

City of Bradford Metropolitan District Council

Examination of the Shipley and Canal Road Corridor and Bradford City Centre Area Action Plans

Flood Risk Statement of Common Ground

9th November 2016

Between:

1) The City of Bradford Metropolitan District Council (CBMDC)- the Local Planning Authority

2) The Environment Agency (EA)

1. Background and context

1.1 The CBMDC are producing Area Action Plans (AAP) for the City Centre and the Shipley and Canal Road Corridor (SCRC). The National Planning Policy Framework (NPPF) (paragraphs 99-102) requires Local Plans to take account of flood risk by directing development away from areas at highest risk but where development is necessary making it safe without increasing flood risk elsewhere.

1.2 As part the statutory consultation on the AAPs the EA made representations relating to flood risk on the AAP Publication Drafts. As part of their representation the EA raised the following points:

- General support for the overall policy approach to flood risk and water management in both AAPs
- Comments regarding site specific flood risk issues
- A number of properties in Bradford were affected as a result of the Boxing Day 2015 floods which have not previously flooded. The flood outline for this event needs to be considered and appropriate mitigation proposed in any future flood risk assessment for development proposals

1.3 As part of the Inspector's initial questions regarding the Examination of the AAPs, the Inspector (Ms Louise Nurser) requested CBMDC to provide further evidence to enable consideration of the soundness of the plans, and the deliverability of the sites identified within them, in relation to flooding as set out below:

I understand from the representations made by the Environment Agency that Bradford was affected by last year's Boxing Day floods. As the evidence which accompanies both AAPs predates this severe event this raises obvious concerns that the allocations set out in the two plans have been made in the absence of the most up to date information. Therefore, I would be grateful to understand how this is to be addressed.

- 1.4 Following the Inspector's initial questions the CBMDC commissioned flood risk consultants JBA Consulting to undertake a further assessment of the impact of the December 2015 Boxing Day flooding event for the two Area Action Plans.
- 1.5 This statement has been prepared by the above parties to identify key areas of common ground between CBMDC and the EA following the updated AAP flood risk evidence with regard to the approach for managing and mitigating flood risk in the AAPs.

2. Matters of Agreement in Principle

- 2.1 The CBMDC has worked closely with the Environment Agency as the statutory regulatory body throughout the preparation of the AAPs and both AAPs are supported by a Level 2 Strategic Flood Risk Assessment (SFRA), in accordance with NPPF paragraphs 100 and 166.
- 2.2 The Level 2 SFRA provides a more detailed understanding of flood risk in the AAP areas and has supported the AAP site allocation process in terms providing the evidence required to inform the Sequential and Exception Test. The final Level 2 SFRA (2015) has been agreed by both parties.
- 2.3 A draft version of the historical outline for the Boxing Day 2015 flooding event has been provided by the EA.
- 2.4 The findings from this updated flood risk evidence confirm that no sites or areas in the City Centre AAP boundary were impacted by this event. The following sites located within the SCRC AAP boundary were identified as being impacted by this event
 - DF4/DF5
 - DF9
- 2.5 The Council's flood risk consultants JBA Consulting have produced a re-assessment of flood risk to development Sites DF4/DF5 and DF9 following the release of updated Environment Agency fluvial flood mapping and draft flood mapping extents for the December 2015 Boxing Day flooding event. This is provided in a separate document submitted as part of the AAP Examination.
- 2.6 The EA recognises that the Council has sought to assess the latest and most up-to-date information on flood risk for the AAP areas. It is considered the findings and recommendations of the re-assessment of flood risk is based on the most up-to-date flood risk evidence and flood mapping extents for December 2015 Boxing Day flooding event and the assessment identifies appropriate recommendations and mitigation measures for the proposed AAP site allocations.

