

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
General	Comment – strong linkages between climate change, flood management, green infrastructure and minerals planning agendas.	11/11684	North Yorkshire County Council
	Comment – it would be desirable to consider somewhere how the effects of flooding on the historic environment, especially to listed buildings, as an ‘other threat’ might be mitigated or at least taken into consideration by flood risk management, whether existing or anticipated. This could be mentioned in the ‘Local Context’ paragraphs, or included under e.g., the ‘Highly Vulnerable’ classification in Table 19.1.	188/13951	
	Comment – recognise the value of and support the introduction of a sustainable design and construction SPD to support this policy area.	190/13976	York Consortium of Drainage Boards
	Support – flooding is a major issue that needs addressing and The Plan not only addresses the impact of flooding but impact on flooding.	525/16646	
	Comment – surface water management is certainly a problem for many recent developments and the fluctuations on the water table have serious implications for both existing and future built structures and the effects on drainage.	2416/6681	
	Support – agree with the preferred approach.	6508/17684	City Of York Council Conservative Group
	Comment – no objection.	6516/16340	City Of York Council Liberal Democrat Group
	Comment –there doesn’t appear to be sufficient reference in this part of the report to the need to consider this whole issue in the wider systemic sense by considering the whole water catchment or river basin.	6518/16426	York Green Party
	Objection – building on the flood plain in Greenfield sites should be restricted. Developments on hillsides can lead to surface water flooding during storms and this should be taken into account.	6519/16486	Cllr Jenny Brooks

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy FR1 Flood Risk	<p>Comment – rather than quoting the NPPF tables verbatim, Policy FR1 should make reference to the relevant parts, and also its own strategic flood risk. By taking out table 19.1, it frees up four pages and makes the policy easier to read. In regards to the catchment flood management plans, a number of actions of relevance to planning have been omitted. Recommend further actions, it is also important that a caveat is made regarding the future of these plans.</p> <p>Objection – Para 19.2, believe that this should be included within Policy FR1: ‘A sequential approach to the layout of the site must be located within the area of lowest risk. Areas of greater risk (i.e.; flood zones 2 or 3) should be utilised for green infrastructure spaces’.</p>	3/11629	Environment Agency
	<p>Objection – wish the alternative options of Option 1 for flood risk and option 1 for flood risk management.</p>	77/12773	Strensall with Towthorpe Parish Council
	<p>Support – Policy FR1 and see it be reflective of current policy and practices and robust enough to permit a suitable approach to future developments.</p>	190/13977	York Consortium of Drainage Boards
	<p>Support – restrict all new developments in the floodplain.</p>	433/16564	
	<p>Comment – flood risk management land is managed on the River Foss, why not Ouse or Derwent management also?</p>	1109/17209	
	<p>Objection – to identify a requirement for project Flood Risk Assessments (FRAs) to include assessments of the potential impacts of changes in flood risk and associated management measures on the Lower Derwent Valley’s statutory conservation designations. There should also be a requirement to identify appropriate mitigation measures where necessary. This is to ensure that all project specific issues, which may not be fully assessable at the Local Plan stage, are robustly considered and addressed.</p>	1399/17369	RSPB
	<p>Support – supportive of FR1.</p>	2846/7569	
	<p>Comment – the drainage/sewerage system, and consequent flooding, needs urgent attention. It cannot withstand more and more pressure from more and more developments without being brought up to date.</p>	2995/7786	
	<p>Comment – restrict all new development in the flood plain. New developments will not be permitted to allow outflow from ground water and/or land drainage to enter public sewers.</p>	3181/8183	
	<p>Comment – this should be reviewed with the aim of requiring more ‘Exception Testing’ in Flood Zones 1 and 2.</p>	3356/8591	
	<p>Comment – further technical consideration could be given to the flood alleviation strategy in the area adjoining the River Ouse along Queensgate.</p>	3395/8700	Lindum York

