SCOPING CONSULTATION RESPONSE FORM

Please detach this form and use as a guide to provide your response to the Scoping Consultation Report. You are also welcome to provide additional comments and/or information as part of your response.

Written responses should be received by **INSERT DATE** Please send to:

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Name Of Organisation responding:

KIRKSTALL VALLEY PARK

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Preferred Option

Q1. Do you have any comments on the preferred option and alignments?

Occasional flooding causes only minor damage and inconvenience in Kirkstall. We do not need extensive flood defence works to “protect” the valley. We prefer to live with flooding and leave things largely as they are. We doubt that the measures proposed for the railway near Bridge Road will be effective because of high ground permeability, while the other measures seem likely to result in more intensive built development throughout the protected area, with adverse environmental effects.

We have only just received (12 September 2008) details of the Leeds flood model, which has necessarily been studied at considerable speed. On first reading it seems that the agency has not fully considered an obvious and attractive option, which is to exploit all available flood storage reservoirs throughout the catchment, including small reservoirs, to delay and attenuate the main storm peak. Preliminary calculations suggest that there is sufficient storage volume **in total** to contain the required run-off, even though each individual reservoir is far too small to hold the entire peak, and on its own would make a negligible difference to the outcome.

Flood storage using multiple small reservoirs on tributaries and the main river would avoid the problem caused by tributaries joining the river below the principal storage washlands in the upper Aire valley. We ask that this “low tech” minimalist solution should be further investigated. It would be highly resilient, having no single point of failure, and would probably have a lower overall construction cost than the “big bang” option presently favoured. It could be implemented piecemeal using local labour over an extended period, and would bring environmental benefits and habitat enhancement throughout the entire catchment.

Human Beings

Q2. Are there other potential impacts to human beings that we should be including in the assessment?

Loss of attractive riverside habitat is important for human beings as well as for local wildlife, because developers will exploit the presence of flood defences to build at high densities right up to the edge of the protected area. Land owners will inevitably argue that substantial investment in flood defences requires all the defended land to be intensively used. The resulting loss of urban recreational land and leisure opportunities will have adverse effects on human health and well being.

Q3. Are there any additional data sources which we should be using in support of the assessment?

Attempt to quantify the benefits to human health and happiness from open, public recreational land near the river, and estimate local positive and negative changes in public access resulting from the flood alleviation scheme. Combine these figures with the construction costs and any proven economic benefits from "improved" flood defences in order to derive an overall cost – benefit assessment.

Q4. Are you satisfied with the information taken into consideration in section 3.1?

No, this information is seriously deficient and misleading.

The economic effects of flooding in central Leeds have been greatly exaggerated. Relatively small parts of the main urban area are at significant risk of flooding from the River Aire. Much of Leeds flooding is from becks and streams that are not part of the flood alleviation scheme. In many cases local solutions are available that would mitigate the effects of flooding without requiring huge capital expenditure. Despite the inconvenience and potentially catastrophic effects on individuals, the long term economic effects of river flooding upon Leeds are likely to be small.

The figure of 2000 houses should distinguish between dwellings that are likely to suffer direct flood damage, and those where access would be briefly restricted.

Restrictions on public rights of way and tourism should estimate how many days in total are likely to be lost to flooding at each location over the 200 year period, and the likely clean up costs. We suspect that some of these will be trivial, and possibly amenable to simple, low cost local mitigation. We also suspect that there are large local variations in risk. (For example, Armley Mills museum has both a high level and a low level access route.) It is misleading to lump all the sites together.

There would be significant economic, social and public health benefits from the "do as little as possible" option which have not yet been quantified. An orderly, planned retreat from high risk areas could leave significant tracts of public open space along the riverside. This would create a less oppressive and crowded urban environment, and increase the overall attractiveness of Leeds to investors and employers. Improved recreational opportunities would make people happier and healthier, and would increase property values in areas adjacent to the new open spaces. It is possible to quantify these effects and this should be attempted.

Q5. Do you have any further information relevant to this section we may find useful?

http://www.rics.org/RICSWEB/getpage.aspx?p=y3MdjLT4wUqvLEURf8JKew

http://www.openspace.eca.ac.uk/pdf/HealthWellbeing.pdf

Land Use

Q6. Are you aware of any proposed land management initiatives?