3. Actions and Proposed Modifications

- 3.1 In response to the updated flood risk evidence CBMDC propose the following actions:
 - Update the SCRC AAP Flood Risk Topic Paper (dated August 2015) to confirm that the sequential test for site DF9 has been applied and passed

- Propose a main modification to the SCRC AAP to amend the site allocation statement for site DF4/DF5 to substitute the proposed land use of the northern part of residential mixed use allocation DF4/DF5 site to water compatible uses (green infrastructure/open space/flood risk infrastructure) as set out below
- Propose a main modification to the SCRC AAP to amend the site allocation statement for site DF4/DF5 to reduce the site's expected development from 90 residential units to 50 residential units to ensure more vulnerable development can be directed to areas of lower flood risk and safeguard the functional floodplain
- Propose a main modification to the SCRC AAP to amend the site allocation statement for site DF4/DF5 to include additional wording in regards to considering flood risk mitigation as part of a comprehensive approach across the site as set out below
- Propose main modification to the SCRC AAP to amend the site allocation statement for site DF9 to include the requirement for a site specific Flood Risk Assessment (FRA) as set out below

3.2 The CBMDC considers that the proposed modifications to the sites DF4/DF5 and DF9, as set out below, are the most appropriate strategy when considered against the alternatives based on the evidence. The CBMDC consider that deleting the DF4 part of the site from the overall site allocation boundary would have no benefit in terms of improving flood risk in this area in the future and would not enable a comprehensive approach to managing and mitigating flood risk across the whole site (DF4/DF5).

Proposed Modifications

1. Proposed Modification to site allocation DF4 / DF5. Amend site allocation statement as follows:

DF4: Dockfield Road North / DF5: Dockfield Road South Site

Address: Land to north and south of Dockfield Road

Existing Use: Vacant

Proposed Use: Residential Mixed Use and water compatible uses

Site size: 1.26ha

Flood Zone: DF4 zone 3a and functional floodplain along River Aire (majority). DF5 zone 2 (parts) and zone 3 (limited) to west of site along Bradford Beck

Site Proposal

The comprehensive redevelopment of ~~land north and south of Dockfield Road~~ the site will be supported. The ~~Dockfield Road South site (DF5)~~ land to the south of Dockfield Road (DF5) is suitable for residential led mixed use development. The land to the north (DF4) should be considered for water compatible uses including green infrastructure, open space and flood risk management as part of any comprehensive redevelopment of the site.

Flood Risk

Dockfield Road North (DF4) is identified as being at significant risk from the River Aire with the majority of the site located in the functional flood plain (flood zone 3b). **Development will not be considered appropriate in zone 3b (with the exception of essential infrastructure (subject to passing the Exception Test) and water compatible uses).** As part of any comprehensive redevelopment of these sites, **development proposals will be expected consider flood risk mitigation or resilience measures, which could include a further assessment of DF4 for open space/flood control infrastructure.** More vulnerable uses including residential **uses** should be directed to Dockfield Road South (DF5) and areas of lower flood risk. ~~Any business or other less vulnerable uses should be located on the Dockfield Road North, safeguard the functional floodplain.~~

Development will be expected to:

- be supported by a site specific flood risk assessment.
- result in no net loss of the functional floodplain (zone 3b) and not increase flood risk elsewhere
- safeguard land in the functional floodplain for green infrastructure, **open space** and flood risk management

Any detailed site specific flood risk assessment, should consider a review and update of the 2005 Upper Aire model, to assess the outputs and risks to the site based on more up to-date hydrological conditions and model components, in line with the recommendations of the SFRA Level 2.

A site specific FRA will need to demonstrate any proposed development will be safe for its lifetime and consider mitigation or resilience measures which could include further assessment of DF4 for open space/ flood control infrastructure, including details of type of development, design, layout depth of flooding and velocities (including the new climate change allowances). Depending on the type of development and risk of flooding, a flood warning and evacuation plan may also be required.

Expected Development

90 50 residential units/ **with** supporting business uses.

2. Proposed Modification to site allocation DF9. Amend site proposal statement as follows:

DF9: Dockfield Road

Site Address: Land between Dockfield Place and

Dockfield Road, Shipley

Existing use: Vacant industrial

Proposed Use: Residential redevelopment

Site size: 0.13ha

Flood zone: Zone 2 (north part of the site)

Site Proposal

The site is suitable residential redevelopment.

Development should provide medium/high density townhouse or terrace type housing, reflecting surrounding housing types.

Flood Risk

Part of the site falls in flood zone 2. Development will be expected to be supported by a site specific flood risk assessment.

City of Bradford Metropolitan District Council

Print Name A Marshall

Signed A Marshall

Date 17/11/16

Environment Agency

Print Name RACHEL JONES, PLANNING SPECIALIST, YORKSHIRE AREA, SUSTAINABLE PLACES TEAM

Signed R Jones

Date 18/11/2016

