to criterion and from site to site. Without a method of combining all the criteria (including any weighting of considerations) to produce an overall rating for each site there is no easy way to compare sites. The Council have no published method for combining criteria which allows the conclusions to be questioned.

5.3 Despite the reservations expressed above, the sustainability appraisals represent the best available method of commenting on the additional sites. In the next three sections of this report we comment of the appraisal for each of the three sites to which our clients wish to object. We do not consider it necessary to comment on all the individual ratings. We confine our comments to individual points of interest or disagreement and to overall assessment for each site.

6. SUSTAINABILITY APPRAISAL HOUSING ALLOCATION - SITE PN17

6.1 Analysis of the Council's appraisal

1. Quality Housing Available to Everyone

Any substantial site in any location would score well on this criterion.

4. Vibrant Communities that Participate in Decision Making

Any substantial site in any location would score well on the reduction of social isolation. The need to extend the school is a real cost of this location, recognised by the allocation the Borough Council are having to make in that regard.

5. Culture, Recreation and Leisure Facilities Available to all

Any substantial site would score well by providing for recreational needs.

6. Local Needs met Locally

Appraisal correctly gives site a poor overall rating. It is assessment results such as this by the Council's own officers and professional consultees which should be focused on.

7. Education and Training Opportunities

Appraisal correctly gives site a poor rating.

8. Biodiversity and the natural environment

Any substantial site in any location would score well on the provision of green space. The poor landscape rating is a real and significant cost of this location. Not only is the site designated as a Special Landscape Area (SLA) in the current Local Plan, but the Council's 2016 October Review of local landscape designations suggests that the site should retain SLA status. Again this is the Council's landscape officer giving an opinion which supports the objection and should be used as fully as possible. The Site assessment volume 11 - Nidd to Rainton (2016) and 2017 Built and Natural Environment site assessments contain fuller assessments on which these comments were based and should be utilised if possible along with the 2016 review of local landscape designations.

9. Minimal Pollution Levels

Most residential development is unlikely to impact on air quality. Adverse effects on surface water and water courses are real costs but can be mitigated. The Parish Council's contact at the Environment Agency seems to be the best source of support on this issue and should be utilised if possible.

10. A transport network which maximises access and minimises detrimental impacts

The poor rating reflects a real cost in transport terms and should be pursued in regard to Spring Lane even if it cannot be in relation to the other sites. In part this is informed by the result of the 2016 October Harrogate district transport model which may reinforce the grounds for objection.

13. & 14. Protect and Enhance the Historic Environment & A Quality Built Environment

The poor ratings here reflect a real costs.

16. Conditions for Business Success

The site scores no better than any substantial site in any location would on this criterion.

OVERALL

The site scores poorly which suggests the allocation is not justified and an objection on the grounds indicated above would hold weight.

7. SUSTAINABILITY APPRAISAL OF EMPLOYMENT ALLOCATION PN18

7.1 Analysis of the Council's appraisal

6. Local Needs met Locally

Less relevance to an employment site than to a housing site but nevertheless primarily a poor rating

7. Education and Training Opportunities

Any employment allocation would score well on this criterion

8. Biodiversity and the natural environment

Generally poor ratings reflecting real costs.

It should be noted that the site is designated as a Special Landscape Area in the current Local Plan. The Council's 2016 Review of Local Landscape Designations suggests that the site should retain SLA status. Once again the Council's landscape officer gives an opinion which supports the objection and should be used with the support of the relevant assessments in Site Assessment Volume 11 - Nidd to Rainton (2016) and 2017 Built and Natural Environment site assessments and the 2016 October Review of local landscape designations.

9. Minimal Pollution Levels

Generally poor ratings reflect real costs. The aim must be to exploit these with whatever support can be obtained from contacts amongst the statutory consultees.

10. A transport network which maximises access and minimises detrimental impacts

Generally poor ratings reflect real costs. Opportunity to provide improvements to public transport may be no more than speculation. No evidence of a feasibility study.

The 2015/2016 Travel Model prepared for the Council by Jacobs Consultants did not take account of sites PN17, PN18 and PN19 because they were not included in the 2016 draft plan.

