

Development Plans Team
City of Bradford Metropolitan District Council
2nd Floor South
Jacob's Well
Bradford
BD1 5RW



Our ref: [REDACTED]
Your ref:

22 February 2016

Dear Sir/Madam

**LOCAL PLAN FOR THE BRADFORD DISTRICT – BRADFORD CITY CENTRE
AREA ACTION PLAN – PUBLICATION DRAFT REPORT**

Thank you for consulting us on the City Centre AAP and for allowing us additional time in which to comment following the floods earlier this year.

VISION AND OBJECTIVES

The Vision

We are pleased to see that our previous comments have been included relating to aspirations for improving green and blue infrastructure within the AAP boundary.

Objective 3

We also welcome the reference to remediation of historically contaminated sites as suggested in our previous response.

Objective 8

The inclusion of 'reopening watercourses' at the end of objective 8 is positive and welcomed.

We note our other comments on objective 8 have not been incorporated. However, we acknowledge that the general context of these comments has been picked up in paragraph 4.104 and the associated evidence base document 'Bradford City Centre Green Infrastructure Study, October 2014'.

NEIGHBOURHOODS

As a result of the Boxing Day 2015 floods, a number of properties in Bradford were affected which have not previously flooded. It is imperative that the flood outline for this event is considered for the proposed sites put forward in this document. Appropriate mitigation measures should be proposed on the site assessment forms and will need to be included in any future flood risk assessments submitted.

It may also be appropriate to consider incorporating this latest flood event in the Level 1 and Level 2 SFRA's.

Site B/1.2: No.1 City Park

The narrative associated with this site suggests that it is located in flood zone 3a. Our flood map shows it to be located in flood zone 1 and therefore at lower risk of flooding. Table 3-6 in the Level 2 SFRA (dated September 2015) also suggests that this site is in flood zone 1 but may be at 'nominal risk of surface water flooding'. We recommend that the flood risk comment is reviewed to reflect the correct situation.

Site B/1.5: Former Yorkshire Water Depot

We recommend that the narrative associated with flood risk on this site also highlights the requirements for the sequential and exception tests to be applied and passed on this site as stipulated in the Level 2 SFRA.

PLANNING POLICIES

Policy CL2: Flood Risk

The wording of this policy is quite clumsy and contains errors, particularly bullet point B, and you may wish to consider reviewing it.

The second paragraph of this policy should be expanded to include reference to the exception test as required by the NPPF. Table 3 of the PPG shows when the exception test is required – ie highly vulnerable uses in flood zone 2 and more vulnerable uses in flood zone 3 (note that highly vulnerable uses are not appropriate in flood zone 3, such uses include basement dwellings amongst others). It is noted that paragraph 4.30 mentions the exception test, but we consider it appropriate to include it in the policy itself.

Currently, the policy refers to the need for a site-specific FRA, which is just one of the elements required under the NPPF. All proposals in flood zones 2 and 3 will require a site specific FRA.

Bullet point B – we recommend the addition of 'taking into account climate change' after 'lifetime of the development'.

Bullet point B.2.v. refers to 'criterion 4a' but there is no indication of what this is. This needs to be explained.

Policy M6: Green/Blue Infrastructure and Open Space within the City Centre

We welcome and support the inclusion of this policy. The Green Infrastructure Study identifies the multiple benefits of green and blue infrastructure, for example the use of playing fields as flood storage areas. Such measures will help people and wildlife adapt to the possible future impacts of climate change.

Policy BF3: Built Form and the Environment

We welcome the inclusion of bullet point C relating to ground contamination.

We would like to see an additional bullet point added to this policy to protect and, where possible, improve controlled waters in line with the objectives of the Water

Framework Directive (WFD). WFD objectives are to prevent deterioration of water bodies, to achieve good status in water bodies and to prevent pollutants entering water bodies). The Bradford Beck which crosses parts of the AAP is currently achieving 'poor' status. We suggest:

'Future development proposals will be expected to address the key objectives of the Water Framework Directive and respond to the guidance and recommendations in the Humber River Basin Management Plan.'

If you require any clarification or wish to discuss these comments please contact me on the details below.

Yours sincerely


Sustainable Places – Planning Adviser

Tel: 

Email: ">