

This response is submitted on behalf of the Ouse and Derwent and the Ainsty Internal Drainage Board who each has a significant catchment within the Selby District. It should be noted that other internal drainage boards also cover areas of Selby. In light of the level of geographic coverage the Boards would wish to emphasise that any responses are strictly related the specific areas covered by each Board.

Question 1

The Board would have no objection to the objectives and approach and would generally support the approach adopted.

Question 2

The Board would have no comment.

Question 3

The Board are supportive of this approach in line with the approach to Localism

Question 4

The Board would have no comment

Question 5

Again the Board would support the aims and objectives and would wish to emphasise the strategic correlation between site specific requirements and climate change which will have an ever increasing emphasis for the settlements and assets within the lower catchment of the Selby District.

Question 6a

The topic areas listed would appear to have a high degree of relevance within the context of this process especially when viewed in the broadest sense and linked strategically.

Question 6b

Yes

Question 6c

The degree of relevance in terms of this question is judged purely on the basis of the strategic importance within the organisation represented. In this case T3, T4 and T5 would have a higher degree of relevance. T2 would have least relevance to the core role of the organisation.

Question 7a

The Board would have no comment to make in regard to this approach.

Question 7b

The Boards would have no comment to make in this regard. It may be noted that the Board have no specific objections to the development of any land or the level of development within a specific site

or general area. An approach would be adopted whereby each application is judged on its merits and consequences especially in regard to drainage and flood risk in a site specific context and not based on location, nature, design and mass.

Question 8a

The Boards would have no comment

Question 8b

The Boards would have no comment

Question 8c

The Boards would have no comment

Question 9a

The Boards would have no comment

Question 9b

It is apparent that the infrastructure in some of the DSVs varies significantly and may potentially have an impact on the viability of certain projects/development. In some cases engineering solutions may be plausible to address the infrastructure issue although the issue of costs may be prohibitive. In other cases engineering solutions may not be practical. Other considerations such as riparian rights and land ownership also have the potential to hinder aspirational development.

Technical solutions to issues such as surface water drainage can often be developed within specific sites resulting in a neutral or even beneficial outcome. It would be important that the current methods of addressing such issues are sustained however, this would not necessarily take account of issues such as climate change which will inevitably have an impact on the longer term sustainability of some DSVs.

Technical solutions to such infrastructure issues may be complex, litigious and time consuming. Escrick, North Duffield, Hemingbrough and Cawood would all be defined as being restricted in terms of infrastructure either in terms of the capacity of the individual drainage channels or, where appropriate, pumping stations.

Whilst climate change may impact on certain DSV's and the associated infrastructure the issue of creeping development might also be an issue for consideration under householder application and permitted development rights. It is often more difficult to regulate these issues than it is new development with most schemes resulting in additional surface water run-off and increased pressure on already overburdened infrastructure with the obvious consequences that the risk of flooding increases. The introduction of measures and policies specifically designed to address such issues could impact hugely on the sustainability of DSV's. To this end the introduction of further guidance, policy or restriction with these areas may be worthy of exploration to ensure sustainability.

Question 10

In responding to this question the Boards must remain mindful of their core function and focus. The Board have a remit to maintain, sustain and, where possible, improve the drainage infrastructure with a view to maintaining manageable water levels throughout the catchment. As a general principle the Boards would be neutral to the nature of development beyond that remit, hence this question could only be answered from that singular stance.

As virtually all infrastructure in the district is under pressure and that pressure will increase through development and climate change the Board would only judge any proposal based on the issue of surface water drainage and potential flood risk. As the area is generally flat and low lying with a strong reliance on discharge to a tidal river system the Boards would contend that this issue has a high degree of importance.

Question 11

The Board would have no comment to make.

Question 12

The Board have no such knowledge.

Question 13a

Yes

Question 13b

In supporting the principle established at point 2d the Board would have reservations in regard to the introduction of any such site or pitches immediately adjacent to open watercourses that constitute critical drainage infrastructure. Issues of access and the increased likelihood of blockage and flood along with the issue of the depositing of toxic and semi-toxic arisings are not necessarily conducive with such residential occupation.