11. Greenhouse Gas and Climate Change

The fact that the site is not within a flood risk area is in reality the absence of a cost rather than a positive benefit.

The distance from public transport is a real cost. Despite the supposed benefits of Pannal as a sustainable location due to good public transport links, PN18 is not within 400m of either a bus stop or railway station.

13. & 14. Protect and Enhance the Historic Environment & A Quality Built Environment

The poor ratings here reflect real costs.

15. & 16. Good Quality Employment Opportunities & Conditions for Business Success

Any substantial employment site in any location would score well on these criteria and they should surely

be disregarded for assessing employment sites.

OVERALL

Adverse effects predominate for PN18. The positive effects identified would be experienced by any substantial employment site in any location. Appraisal again suggests the allocation is not justified, in particular in relation to landscape.

7.2 There is the further consideration that the assessed requirement for new employment land has been increased from 20-25ha in the 2016 draft plan to 44.5ha or 65.3ha (depending on whether one uses net or gross figures for the additional sites added in the current consultation). As we have argued in section 3 above the Council's approach, which entails potential over-allocation in the interests of flexibility, would be justifiable if the additional allocations did not have harmful effects. However, in the case of PN18 they clearly do.

8. SUSTAINABILITY APPRAISAL OF HOUSING ALLOCATION PN19

8.1 Analysis of the Council's appraisal

1. Quality Housing Available to Everyone

Any substantial site in any location would score well on this criterion.

4. Vibrant Communities that Participate in Decision Making

Any substantial site in any location would score well on the reduction of social isolation and the opportunity to include community facilities. Again the need to extend the school is a real cost of this location.

5. Culture, Recreation and Leisure Facilities Available to all

Any substantial site would score well by providing for recreational needs.

6. Local Needs met Locally

Appraisal correctly gives site a poor overall rating. This is an opportunity to comment effectively on service and infrastructure inadequacies.

7. Education and Training Opportunities

See comments above.

8. Biodiversity and the natural environment

Any substantial site in any location would score well on the provision of green space.

The poor landscape rating is a real and significant cost of this location. It should be noted that the site is designated as a Special Landscape Area (SLA) in the current Local Plan. The Council's 2016 Review of Local Landscape Designations suggests that the site should retain SLA status.

The evidence base documents mentioned under this heading for the other sites provide further ground for objection to the allocation of PN19.

9. Minimal Pollution Levels

Most residential development is unlikely to impact on air quality.

Adverse effects on water courses are real costs but can often be mitigated.

Proximity to a main road a real but manageable cost.

There is nevertheless a marginal negative rating, which if supported by contacts amongst the Parish Council's external consultees are worth pursuing.

10. A transport network which maximises access and minimises detrimental impacts

Pannal and Burn Bridge Parish Council

Relatively poor rating reflects real costs.

Opportunity to enhance existing rail facilities may be no more than speculation. No evidence of a feasibility study.

The 2015/2016 Travel Model prepared for the Council by Jacobs Consultants did not take account of sites PN17, PN18 and PN19 because they were not included in the 2016 draft plan.

13. & 14. Protect and Enhance the Historic Environment & A Quality Built Environment

Poor ratings here reflect real costs

OVERALL

The site scores poorly which suggests the allocation is not justified. Again landscape appears the strongest ground.

9. CONCLUSION

9.1 On the basis of the Council's own sustainability appraisal the three sites – PN17, PN18 and PN19 perform poorly. However, much new development performs poorly when seen in isolation. It can nevertheless be justified by the wider needs of society which needs land for housing, employment, infrastructure and services. A planning authority must therefore allocate enough land to meet these wider needs while minimising the inevitable adverse effects.

9.2 Nonetheless, the strength and amount of negative assessment within the sustainability appraisals give grounds for well-founded objection to the allocation.

9.3 Our research reinforces the reasons for objecting discussed with the Parish Council and we hope, gives them insight into the evidence base and background used by the Borough Council.

