**BRADFORD CITY CENTRE ACTION AREA PLAN AND SHIPLEY AND CANAL ROAD CORRIDOR ACTION PLAN**

**INSPECTOR’S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT THE EXAMINATION HEARINGS**

**VERSION 1**

The Hearings Programme may be updated. Please ensure that you check the latest position if you wish to attend a particular hearing by contacting the Programme Officer or viewing it on the website at www.bradford.gov.uk.

Please remind yourself of the guidance concerning the format of the hearing at this Examination, contained in the Inspector’s Guidance Note.

*The two documents were submitted for examination at the same time. Accordingly, where possible, cross cutting issues will be dealt with together.*

**The hearing sessions will predominately relate to flood risk matters and the implications thereof.**

**Matter 1: Flood risk**

*Issue 1: Whether the allocation of sites is consistent with national policy in relation to Flood Risk, with particular reference to the utilisation of the Sequential Test as set out within the Framework and Planning Practice Guidance, Policy EN7 of the emerging Core Strategy and justified based on accurate up to date evidence?*

1. Has the Sequential Test been appropriately applied, based on up to date and accurate information[[1]](#footnote-1) for all sites which are proposed to be allocated? To what extent is the information contained within both Flood Risk Topic Papers consistent with the Level 2 Strategic Flood Risk Assessment?
2. Have all sources of flood risk been rigorously appraised?
3. How has the most recent climate change data been assessed, and what if any, are the implications for the identification of sites?
4. How has the balance between regeneration objectives and flood risk management been considered with particular relevance to sites identified within section 3 of the Level 2 SFRA?
5. In identifying and allocating individual sites within the AAPs, to what extent have **both** elements of the Exception Test been considered and passed, including sites which benefit from an extant planning permission, consistent with Paragraph 102 of the Framework and advice within the Planning Practice Guidance? How is the requirement to provide for the storage of flood water reconciled with development within flood zones 2, 3a and 3b?
6. As a result of further information following the Boxing Day floods of 2015 a number of modifications have been proposed by the Council and the Environment Agency within the Statement of Common Ground PS. B006e, in addition to those which have previously been proposed DPM0011, and DPM0015. Are the proposed modifications effective, consistent with Paragraph 102 of the Framework, and would they be required to ensure that the SCRC AAP is sound?
7. How have flood related matters informed the Sustainability Appraisal of both Area Action Plans?
8. What are the implications of potential flood risk, including surface water flooding on the provision of specific housing and other developments, and would this impact on the subsequent delivery of the objectives of the Core Strategy?

*Issue 2: Whether the AAP policies relating to flood risk and water management are effective and consistent with national policy, the emerging Core Strategy and each other?*

1. To what extent are the policies within both plans effective and realistic in mitigating, and militating against flood risk, including the use of Sustainable Urban Drainage systems?
2. Is there adequate certainty that the policies of both AAPs will be effective in ensuring the implementation of green and blue infrastructure required to be consistent with national policy and emerging CS Policy EN7.
3. Is there any link between the successful development of allocated sites and the provision and opening up of additional green and blue infrastructure? If so, how is this to be achieved and will it be effective?
4. Are policies SCRC/CC1 and BCC/CL2 consistent with national policy, the Core Strategy and each other? Is the wording of both policies adequately clear so that they will be effective? With reference to BCC/CL2 is it appropriate that an assessment of the impact on flooding elsewhere is restricted to the city centre? How is proposed modification DPM029 required to ensure that the Plan is sound?

1. For example all the sites within the City Centre which require to pass the Exception Test are shown to have planning permission. However, they are proposed to be delivered later in the plan period. See also, EA’s original representation. [↑](#footnote-ref-1)