

WATER QUALITY					
Ref	Name of respondee	Organisation	Comments	LCC Initial Response	Action
026	Andy Parnham	LCC Councillor (Farnley Ward)	Question 8 - Agree with grey water recycling.	Support welcomed	None
031	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<p>Preferred Policy Position - Water 1: Functional Flood Plan (Page 21) Support for Policy Position.</p> <p>Preferred Policy Position - Water 2: Development in Flood Risk Areas (Page 22) Support for Policy Position. Need to clarify whether this relates to all developments or all developments within flood risk areas (since the policy refers to development in flood risk areas).</p> <p>Preferred Policy Positions - Water 3, Water 4, Water 6 These preferred policy positions are supported.</p> <p>Preferred Policy Position - Water 7: Protection of Water Quality (Page 26) Support in general. However, Veolia would wish to understand the proposed 'defined zones' where more stringent criteria are to be applied before making further comment.</p>	<p>Support welcomed</p> <p>Clarify wording relates to development in flood risk areas</p> <p>Support welcomed</p> <p>Comments noted</p>	<p>Policy to be made more explicit</p> <p>Policy to be made more explicit</p>
036	Dr Kevin Grady	Leeds Civic Trust	<p>(Water 6) Two of the four suggestions included in this policy relate to the reduction of outflows – more emphasis should be placed on reducing consumption including the installation of water-saving devices within all buildings. There is also the issue of leaking pipes which are still a concern on a regular basis – are these counted in Leeds' higher per capita consumption?</p> <p>(Water 5) We feel that in order to complement the Flood Alleviation Scheme, policies to require the use of SUDS techniques should be strengthened – the policy should be extended to changes of use and conversions, with the adoption of policies to prevent paving over of gardens. It is acknowledged that this may need to be tied to national regulations but LCC should seek to introduce local directions in sensitive areas.</p>	<p>Covered in more detail in Sustainable Construction SPD</p> <p>The policy seeks to apply SUDS to change of use and conversions where possible – it will be necessary for applicants to demonstrate cases where</p>	<p>More information on the water hierarchy</p> <p>None</p>

				it is not possible. The policy requiring development not to increase surface water run off will also be applicable to policies for building hardstandings with impermeable surfaces, as these are no longer permitted development	
045	Rachel Wigginton	GOYH	<p>PPP Water policies. You need to consider whether these add to PPS25 and are thus necessary.</p> <p>Para. 4.27: All the saved water resource policies should be replaced in this DPD, if they are still appropriate or otherwise deleted.</p>	<p>Policies deal with the specific circumstances in Leeds</p> <p>Agree</p>	Further work required to assess the UDP Saved Policies
046	Angela Flowers	North Yorkshire County Council	<p>Flood Risk - The policy position with regard to flood risk reflects PPS25. It is suggested that water compatible development such as marinas, docks and wharves can be incompatible with the objectives of the Water Framework Directive. Development in areas of flood risk may have regard to Surface Water Management Plans, which are likely to be prepared by relevant authorities when the Flood &amp; Water Management Bill 2009 is enacted as well as wider climate change adaptations discussed in the Yorkshire &amp; Humber Climate Change Adaptation Study (2009) which contains a specific section for Leeds City Council.</p> <p>Water quality - Policy position reflects protection of sensitive water bodies, however objectives of the Water Framework Directive mean <u>all</u> water bodies should seek to attain good status and plans should not result in deterioration.</p>	<p>Comments noted</p> <p>Further work to identify and address potential conflicts</p>	<p>Check Policy against the Yorkshire &amp; Humber Climate Change Adaptation Study (2009)</p> <p>Research on water quality and evaluation to determine if there is a further policy needed</p>
053	Martyn Coy	British Waterways	<p>Paragraph 4.25 – Water Quality</p> <p>British Waterway’s welcomes that the DPD acknowledges the need to protect water quality of sensitive water bodies. We note reference to the Leeds &amp; Liverpool canal.</p>	Support welcomed	None