9.4 This in turn should demonstrate which of the evidence base documents can be quoted in support of the objection and which arguments will be more difficult to justify.

9.5 Landscape impacts are the primary consideration for all of the sites and our research shows that this is the area where the Borough Council's own assessments best support the Parish Council in objecting.

9.6 As we have said above Parish Councils and those advising them rarely have the resources to take the wider perspective, which involves the competitive assessment of all the sites within a district. Even so, in the present case, and on the Borough Council's own analyses, the three sites perform so poorly that it is likely that alternative locations will meet the calculated land requirements at less cost and with greater benefit. In the case of employment there is evidence that the draft plan, as augmented by the additional sites now identified, has over-estimated the required land supply. This might be a justified approach when over-allocation has few negative effects but in the case of site PN18 these are sufficient to justify removing the allocation even if no alternative allocation elsewhere in the District is identified.

Arrowsmith Associates

August 2017

Hydrology of the Crimble Valley Catchment Area

The following is a brief outline of scientific, procedural, and economic concerns relevant to the hydrology and flood resilience of the Crimble Valley. These considerations, which are expanded in more detail in our full report, support the case that this sensitive hydrological catchment basin should remain in its current, largely rural, condition.

The Crimble catchment area (Figure 1) includes the housing and employment draft site allocations PN17, PN18, PN19 and PN20 of the Harrogate Borough Council (HBC) Local Plan, and other major building proposals such as those for the Dunlopillo-Buttersyke Bar section of Green Belt.

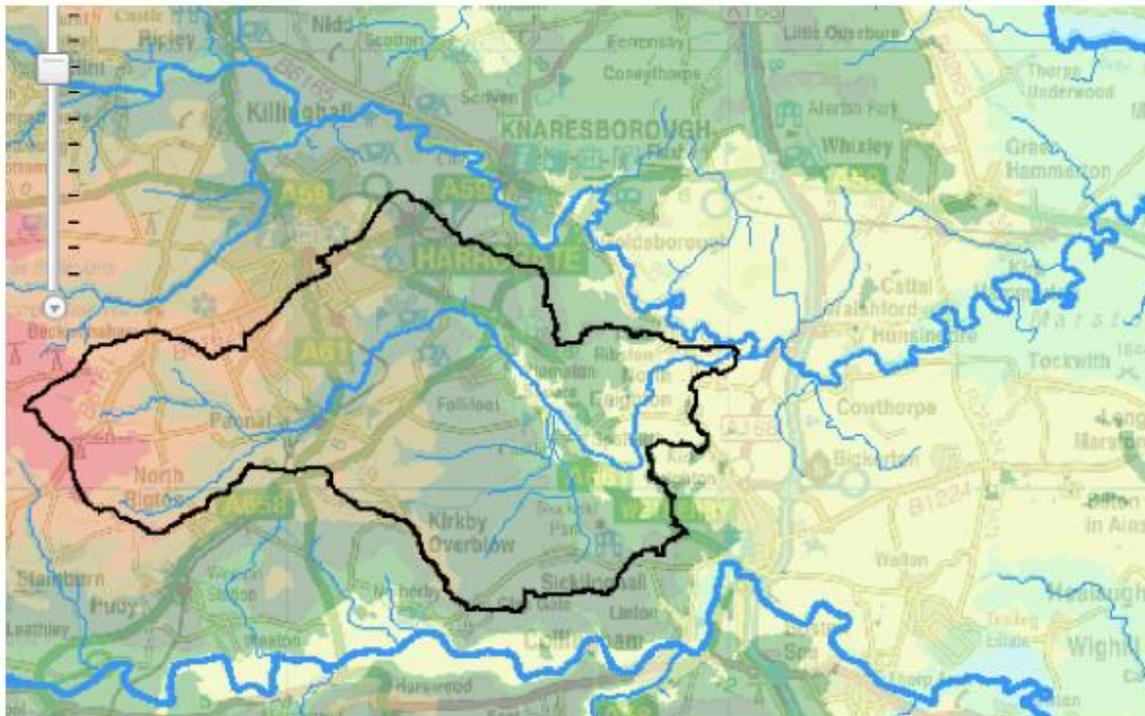


Figure 1. The Crimble catchment area (black outline) superimposed on an OS map with colour-shaded topography. Parts of the Rivers Nidd and Wharfe are also shown, respectively to the north and south of the Crimble. Data from the National River Flow Archive, Centre for Ecology and Hydrology, Natural Environment Research Council.