Kirkstall Valley Park is a registered charity which aims to establish a new inner city public park in the Kirkstall Valley (see http://kvp.org.uk/). This includes footbridge access between St Ann's Mills and the Kirkstall Valley Nature Reserve and a white water canoe training course near St Ann's Mills. There is a related, complementary proposal from Kirkstall Valley Community Association to establish a community interest company under the government's Quirk Initiative to restore and manage St Ann's Mills for mixed uses, including canoe storage and canoe development with Leeds Canoe Club, an artisan workshop and a new visitor centre for the Kirkstall Valley Nature Reserve with the Yorkshire Wildlife Trust.

Leeds City Council is apparently talking to developers about intensive residential or office development at St Ann's Mills, but refuses to discuss this with the public or the local councillors. The council is primarily seeking to maximise its capital receipt and is reluctant to disclose its developer contacts. We have not so far persuaded the council to prepare an Environmental Assessment or a Planning Brief.

Q7. Are you satisfied with the information taken into consideration in section 3.2?

No. We believe the proposed Leeds flood alleviation scheme will have significant, unintended and largely negative effects on land use, by increasing residential development pressure on open land adjacent to the River Aire.

Q8. Do you have any further information relevant to this section we may find useful?

See http://www.kirkstallmills.net for a dissenting view of Leeds City Council plans.

Flora and Fauna

Q9. Are you aware of any species or habitats having been affected by flooding or flood management in the study area, adverse or beneficial?

Occasional flooding has been greatly beneficial in the Kirkstall Valley. By driving built development away from the river banks, flooding has protected both the river and the riverside environment. The Leeds flood alleviation scheme is putting this considerable benefit at risk.

Q10. Are you aware of any other relevant sites awaiting designation?

There is about 25 acres of MAFF-certified grade one agricultural land at the Burley Mills allotments which is subject to occasional flooding. This valuable resource has not been well managed by Leeds City Council. In 1989 the council considered the allotments were a suitable repository for contaminated fly ash, in order to convert them into a supermarket car park. In addition to the cultivated areas, there are fertile meadows, dense scrub vegetation and extensive tree cover which collectively support a considerable variety of mammals and birds. This luxurious vegetation is complementary and immediately adjacent to the much less-favoured habitats on the Kirkstall Nature Reserve. Kirkstall Valley Park and Yorkshire Wildlife Trust are interested in the long term sustainable management of the allotments, both for food production and as an inner-city educational resource.

Q11. Are you aware of any proposals to restore floodplain or water dependant habitats in the study area?

Kirkstall Valley Park would be delighted if the entire natural floodplain continued to function as such, and would like to see the orderly removal of artificial flood bunds and other needless “flood protection” from this area.

More could be done to protect and enhance the goitside environment (as distinct from the main river) by removing alien species, increasing water flows, and refitting the penstocks at Burley Mills that were needlessly destroyed by Leeds City Council during previous “improvement” works.

Q12. Are you satisfied with the information taken into consideration in section 3.3?

There is very little consideration of invertebrate species or microbiology, although these are important elements in the food chain / nutrient cycles that are known to be affected by the flood regime.

Q13. Do you have any further information relevant to this section we may find useful?

We often see kingfishers in the Kirkstall Valley.

The Armley / Kirkstall river island was envisaged as an undisturbed breeding area when the Nature Reserve was planned. Trail bike riders have trespassed across the ford to the river island, where motorcycles have caused significant damage. The ford cannot be altered or removed because it is grade 2 listed and functions in flow control, but stronger byelaws and a steel barrier might help to control access.

Air, Noise and Climate

Q14. Are you satisfied with the information taken into consideration in section 3.4?

No. If the flood alleviation scheme allows more built development adjacent to the river, as it might easily do at St Ann’s Mills, then the increased noise and human disturbance outside normal working hours from the proposed residential use could have adverse impact on the local bat and otter populations. This should be assessed and taken into account.

Q15. Do you have any further information relevant to this section we may find useful?

Landscape and Visual Amenity

Q16. Are you satisfied with the information taken into consideration in section 3.5?

No. Character zone 2 (Bridge Road to Viaduct Road) includes much of the area for the proposed Kirkstall Valley Park. This has a much finer grain and greater internal variety than your report presently acknowledges.

Q17. Do you have any further information relevant to this section we may find useful?