Question 14

The Boards would support a more detailed approach to this policy element which would afford a level of appropriate scrutiny of the relevant factors.

Question 14b

The Boards would wish to suggest an FRA or water management plan could be used as a mechanism where there may be impact on surface water drainage infrastructure.

Question 15a

The Boards would not seek to comment.

Question 15b

The Boards would not seek to comment

Question 16

The Boards would not seek to comment

Question 17

The Boards would only wish to reiterate points made in respect of other types of development and flood risk management.

Question 18

The Boards would not seek to comment

Question 19

The Boards would not seek to comment

Question 20

As these areas are only partially within the Board's areas and are centred on other areas it would not be for the Board to make comment. However the Board would refer to comments within later sections of this consultation

Question 21

The Boards would suggest that the issues with which they will be primarily concerned will in the main be dealt with via a number of mechanisms linked to flood risk management and sustainability under national guidance and the SFRA. With or without safeguards the Boards feel they would be able to achieve that function. Therefore the outcome of question 21 may be determined by general consensus.

Question 21a

N/a

Question 22

The Boards would prefer to see settlements limits maintained.

Question 23a

This is an area beyond the catchment of the Boards.

Question 23b

Yes

Question 24

The Boards would not seek to comment

Question 25

Accepting that provision and reference has been made to Board related concerns within this consultation and the hierarchy of provision provides further guidance and policy the Boards would seek further provision under question 25.

Question 26a

No

Question 26b

No

Question 26c

No

Question 26d

No

Question 26e

No

Question 26f

The Boards would wish to see more detailed policy in regard to climate change issues with this being linked to the issue of uncontrolled creeping development, permitted development rights and householder applications. The situation is presently anomalous in that in a low lying and flat area with a propensity for flooding planning policy can address a range of relevant issues in the interests of true sustainability but this is constantly undermined through unregulated and uncontrollable development.

Question 27a

The Boards would suggest that open watercourses would be worthy of consideration for inclusion within this policy context. The Selby District has an abundance of such features which often form the critical drainage infrastructure for an individual settlement or settlements. Over time there has been a preference or willingness to pipe in watercourses resulting in the loss of huge volumes of flood storage and inhibiting bio-diversity. This cannot continue.

Similarly there is a need to protect watercourses in terms of access. Where there is a desire to give access to the countryside this needs to be mitigated against the need to maintain the watercourses and sustain their drainage function. Issues such as disabled access, landscaping, surfacing and definitive rights of way can all impact on the functionality of watercourses and their broad value to the communities they serve.

Question 27b

While the Boards would not be critical a broader and more bespoke policy base, relevant to watercourses would be beneficial.

Question 28

Yes

Question 29

The Board would not seek to comment

Question 30a

The Board would not seek to comment

Question 30b

The Board would refer to previous comments made.

Question 30c

The B would refer to previous comments made.

Question 31

The Boards would not seek to comment

Question 32

The Board would recognise the need to address issues around capacity

Question 33a

Yes

Question 33b

Yes

Question 34a

Yes

Question 34b

The Boards would not seek to comment

Question 34c

This would not be an issue the Boards would seek to comment upon beyond the site specific nature of any application.

Question 35

The Boards would refer to earlier answers but would wish to see specific policy content in regard to the protection of open watercourses.

Question 36

The Boards would not seek to comment

Question 37a

The Boards would advocate a review of ENV12 and seek a more strategic link between this, householder policy and PD rights in identified areas.

Question 37b

The Boards would not seek to comment on the broader context of policy

Question 37c

The Boards would not seek to comment on the broader context of policy

Question 38

The Boards would not seek to comment

Question 39

The level and nature of development within this area will be determined through a range of policies and decisions. However, there are issues in respect of the drainage infrastructure and the impact climate change will have over a period of years. Any development would be reliant on the need to prove no detrimental impact to this community or communities downstream.

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climate change will have over a period of years. Any development would be reliant on the need to prove no detrimental impact to this community or communities downstream.

Yes

Landscaping