The reasons listed below overwhelmingly indicate that the entire catchment basin should be excluded from the HBC Local Plan and from any HBC Planning considerations for major building development. These are topics which the HBC site selection procedures and Built and Natural Environment Site Assessments (BNESA, 2017) assessments have not yet considered with sufficient diligence. Indeed, the HBC proposals for the Pannal sites could be construed as failing to meet Planning soundness criteria for (a) hydrological aspects of environmental sustainability and (b) consistency with current national policy as it relates to flood resilience and flood management plans.

These concerns fall into four main topics:

- 1. The hydrological problems and flood risk of the Crimple basin are substantially greater than has been considered in HBC's Planning exercises. This is supported by well-established sound scientific records and other independent evidence, all readily and publically available.**
- 2. The conventional Environment Agency (EA) Flood Risk Zone assessments, at least for the Crimple Valley, no longer provide an adequate basis for the allocation and assessment of priorities among potential sites for major building developments. The need for additional considerations, even at an early stage of Planning, is unequivocally clear from more recent major HM Government national policy documents and EA publications on Flood Resilience.**
- 3. The remaining rural land of the Crimple Valley provides an essential component of the buffer zones that mitigate the flow of storm water into the exceptionally flood-prone Nidd and Ouse basins. Undeveloped rural buffer zones are especially critical in catchments with the hillslope and flash flood hydrological characteristics of the Crimple basin.**
- 4. The cost and scale of effective flood resilience engineering has been very substantially underestimated. This general issue has been thoroughly documented in the recent HM Government Flood Resilience Review and in EA publications and project reports. Effective mitigation for the Crimple Valley and elsewhere would require expensive civil engineering projects ("Integrated Catchment Management") over unacceptably large land areas. The smaller SUDS (Sustainable Drainage Systems) schemes currently under consideration have very limited efficacy under flash storm conditions.**

Topics 1 and 2 are explained further in the bulleted points below, and all topics are to be fully referenced and expanded in detail in our full report currently under construction.

- The physical hydrology of the Crimple Beck basin has long been studied and the underlying scientific principles are exceptionally well understood. It is the classic example of a catchment area showing subsurface responses to rainfall runoff in the upland hillslopes, overland flows, saturation of the lower sideslopes, and frequent flash floods in the main channel.
- The physical principles underlying the Crimple basin response to rainfall were established in the 1970s through pioneering predictive modelling studies by two of Britain's most accomplished hydrologists, Professor Keith Beven FRS and Professor Mike Kirkby:
<http://www.tandfonline.com/doi/pdf/10.1080/02626667909491834?needAccess=true&redirect=1> This is one of the most influential publications in the entire field of hydrology with over 5000 citations in the peer-reviewed literature.

