

Core Strategy Partial Review
Preferred Options - July 2019
Representation Form – Part B

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)

1. Please state which document you wish to comment on:-

Core Strategy PR Preferred Options	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input type="checkbox"/>
Habitats Regulations Assessment	<input type="checkbox"/>	Equality Impact Assessment	<input type="checkbox"/>
Health Impact Assessment	<input type="checkbox"/>	Evidence Base <i>(please state which document below)</i>	<input type="checkbox"/>
<input type="text"/>			

2. Please state which part of the document your comments relates to:-

Policy	<input type="text" value="EN8"/>	Page Number	<input type="text" value="194"/>	Paragraph	<input type="text" value="Q.40"/>
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3. Do you wish to:-

Support	<input checked="" type="checkbox"/>	Object	<input type="checkbox"/>	Comment	<input checked="" type="checkbox"/>
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4. Please provide your comments and/or any suggested changes in the box below.

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

(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 the consultation document).

AEG welcomes and supports the strengthening of the Water Environment section (D) of the policy.

We welcome the inclusion of the requirement to ensure no deterioration of water courses or bodies occurs as the result of development. However, we consider this should go further and support restoration of water courses and bodies that have been degraded.

The more explicit guidance on circumstances in which proposals for development will be supported is welcome.

We support the criteria set out on p201, however the adverse impacts of abstraction on eco-systems is not addressed, and we suggest an additional clause:

“per capita consumption of water and reduction of leaks in pipework should be encouraged to minimise water abstraction from rivers to maintain downstream environmental flows”

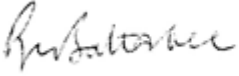
The Water Environment section of the policy does not address the poor performance of many Waste Water Treatment Plants (WWTP) that are frequently overwhelmed in wet weather. The discharge of untreated sewage into the Wharfe at Ilkley, for example, causes serious local pollution and introduces faecal bacteria into the river in



high concentrations likely to cause health problems for members of the public using the river for recreation. Ref: The Ilkley Clean River Campaign.

Although such discharges are often permitted by the Environment Agency, it is clear, that the permits need revision especially as they do not take account of increased rainfall and the increasing frequency and intensity of storm events occurring under climate change.

In this respect the Council should ensure that Yorkshire Water's WWTPs and associated Combined Sewer Outflows (CSOs) conform to the requirements of the Urban Waste Water Treatment Directive that allows spills only after extreme rainfall events.

Signature: 	Date: 23/09/2019
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Thank you for taking the time to complete this Representation Form.