055	Colin Holm	Natural England	<p>Natural England supports 'Preferred Policy Position – Water 6: Water Efficiency'. Support but would prefer to see a minimum standard for water efficiency stated within the policy, such as certain point score / consumption category aligned with the Code for Sustainable Homes (see: <a href="http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf">http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf</a> ).</p> <p>Support 'Preferred Policy position – Water 7: Protection of Water Quality'.</p>	<p>Agree, Core Strategy includes policy for new buildings to meet the Code for Sustainable Homes which includes water efficiency. Sustainable construction SPD also contains policies</p> <p>Support welcomed</p>	Improve links between LDF documents
058	Mary Keynes	Impact Residents Network	<p>Domestic water saving devices such as double flush toilets should be affordable and available to households; domestic water metering should be available on a voluntary basis with a pay structure that rewards economical users.</p> <p>Measures to reduce flood risk should be strictly adhered to and regularly monitored and enforced. This is essential in view of recent flooding which has occurred as a result of climate change.</p>	<p>Core Strategy includes policy for new buildings to meet the Code for Sustainable Homes which includes water efficiency. Sustainable construction SPD also contains policies</p> <p>Covered in proposed water policies</p>	None
061	Stuart Beardwell	Leeds Friends of the Earth	<p>8) Green roofs, more green space within developments (ie. less concreted/tarmaced areas).</p> <p>9) These approaches do not go far enough in addressing land use issues in the upper Aire Valley, the Flood Alleviation Scheme should be seen as a long-term process of engagement with the stakeholders of the catchment area, not a one off concrete-pouring exercise. Infrastructure alone will not solve the flooding problem.</p>	<p>Green roofs are being pursued in the Core Strategy</p> <p>The Environment Agency's Catchment Flood Management Plan is the correct vehicle for addressing this. Land use issues upstream of the Leeds District cannot be addressed in our LDF.</p>	<p>None</p> <p>None</p>
065	Mr. Zulfiqar Ali	Environment Agency Y&H	<p>Water Resources - Water Resources section has focused on flood risk and managing flooding but very little reference to other aspects of water resources. Water resources covers all sources of water that are potentially useful to humans. This includes agriculture, household, recreation and environmental activities.</p> <p>Need to deal with water availability and its link with water dependent industry within Leeds. Water availability from both surface water and groundwater sources must be considered when looking at any new water dependent</p>	<p>Agree</p> <p>Agree but within the powers of the LDF planning and development</p>	Be explicit over what Leeds can and cannot control relating to the water cycle

		<p>development as part of the preliminary viability study. This information is particularly important given the commitment to renewable sources of energy which is referred to later on in the Natural Resources and Waste Development Plan Document (NRWDPD). It is important to note that, at least three of these renewable source methods are water dependent and therefore an assessment of water availability status throughout Leeds is critical if they are to be successful.</p> <p>Providing there is no pollution, we will encourage the augmentation of groundwater resources through techniques such as SUDS and artificial recharge, particularly where resources are scarce, or where such activities would reduce the flood risk from development.</p> <p>Agree that 'water is not a scarce resource in the Leeds area' however the NRWDPD aims to ensure efficient use of natural resources.</p> <p>Water Efficiency - The Plan recognises that overall water consumption in Leeds is 36% higher than national average. However, it is not clear whether these figures are based on full potable water use for the Leeds area or just on household consumption these figures need to be substantiated. We would also like to see a commitment made towards reducing water consumption across Leeds to fall in line with or below national average.</p> <p>The systems to improve overall water efficiency in new developments are all based around grey and waste water. The use of water efficient fixtures and fittings such as low-flush toilets and sensor taps is not covered.</p> <p>Water Quality - Water 7: Protection of Water Quality Need to define the criteria for defining water sensitive waterbodies.</p>	<p>control system.</p> <p>Whilst the use of SuDS (particularly percolation methods) can help to recharge groundwater - as well as mitigating flood risk, sites that have a history of contamination would not be suitable for these methods, due to the risk of transferring these contaminants to the groundwater. Agree</p> <p>Core Strategy includes a policy for new buildings to meet the Code for Sustainable Homes which includes water efficiency. Sustainable construction SPD also contains relevant guidance.</p> <p>Define criteria.</p>	<p>Add sentence to text to clarify that whilst water is not scarce in Leeds we would still want to ensure it is used efficiently.</p> <p>Improve links with Core Strategy.</p>
--	--	--	--	--