- Subsequently, 45 years of daily streamflow records have been recorded by the EA Burn Bridge monitoring station and are publically available from the National River Flow Archive at: <http://nrfa.ceh.ac.uk/data/station/meanflow/27051> (the graph shows peaks of multiple flash flood events throughout the 2015/2016 winter and the unprecedented extreme peak flow of late December 2015).
- The Crimple Beck data archives provide local evidence for two trends since the 1990s: (a) extreme flash flood events have intensified, and (b) the winter baseline streamflows (i.e. the seasonal norm that persists between flash floods) have increased, whereas the normally low summer baselines may have somewhat decreased.
- Experiences of Crimple Valley residents, and local historical records, are in accord with this scientific perspective and data: dramatic damaging flash floods, persistently waterlogged lower slopes through the winter months (e.g. on the PN19 site), and streams of runoff water frequently flowing overland in locations where natural drainage and storm drain systems have become overwhelmed (e.g. from the Clark Beck sub-catchment onto the PN17 site).
- To add credibility to the increased probability of flash floods, the same trends seen in the Crimple Beck data are present more strongly in regionally aggregated national data, especially for catchments throughout the North of England, Scotland, and Wales.
- These trends parallel the greater probability of extreme monthly rainfall as conservatively recalculated for the present prevailing atmospheric regimes by Met Office Hadley Centre scientists. A summary of this work is in Annex 2 of the HM Government September 2016 publication – National Flood Resilience Review. (HMG-NFRR): https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551137/national-flood-resilience-review.pdf
- This Met Office analysis has been widely supported by risk analysts, including in other branches of Government and in the re-insurance industry. Importantly, it gains credibility by avoiding any alarmist implications and by being based only on the current prevailing meteorological conditions as they affect the UK.
- In a caveat that is relevant to Crimple Valley, the Met Office adds that the probabilities for short intense flash storms or for rainfall extremes in upland or mountainous locations are not included in their model but are likely to be even greater than the increased national or regional monthly extremes they conservatively calculate.
- In contrast, the EA flood risk assignments for the Crimple Valley, notably the Zone 1 areas (less than 0.1% risk per annum), appear to systematically underestimate the flood risk and are inconsistent with the physical and observed reality.
- The concept of a 1:1000 risk is readily understood, and residents have been justifiably skeptical of the EA Zone 1 assignment given to most of the PN19 site; in contrast, in the real world, that particular section of Pannal Meadows was partially inundated by Crimple Beck flash floods during 2000 and 2002 and extensively flooded during June/July 2007, January 2014 and

December 2015. Similar discrepancies apply to the overland flow on the PN17 site higher on the hillslope.

- However, the EA has always acknowledged that many such discrepancies exist in the National Flood Risk Assessment (NaFRA) maps, as has the insurance industry. Accordingly, the EA is currently in the early stages of a multiyear project to update the assessments in more detail ("NaFRA2") and, especially, to incorporate the more complex lessons learned from the extreme floods of 2007, 2014 and 2015.
- The public EA literature on the NaFRA maps has always included many caveats and carries legal disclaimers. Relevant caveats include (a) the relatively low spatial resolution of flood risk models, (b) that the models are based on national or regional parameters and important local factors are often ignored (e.g. often omitting topographic details of smaller flash flood prone catchments as typified by the Crimple), and (c) assessments are only infrequently updated and may become obsolete when conditions change.
- This raises a dilemma for planners as to whether the current NaFRA zones should still be used for planning purposes. How does the Planning process meet its obligations under sections 100 and 101 of NPPF?
- An appropriate current procedure would be to continue to refer to NaFRA Zones, but only in a strictly limited preliminary way as a general approximate indicator of areas of land where flood risk from rivers or sea might exist. Given the many caveats about Zone assignments, planners are obliged to exert careful diligence and actively seek additional pertinent information (e.g. policy documents such as HMG-NFRR, independent public documents such as those cited here, and well informed local input) as a basis for recommendations and decisions, even at an early planning stage.
- Consequently, one principal procedural failing of the HBC and BNESA exercise has been to interpret the EA NaFRA flood risk zones too literally, especially during allocation and prioritisation of the sites considered in the HBC LP allocations.

Abbreviations for government documents cited:-

NPPF: HM Government - National Planning Policy Framework. March 2012

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

HMG-NFRR: HM Government – National Flood Resilience Review. September 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551137/national-flood-resilience-review.pdf

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Pannal and Burn Bridge Parish Council

Appendix 4 – Photo montage PN18 views.

Views are from the A61 towards the proposed site of PN18 - captions indicate location of the shot.

View to the Viaduct from the A61 – un-encumbered. The vista visitors expect to see from the road.



From the front of the Mercedes Garage. Note how from foot or vehicle level, the line of cars partially obscures the vista. With single story buildings, this sight line will be obscured completely.



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This view demonstrates the already busy nature of the road – note the existing signs, the bus stop and encroachment of the Mercedes garage into the view already. With commercial premises on PN18 the additional business signage, highways signs and general street clutter will significantly increase.

