

## Site Allocations (Homes & Jobs) Preferred Options Consultation: Strategic Flood Risk Sequential Test - Draft Jan/Feb 08 Responses

### Support

#### M1 - Applying the Flood Risk Sequential Test to sites – general comments

Respondents: 5

Reference	Name	Agent	Comment	Site	Option
0267_1259 / 25237	Lands Improvement	Barton Willmore Partnership	Land Improvements agree with the overall approach in applying the sequential test for all land allocated within a LDD		
0328_0758 / 25453	Environment Agency		The Agency is happy that the LPA carried out the FRST on the proposed sites for development.		
0328_0758 / 25454	Environment Agency		In agreement with the approach of the ranking of potential sites from the largest in the lowest risk areas to the smallest in the highest risk areas.		
0328_0758 / 26834	Environment Agency		The Agency is happy that the sequential test has been undertaken for proposed sites and the approach taken is supported.		
1162_1219 / 26233	Bilton Conservation Group		Support the concept of the flood risk sequential test.		

#### M2 - Flood Risk Sequential Test – site specific comments

Respondents: 2

Reference	Name	Agent	Comment	Site	Option
0229_1277 / 26382	Hallam Land Management Ltd	Andrew Martin Associates	The site is fully within FZ1. The risk of flooding is low and so the site can be developed for residential development.	H3	
1174_1231 / 26197	John Boddy Timber Ltd	Strutt And Parker	The assessment generally accords with the company's experience, which indicates that the vast majority of the site area is unaffected by flooding, with only the lower lying areas immediately adjacent to the river susceptible. The assessment of site potential suggests that housing would not be located in this latter area, and such an approach is supported.	B11(1)	

#### M3 - Flood risk exceptions test

Respondents: 1

Reference	Name	Agent	Comment	Site	Option
1162_1219 / 26235	Bilton Conservation Group		Support in principle the exceptions test and trust that when it is applied it will be exercised strictly.		

#### M4 - General comments

Respondents: 1

Reference	Name	Agent	Comment	Site	Option
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## Object

### M2 - Flood Risk Sequential Test – site specific comments

Respondents: 5

Reference	Name	Agent	Comment	Site	Option
0343_1150 / 25462	Keyland Developments Ltd	Sanderson Weatherall	The site is wholly acceptable in the context of this test. Comments made by the LPA in relation to sustainability are not accepted.	H105(1)	
0343_1150 / 25464	Keyland Developments Ltd	Sanderson Weatherall	The site is wholly acceptable in the context of this test. Comments made by the LPA in relation to sustainability are not accepted.	H105(1)	
0790_0811 / 25641	Knox Valley Residents Association		Concern expressed about the increased likelihood of flooding should the development of H3, H32, H104, H105(1), H1023, RL10089 and RL1015(1) go ahead. The increase in water levels and flooding attributable to earlier development in the catchment basin of the Oak Beck is well documented. Flood control measures must be put in place as part of any development allowed on these sites.		
0936_0975 / 25727	Mrs C Waddell		Object to the development of K2b as 10% of this land is in medium/high flood risk. Development here will increase flooding of the Eastfield Estate.	K2b	
1288_1360 / 25599	Mr and Mrs P Urukalo		The document underestimates the flooding potential of Frogmire Dyke.	K2b	

### M3 - Flood risk exceptions test

Respondents: 1

Reference	Name	Agent	Comment	Site	Option
1288_1360 / 25598	Mr and Mrs P Urukalo		The site can only be developed if it passes the exceptions test.	K2b	

### M4 - General comments

Respondents: 2

Reference	Name	Agent	Comment	Site	Option
0225_1581 / 25415	Persimmon Homes (Yorkshire) Ltd	Scott Wilson Ltd	In relation to Site H25, the sequential test assessment is not based on Flood Risk but matters totally unrelated such as poor access to jobs, shops and services by non-car modes and that the site is within a SLA. The site is totally within Flood Zone 1 and therefore sequentially preferable for development.	H25	
1288_1360 / 25600	Mr and Mrs P Urukalo		It would be criminal if the proposed development deemed the existing properties nearby uninsurable due to the subsequent flooding of Frogmire Dyke.	K2b	

## Comment

**M1 - Applying the Flood Risk Sequential Test to sites – general comments**

Respondents: 2

Reference	Name	Agent	Comment	Site	Option
0328_0758 / 26836	Environment Agency		It is important that for those sites that require the exception test that this is carried out BEFORE deciding whether these sites should be allocated. The Agency would wish to be consulted on such work.		
1540_1638 / 25649	Mr C T Knowles	Indigo Planning Ltd	The Council have failed to demonstrate that the sites in Flood Zone 1 that have not been carried forward as preferred options are 'not reasonably available' and that there are 'good planning reasons why development should not take place in these areas of the district'.		

**M2 - Flood Risk Sequential Test – site specific comments**

Respondents: 4

Reference	Name	Agent	Comment	Site	Option
0328_0758 / 26835	Environment Agency		Suggest that the LPA check the accuracy of the % flood zones against the comments as in some cases they don't match eg RL108a and RL1148.		
1174_1231 / 26198	John Boddy Timber Ltd	Strutt And Parker	The assessment indicates that the site must pass the exceptions test. The assessment highlights that the site provides the opportunity to redevelop an under used brownfield site with good access to jobs, shops and services. That summary accords with the company's view. Wider community benefits would result from improved riverside access, and the retention of the existing business and the local workforce on a small area of the site.	B11(1)	
1540_1638 / 25650	Mr C T Knowles	Indigo Planning Ltd	The site has been discounted for reasons other than flooding, it has not been made clear the relative weighting given to the issue of flood risk against the other issues.	R7	
1540_1638 / 25653	Mr C T Knowles	Indigo Planning Ltd	This site lies within Flood Zone 1 there are no constraints with bringing the site forward. The fact that the site is outside the development limit is not reason enough to preclude its development.	R7	

**M3 - Flood risk exceptions test**

Respondents: 2

Reference	Name	Agent	Comment	Site	Option
0267_1259 / 25239	Lands Improvement	Barton Willmore Partnership	3 out of the 7 preferred options in Ripon are within Flood Zone 2 and 3a, these sites therefore must pass the 'exceptions test'.		
1540_1638 / 25652	Mr C T Knowles	Indigo Planning Ltd	The identification of preferred options which require an exceptions test is premature and does not result in the identification of preferred options through the application of a sound evidence base.		

**M4 - General comments**

Respondents: 4

Reference	Name	Agent	Comment	Site	Option
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0267_1259 / 25238	Lands Improvement	Barton Willmore Partnership	The Council have identified that there are insufficient sites for the 15 year development plan period.
0328_0758 / 25455	Environment Agency		There are two inaccuracies that need to be checked. The % of area that are in Flood Zones of sites RL108a(1) and RL1148 don't fully match in the site assessments.
1162_1219 / 26236	Bilton Conservation Group		Would like to highlight the growing issue of flash flooding, caused by the increase in the number of impermeable surfaces.
1540_1638 / 25651	Mr C T Knowles	Indigo Planning Ltd	Greater transparency should be applied to this process to establish an agreed position in relation to the issue of flood risk.