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy FR1 Flood Risk Continued	Objection – opposed to FR1.	4819/14301	York Environment Forum (Natural Environment Sub Group) & Treemendous York
	Comment – sewerage system spilling out on to the fields and dykes, surely this is a problem that should be sorted out quickly also the mains water supply has flooded the main road twice.	5129/12243	
	Comment – the Plan should restrict all new development on Greenfield sites in the flood plain. The Plan should require all new development to contribute to long term climate change measures. The Plan needs to recognise that settlements located on the sides of hills can be prone to surface water flooding during storms, in this case in Dunnington.	5178/12368	
	Support – preferred approach to flood risk management.	5427/14747	
	Comment – there should be no exceptions to building on flood risk zones 3a or 3b.	5674/13370	
	Comment – where is the Plan to protect the village (Acaster Malbis) from flood due to the fact that you are proposing to build on the natural soak a ways around the city of green belt as well as the natural flood planes such as Germany Beck.	5750/13571	
	Object – 20,000 more houses, surface water, causing flooding.	6200/15733	
	Comment – any remedial measures for flooding have to consider the planting of trees in the upper catchment areas to facilitate the slower movement of water into the ground and the slower release of water downstream. Any new building that is placed on the flood plain should have built-in water protection/proofing for the first storey as a minimum requirement, with appropriate means of escape. This is based on the probability that flooding will continue to happen with increasing frequency, and that, if these measures are taken, initial additional cost to all buildings will be much less than future costs of not doing this.	6518/16427	York Green Party
Para 19.03	Objection – paragraph 19.3; believe the Council should be taking a more positive stance and seek betterment from developers to mitigate against future flood risk. This could be in the form of restricting new development on Greenfield sites to the existing run-off rate from a lower order storm event, e.g. a 1 in 1 year storm.	3/11630	Environment Agency
Para 19.04	Comment – wider sustainability benefits outweigh/balance flood risk (such as building on strategically important brownfield land) new developments in flood vulnerability classification zones 3a or 3b should be build with flooding in mind, to design specifications that offer appropriate levels of protection. Support – The preferred options on flood risk management, particularly the use of Sustainable Drainage Systems cited in Policy FR2.	1665/12971	York Environment Forum

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy FR2 Surface Water Management	<p>Support – Policy FR2 where it is stated that for development on brownfield sites there should be a 30% reduction in surface water run-off.</p> <p>Objection – For both brownfield and greenfield sites, the standards of attenuation storage should be provided and the following wording; ‘Sufficient attenuation and long term storage should be provided to accommodate at least a 1 in 30 year storm. Any design should also ensure that storm water resulting from a 1 in 100 year event, plus 30% to account for climate change, and surcharging the drainage system can be stored on the site without risk to people or property and without overflowing into a watercourse’. Also suggest that you consider how you will incorporate sustainable drainage approval boards (SABS) into this policy as these are likely to be in place by the time the Local Plan reaches submission stage. Support the paragraph in FR2 stating ‘measures to restrict surface water run-off’. The next sentence is too prescriptive for a policy and a more fitting sentence is ‘The type of SuDS used should be appropriate to the site in question and should ensure that there is no pollution of the water environment including both ground and surface waters’.</p>	3/11631	Environment Agency
	<p>Support – policy particularly the inclusion of measures such as green roofs and Sustainable Urban Drainage (SDS) in developments.</p>	42/11719	Yorkshire Wildlife Trust
	<p>Objection – the drainage system is currently unsatisfactory in Haxby. Recently there has been another drainage failure. Whenever there is heavy rain there is flooding with drains blocked and with sewerage coming up in houses, roads and gardens.</p>	63/12726	Haxby Town Council
	<p>Objection – wish the alternative options of Option 1 for flood risk and Option 1 for flood risk management.</p>	77/12774	Strensall with Towthorpe Parish Council
	<p>Support – see policy as reflective of current policy and practices and robust enough to permit a suitable approach to future developments.</p>	190/13978	York Consortium of Drainage Boards
	<p>Comment – supportive of Policy FR2 which advocates the use of SDS within new developments. Involvement needed in the design and feasibility of SDS in all new developments where the system will eventually communicate with a public sewer. Wording should be included within the text to encourage developers to open dialogue at an early stage. This will become critical once the legislation for compulsory adoption is introduced in April 2014. Adoption (2012) of the City of York Surface Water Management Plan, links to this plan could be strengthened.</p>	295/14162	Yorkshire Water Services Ltd
	<p>Support – require all new developments to adopt specific flood mitigation/surface water drainage/groundwater protection measures (preferred approach).</p> <p>Comment – Existing surface water drainage is inadequate in many parts of Copmanthorpe – this needs to be tackled urgently. Drains need to be regularly</p>	433/16565	

