

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.
(Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM127

5. Do support or object the proposed main modification?

Support

Object

X

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

X

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

X

Consistent with National Planning Policy (the NPPF)

X

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

Climate Change – one of the principal drivers of Climate Change is the release of carbon into the atmosphere mainly as carbon dioxide. "Blanket Bogs" are important "carbon sequestration assets" because their formation removes and traps carbon (approximately 20% of all UK terrestrial carbon is stored in upland moorland habitats in the UK). However when bogs are destroyed either by draining, burning, dog activity or trampling / erosion, the trapped carbon is liberated to the atmosphere, thus contributing to global warming and climate change. As described in the comments on MM28 ACS believes the mitigation measures proposed to counter the large projected population increase within a 7km radius of the Ilkley / Rombalds Moors SAC / SPA / SSSI will only have a limited impact. As a result the "Blanket Bog" will suffer further degradation, releasing carbon into the atmosphere and contributing to Climate Change. NPPF Section 95 states "To support the move to a low carbon future, local planning

authorities should plan for new development in locations and ways which reduce greenhouse gas emissions". By failing to adequately protect essential moorland habitat in respect of carbon release from degraded "Blanket Bog" this modification is not effective, contravenes the NPPF, and is therefore unsound.

Flooding – climate change experts have been predicting an increased frequency and intensity of UK storms for some time. The last few months of 2015 and the first half of January 2016 have fulfilled this prediction. Weeks of rain punctuated by intense storm episodes have completely saturated the ground leading to substantial rapid runoff in the local river catchments of the rivers Wharfe and Aire. This has resulted in catastrophic flooding and infrastructure destruction downstream, notably in Leeds and Tadcaster. It is recognised that purely trying to mitigate these impacts in the floodplain by building ever higher flood walls and structures is both undesirable and in some cases impractical.

This has led to statements from the Environment Agency calling for a complete rethink of the nation's flood strategy with particular reference to river catchments. This sentiment was echoed by the Leader of Leeds City Council who demanded on BBC's Look North programme (Tuesday 12th January) that new catchment measures should be adopted upstream of Leeds to reduce flood risk.

Rivers systems in their natural state have their own flood control mechanisms. Moorland areas, especially "Blanket Bogs", act as natural sponges, absorbing and retaining large volumes of rainfall. Excessive winter river flows are accommodated by extensive floodplains. Unfortunately these natural processes have been compromised by relentless development in floodplains and the degradation of the natural moorland buffering by draining, burning and trampling etc.

In essence the Core Strategy has been overtaken by events, particularly the proposals for substantial development in the Wharfe and Aire valleys and in the Shipley / Bradford Canal Corridor. As mentioned, earlier developments within 7km of Ilkley / Rombalds Moors will lead to further degradation of the Blanket Bogs, reducing their natural water storage capability. The recent flooding has also demonstrated the total ineffectiveness of SUDS drainage systems in extreme rainfall events, particularly on sloping ground. These systems get completely overwhelmed leading to enhanced runoff from paved and surface areas. They also act as shallow dams to groundwater, diverting and accelerating flows.

ACS believes the Core Strategy provisions on flooding are now totally inadequate, particularly in the areas mentioned above, and should be put on hold pending the Environment Agency review of river catchments with respect to flooding. The likely outcome is a considerable reduction in land suitable for development which will then need to be reserved for future "local need". The modification in its current form is not effective and completely unsound.

10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification 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.

The plan, in particular the proposed development/housing allocations, should be put on hold and a full District-wide review undertaken of flooding and flood risk by the Environment Agency and relevant partners. Only after conducting such a review can a sustainable and realistic development strategy, in line with NPPF and other relevant policy guidance, be put forward.

Whilst this would result in a temporary hiatus, it is clear that there are extensive areas of brownfield land and derelict premises, particularly in Bradford West (as set out in representations from other Wharfedale groups) which are categorised by the Environment Agency as at minimal risk of flooding, and whose development would meet a stated aim of the plan to prioritise PDL; at the same time, there is sufficient land with current planning permission for residential development throughout the District which could proceed and which would therefore enable on-going housing needs to be met during the period required for the flooding review.

11.
Signature:



Date:

19th January 2016

Thank you for taking the time to complete this Representation Form.