

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 – SHIPLEY AND CANAL ROAD CORRIDOR AREA ACTION PLAN – PUBLICATION DRAFT REPORT

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

VISION AND OBJECTIVES

We support the Vision which is clear and provides aspirations for significant improvements to the area with a strong focus on improving the natural environment to achieve enhanced biodiversity and ecology within the AAP.

DEVELOPMENT PROPOSALS

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 SFRAs.

DF2: Junction Bridge, Briggate

The site summary identifies that this site lies partially in flood zones 2 and 3a. No discussion is given on the impact of this on potential developments and possible mitigation measures that will be required. In order to meet aspirations to enhance green infrastructure on the site, and comply with the requirements of the NPPF Sequential Test, no built development should take place in those parts of the site which fall within the flood zone.

DF4: Dockfield Road North and DF5: Dockfield Road South

Parts of DF4 are identified as being within flood zone 3b (functional floodplain). Table 3 of NPPG makes it clear that development is not appropriate in zone 3b (with

the exception of essential infrastructure, subject to passing the Exception Test, and water compatible uses). This should be made much clearer in the AAP. The Environment Agency will object in principle to any development proposals for less, more or highly vulnerable uses in flood zone 3b.

DF6: Regent House

Part of this site lies in flood zone 2, but this has not been identified in the site details. Any proposals for development on this site will need to be accompanied by a flood risk assessment.

DF9: Dockfield Road

Part of this site lies in flood zone 2. Development will be subject to the requirements for a flood risk assessment. We suggest this is mentioned in the assessment.

SE1: Shipley East

Parts of SE1 are identified as being within flood zone 3b (functional floodplain). Table 3 of NPPG makes it clear that development is not appropriate in zone 3b (with the exception of essential infrastructure, subject to passing the Exception Test, and water compatible uses). This should be made much clearer in the AAP. The Environment Agency will object in principle to any development proposals for less, more or highly vulnerable uses in flood zone 3b.

We welcome the expectation for developers to provide ‘significant improvements to green infrastructure...’ Bradford Beck is currently achieving poor ecological status under the Water Framework Directive (WFD), and any proposals should ensure that the objectives of WFD to achieve good status in water bodies and to prevent pollutants entering waterbodies, are met and must not result in deterioration in the quality status.

NBW1: New Bolton Woods

We fully support the aspirations of both the Green Infrastructure and Ecology, and Flood Risk sections for this site, which should bring multiple environmental benefits and help to achieve the objectives of WFD, and adaptation to climate change.

POLICY FRAMEWORK

Policy SCRC/CC1: Flood Risk and Water Management

We support this policy.

It should be noted, however, that 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 and appropriate mitigation proposed in any future flood risk assessment for development proposals. It may also be appropriate to consider the impact from this flood event in the Level 2 SFRA.

Policy SCRC/NBE1: Green Infrastructure

We welcome and fully support this policy.

Policy SCRC/NBE2: Waterway Improvements

Whilst we would prefer to see the inclusion of a direct WFD reference, the objectives of WFD are implicit within the type of improvements listed. We suggest the words “where appropriate and feasible” can be removed from point B as developments negatively impacting on watercourses are unlikely to be compliant with WFD anyway.

Policy SCRC/NBE3: The Bradford Beck

We are fully supportive of maximising opportunities to re-naturalise watercourses, particularly opening up existing culverts. These bring not only huge benefits to wildlife, but also help to manage flood risk.

Policy SCRC/NBE3: Biodiversity and Ecology

We support this policy, subject to a minor wording change in point A, as highlighted below

‘Development proposals likely to have an adverse effect on biodiversity, important habitats ~~and~~ **or** areas designated as a Local Wildlife Site, Site of Ecological/ Geological Importance, (SEGI))or Bradford Wildlife Area (BWA) will be assessed in accordance with Core Strategy.’

Policy SCRC/NBE6: Ensuring high quality design

We would like to see the inclusion of the natural environment into point 4, as follows ‘...enhances the quality of the built and natural environment...’

If you need any clarification or would like to discuss our comments please contact me on the details below.

Yours sincerely


Sustainable Places – Planning Adviser

Tel: 

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