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	checked and cleaned.		
Policy FR2 Surface Water Management Continued	Comment – would compromise its viability. This is not reasonable. SDS is essential and therefore must be factored into costs.	1109/17210	
	Objection - requirement is excessive. Should not apply to very small projects, often impractical and/or prohibitively expensive. It should only be demanded on larger sites of ten or more dwellings.	1526/17520	Laverack Associates Architects
	Objection – full planning applications submitted shall include a detailed topographical survey and drainage details. Considered that such requirements not be applicable to all full planning applications. Any requirements for information as part of a planning application submission should be exercised via the local validation checklist and not the Local Plan. Recommend that this last section of the policy is deleted.	1668/15043	Barratt & David Wilson Homes
	Support – supportive of FR2.	2846/7570	
	Comment – the drainage/sewerage system and consequent flooding needs urgent attention. It cannot withstand more and more pressure from more and more developments without being brought up to date.	2995/7787	
	Comment - restrict all new development in the flood plain. New developments will not be permitted to allow outflow from ground water and/or land drainage to enter public sewers.	3181/8184	
	Objection – this requirement is excessive. It should not apply to very small projects of just a few dwellings where it is often impractical and /or prohibitively expensive. It should only be demanded on larger sites of ten or more dwellings.	4362/11310	
	Objection – opposed to FR2.	4819/14302	York Environment Forum (Natural Environment Sub Group) & Tremendous York
	Comment – sewerage system spilling out on to the fields and dykes, surely this is a problem that should be sorted out quickly also the mains water supply has flooded the main road twice.	5129/12244	
	Comment – the Plan should restrict all new development on Greenfield sites in the flood plain. The Plan should require all new development to contribute to long term climate change measures. The Plan needs to recognise that settlements located on the sides of hills can be prone to surface water flooding during storms, in this case in Dunnington	5178/12369	
Comment – if it is not technically possible to incorporate sustainable drainage systems the development should not be approved. If the problem lies with the development, it should be redesigned: if the problem lies with the site, it is not a viable site and should	5767/13641		

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	be removed from the plan.		
Policy FR2 Surface Water Management Continued	Comment – it seems that there are too many ways in which a developer could potentially avoid using techniques to meet this requirement.	5780/13677	
	Object – 20,000 more houses, surface water, causing flooding.	6200/15734	
	<p>Objection – the policy states that all full planning applications shall include a detailed topographical survey showing existing and proposed ground and finished floor levels, along with complete drainage details. Not considered that this is reasonable, proportionate or appropriate to require such information to be submitted in the case of householder planning applications and this must be made clear within the policy. This information would rarely, if ever, have any bearings on the outcome of the application. It would also be difficult to provide such information in the case of first floor extensions and dormers.</p> <p>Comment – good to see that the restriction of surface water run-off rates will be required where technically feasible and financially viable. In contrast to the Council’s Strategic Flood Assessment, which states that all development will be subject to a requirement to migrate surface water run-off rates, and does not take into account the scale of development being considered. There is a case for providing further clarification in the supporting text to Policy FR2 which states that residential extensions will not be subject to this requirement, other than in exceptional circumstances. Householders are encouraged to adopt sustainable drainage methods such as the installation of water butts, use of green roofs or the use of porous materials for hard surfacing.</p>	6520/16491	City Of York Council Development Management

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy FR3 Ground Water Management	Objection –issues with policy FR3 and feel this policy is neither clear enough nor robust enough to take account of Drainage Board issues.	190/13979	York Consortium of Drainage Boards
	Comment – ground water management and the text in 19.7 and 19.8 appear to be lightly confused. The policy states that new development will not be permitted to allow outflow from ground water/and or land drainage to enter public sewers. It also calls for existing land drainage systems within new development to be adequately maintained. Suggest seeking further clarification on these issues and consider separate policies on land drainage and ground water management.	295/14163	Yorkshire Water Services Ltd
	Comment – the drainage/sewerage system and consequent flooding needs urgent attention. It cannot withstand more and more pressure from more and more developments without being brought up to date.	2995/7788	
	Comment – restrict all new development in the flood plain. New developments will not be permitted to allow outflow from ground water and/or land drainage to enter public sewers.	3181/8185	
	Objection – opposed to FR3.	4819/14303	York Environment Forum (Natural Environment Sub Group) & Treemendous York
	Objection – 20,000 more houses, surface wate, causing flooding.	6200/15735	

York Local Plan Preferred Options – Summary Of Responses
Section 19: Flood Risk Management Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Question 19.01	Objection – the plan should restrict all new development on Greenfield Sites in the flood plain. The plan should require all new development to contribute to long term climate measures. The plan needs to recognise that settlements located on the sides of hills can be prone to surface water flooding during storms. This is the case in Dunnington. CYC should enforce planning rules in regard to paving over gardens and extend these to side and rear gardens.	59/12673	Dunnington Parish Council
	Support – agree Preferred Options 4 and agree Preferred Option 2.	188/13952	
	Support – agree with the Preferred approach.	190/13980	York Consortium of Drainage Boards
	Comment – the growing use of hard paving in front gardens need to be tackled in the Plan.	671/16830	
	Comment – all new developments in the flood plain area should be restricted in order to minimise flood damage.	943/16965	
	Support – agree with preferred approach.	1109/17211	
	Objection – reject the preferred approach. Restrict all new developments on Greenfield sites in the flood plain. Require all new developments to contribute to long term change measures. The Plan needs to recognise that settlements located on the sides of hills can be prone to surface water flooding during storms. This is the case in Dunnington where serious Surface Water flooding occurs during storms. In this regard CYC should also enforce planning rules in regard to the paving over of gardens and extend these to side and rear gardens.	1457/17428	
	Support – the preferred approach to flood risk.	1736/9835	Oakgate Group Plc