Yes. Please see http://kvp.org.uk/ and follow the link to “Feasibility”. The Kirkstall Valley is specifically identified by policy N11 in the Leeds Unitary Development Plan as an area where the council will resist further built development. There should therefore be little need for additional flood protection works in Kirkstall.

Historic Environment
Q18. Are you aware of any other historic sites that are vulnerable to the effects of flooding or flood management activities within the study area? St Ann's Mills is at serious risk of significant damage to an important historic site. A water mill was operational by 1770 and the site has been continuously occupied to the present day. The buildings are not listed, but a new listing application has been prepared. The weir at St Ann's Mills is not shown on the 1851 Ordnance Survey map, although it appears on several earlier maps and certainly existed by this date. Proper operation of the extensive network of mill goits is critically dependent on the presence of this weir. The area is of interest to industrial archaeologists because it shows the parallel development of both steam and water power on the same site over many years.
Q19. Are you satisfied with the information taken into consideration in section 3.6? No. The County Archives at Northampton hold extensive documentary records of the Earl of Cardigan's Estates in Leeds, including St Ann's Mills, but so far there has been little attempt to correlate these documentary records with the physical remains in Kirkstall, or with the insurance records which are an important source of financial information about the textile industries. Flood alleviation works could cause extensive damage to St Ann's Mills before these important correlations between physical and written records have been attempted. A soil survey using ground penetrating radar should be use to locate industrial archaeological remains before designing and constructing any new flood defences at St Ann's Mills
Q20. Do you have any further information relevant to this section that we may find useful? See: http://www.northamptonshire.gov.uk/Community/record/about_us.htm We will try to search these archives over the next twelve months for records relating to St Ann's Mills, and report any significant information to the Environment Agency. There is an historic flood bund on the Armley / Kirkstall river island which you do not mention, or show on your published maps. It seems to have been associated with St Ann's Mill weir. We assume that this bund predates the artificial creation of the river island by the construction of the western bypass channel and the ford.
Water
Q21. Are you aware of any other water management initiatives in the study area? Kirkstall Valley Park and Leeds Canoe Club hope to develop an inner-city white water canoe training course at St Ann's Mills, and the British Canoe Union has identified the Leeds – Gargrave link as a potential tourist route.
Q22. Are you satisfied with the information taken into consideration in section 3.7? No. Our preference for wetland development throughout the upper Aire catchment to reduce flooding risk in central Leeds would probably result in reduced biological oxygen demand and improved water quality as an additional bonus. This potential improvement should be professionally assessed, in order to accurately compare the costs and benefits of the various flood alleviation options.
Q23. Do you have any further information relevant to this section that we may find useful?

Traffic and Transport
Q24. Are there any additional data and information sources which we should be using? Leeds flood alleviation scheme could interact significantly with the A65 quality bus initiative. There is an opportunity to significantly enhance the area between the A65 and the mill goits through Kirkstall, which will be affected by compulsory purchase orders and land swaps. It is important that the two design teams talk to one another and that the local environment in Kirkstall is not allowed “to fall between two stools”.
Q25. Are there any particularly traffic sensitive areas which could be affected by the scheme and require particular attention? Bridge Road in Kirkstall is an important river crossing. Flooding here would cause considerable congestion. This possibility should be carefully examined in computer models, although we doubt that this area will flood in the foreseeable future.
Q26. Are you satisfied with the information taken into consideration in section 3.8? No. This section overestimates the traffic disruption caused by flooding. Kirkstall Road flooded in 1866, and the flood line is recorded on buildings, but folk memory and local residents do not recall any more recent floods. The railway line at Bridge Road rarely flooded before the track was lowered for electrification. Recent floods only covered the rails to a shallow depth, and they remained clearly visible on photographs. Train drivers have suggested that it was possible for trains to proceed cautiously through most recent floods while still adhering to rail safety regulations, so there was no need for a break in service.
Q27. Do you have any further information relevant to this section that we may find useful? We have dated photographs of several recent floods in Kirkstall, although this probably duplicates information that the agency already holds.