			<p>WFD relates to all water bodies not just sensitive water bodies. A further aim is to comply with water related standards and objectives for environmentally protected areas established under EU legislation which may require meeting more stringent standards in some areas.</p> <p>Prefer to see greater emphasis on new developments not to cause deterioration and the continued protection of water quality for all surface and groundwater's.</p> <p>Flood Risk - We support the policies suggested for dealing with flood risk. We very much welcome the policies dealing with surface water run-off.</p> <p>Policy Position Appendix - Figure 1 Please note that this has now been updated by your Land Drainage Department and therefore should be updated accordingly.</p> <p>We suggest that para 4.2 be amended to show flood zone 3 divided into 3ai and 3aia to be in line with the Strategic Flood Risk Assessment. This would then clearly indicate 4 flood zones but with 3a divided.</p> <p>Para 4.8 expand last sentence to say that if there are known flooding issues an FRA may even be asked for in flood zone 1 (such as where surface water flooding is an issue).</p> <p>Contaminated Land Support and offer to help develop policy further with regard to impact on water quality. Where water resources are particularly sensitive we expect the planning authority to apply conditions that will ensure that water quality is protected and improved.</p>	<p>Consider if need further policy for environmentally protected areas.</p> <p>Should be addressed by National Policy, not just a Leeds issue.</p> <p>Support welcomed</p> <p>Agree</p> <p>Agree</p> <p>Agree – add sentence.</p> <p>Support and offer welcomed.</p>	<p>Update Appendix Figure 1</p> <p>Amend para 4.2 to include sub-delineation into zones 3ai and 3aia.</p> <p>Add sentence.</p> <p>Meet with EA to explore Policy development.</p>
075	Nicola Bell of Scott Wilson (agent)	PPL Revera	<p>Support for all the water resources policies.</p> <p>The Cock Beck also presents an opportunity to assist with flood alleviation schemes in the east of Leeds to reduce the risk of flooding downstream. The areas adjacent to the Cock Beck could be de-silted to restore lakes within the estate which would be wet at all times but have the potential to store substantial amounts of additional water in peak flow events to alleviate flood risk.</p>	<p>Support welcomed.</p> <p>Land drainage team consulted and welcome suggestion.</p>	<p>Add to Water 5 Surface Water Run Off, 'wherever appropriate, developers will be encouraged to create additional water storage opportunities in order to mitigate downstream flooding'.</p>
080	Dan Walker, David L	David Atkinson, Lafarge	<p>Q9: Disagree with policy, the careful design of schemes can be used to mitigate the efforts of flood risk and enhance flood attenuation benefits.</p>	<p>A clear policy is needed to ensure that this happens</p>	<p>None</p>

	Walker Ltd.(agent)	Aggregates Ltd		and so that developers know early on what is expected of them.	
082	David Blackburn	LCC Councillor (Farnley Ward)	Question 8 - Agree with grey water recycling. Need to make sure that planners take this into account in planning application.	Support welcomed	None
085	Ann Blackburn	LCC Councillor (Farnley Ward)	Question 8 - Agree with grey water recycling. Need to make sure that planners take this into account in planning application.	Support welcomed	None
086	Lionel Sykes		Q8: flooding in Leeds is caused by neglect and very poor upkeep of drainage system, as blocked drains lead to flooding. Yorkshire Water could help by repairing leaks once notified in days instead of months.  Q9: There should be no development where there is the slightest chance of flooding or flood risk.	LCC Flood Risk Section has advised that actions are in place to address this issue. However, even if the infrastructure is in perfect working order it will not be able to cope during extreme rainfall events.  This would mean abandoning parts of our City Centre and out-lying settlements on the River Wharfe – which is not desirable and not government policy.	None
091	FM Lister (Trustees)	Henry Hudson (deceased) estate	Q8: Support for measures to reduce demand for treated water.  Q9: Areas on published maps are wildly inaccurate. Need further investigation.	Support welcomed. SFRA is approved by the EA as accurate.	None