Soil, Geology and Hydrology
Q28. Are you aware of any particular areas within the Leeds FAS scheme which may be contaminated other than those outlined above? We do not believe that there is any significant contamination in zone 3A which is almost entirely grade one agricultural land that has never to our knowledge been used for landfill, but we agree that there is surface contamination in zone 2D at the west end of St Ann’s Mills. This area was leased until the 1990s by a skip hire company. The area between Burley Mill goit and the A65 “Dobbie Row” is a former municipal waste tip which has partially regenerated after it was closed. It is just outside but immediately adjacent to zone 3A. The former CEGB ash lagoons in Armley are heavily contaminated with highly acidic coal weathering products (under the golf course) and also with fly ash, under the nature reserve. We assume that the acid is mostly sulphuric acid from sulphide oxidation.
Q29. Are you satisfied with the information taken into consideration in section 3.9? The former CEGB ash lagoons are made ground which is now several metres above the river. This land is incorrectly marked as floodplain in the Leeds Strategic Flood Risk Assessment, but is correctly identified in your own assessment.

Q30. Do you have any further information relevant to this section that we may find useful?

Between 1987 and 1993 Leeds City Council commissioned ground investigation works by Norwest Holst on the fly ash lagoons and Dobbie Row. Records of these drill cores may still be held somewhere within the Development Department, but failing this we might be able to locate a copy.

There is an ADAS report from March 1989 on the grade one agricultural land on the Burley Mills Allotments.

Planning, Legislative and Regulatory Requirements

Q31. Are you aware of any other studies, policies or plans that may be relevant to the Leeds FAS?

There is a 2008 feasibility study prepared by the School of Architecture, Landscape and Design at Leeds Metropolitan University on the proposed Kirkstall Valley Park, which can be downloaded from our website at http://kvp.org.uk/ by following the link to “Feasibility”.

Policy N11 saved from the Leeds UDP is also relevant.

Q32. Are you aware of any significant developments (recreational, residential, commercial or industrial) planned in the study area?

Yes. We aim to develop a new inner-city Public Park in the Kirkstall Valley with a canoeing and visitor centre at St Ann’s Mills, in partnership with Leeds Canoe Club and the Yorkshire Wildlife Trust.

Q33. Are you satisfied with the information taken into consideration in section 3.10?

We think you should include the proposed Kirkstall Valley Park, and specifically our plans for a canoe course and visitor centre.

Q34. Do you have any further information relevant to this section that we may find useful?

Please see http://www.kirkstallmills.net for a detailed critique of Leeds City Council policies.

Consultation

Q35. Are there any other consultees who should be consulted (see list in Appendix 2)?

Kirkstall Valley Community Association

Leeds Friends of the Earth

Q36. Do you wish to remain on the list of consultees for the Leeds FAS?

Yes

Opportunities
Q37. Are you aware of any other potential opportunities currently being planned, relevant to the Leeds FAS? Kirkstall Valley Park – please see our website at http://kvp.org.uk/ and our response to questions 31, 32 & 33
Q38. Could you suggest any additional opportunities or provide any further information we may find useful when considering opportunities?
Additional Comments / Information
We are trying to resolve an issue about the Armley fly ash lagoons, which were correctly identified by Atkins as made ground, but seem to have crept back into Leeds Strategic Flood Risk Assessment as functional flood plain. This land forms the golf course and the Kirkstall Valley Nature Reserve, and is now several metres above the river. It is unlikely to function as a flood storage area. Helen Miller at Leeds City Council has a map "5029546/DB/63/80" produced by Atkins which correctly identifies the various levels. What concerns us is the process that got from Atkins map to the Leeds SFRA, because if there are errors in the Kirkstall Valley, there may be similar errors elsewhere in Leeds. We are very grateful for the information that Stacey Riley has sent us from the Environment Agency, but this does not include many maps. I would be really useful have more maps, and I believe that quite a number were produced by Atkins after 2004 which could greatly clarify the assessment process. Leeds City Council have been reluctant to release those maps that they do hold, because these are either Atkins or Environment Agency data, and it is better that the original data owner keeps a grip on the information that is being circulated. In addition to the maps of the Leeds urban area, it would also be useful to have the upper Aire catchment maps prepared by Atkins since 2004 that are mentioned in Stacey Riley's letter [RFI/2008/6286] dated 9 September 2008. A significant body of opinion favours more work on the catchment, and less in Leeds city centre, and we really do need better catchment maps for this option to be properly discussed and evaluated.

Thank you for taking the time to provide us with your comments.