

**Bradford Local Plan**

**Core Strategy Examination**

**Councils Response to Participants Further  
Statements on Sequential Testing Paper and  
Policy EN7**

**Date: 29<sup>th</sup> April 2015**

## Introduction

- 1.1 This document responds to the further statement produced by Philip Moore and the Menston Action Group (MAG), document reference PS/F078, in response to document PS/F060, a paper setting out the Council's approach to sequential testing, and EN7.

## Response

- 1.2 The concern of MAG is broadly that Policy EN7 and Further Statement PS/F060 do not adequately take into account the flood risk from all sources including groundwater flooding. Rising groundwater is different from river flooding or surface water flooding. The issues are raised in the context of concerns that the current drainage proposals for development of land at Derry Hill and Bingley Road in Menston will increase flood risk in neighbouring areas.

- 1.3 The policy as worded explicitly refers to flood risk and in so doing relates to all types of risk from flooding in line with NPF and NPPG. While the Council do not think that plans should where possible repeat national policy and guidance it is suggested that the NPPF definition of 'flood risk' be incorporated into paragraph 5.4.132 in support of Policy EN7 as a main modification. This would provide clarity within the plan itself. The suggested modification is as follows:

'The overall objectives are to appraise, manage and reduce the risk of flooding. Policy EN7, set out below, identifies principles to guide the process of identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management. **The NPPF defines flood risk as: 'a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.'**

- 1.4 In response to issue A1, it was not considered appropriate that flood risk assessment from all water sources be integrated into sequential testing for all levels of plan-making, as the strategic level of testing has been carried out and data was not available that could be used at a strategic level. The testing that has taken place allows sufficient flexibility, where data exists, to take into account flood risk from all water sources at the site specific level of assessment. It is proposed that a reference be included to paragraph 5.4.143 of the text accompanying EN7 to set out this approach. The suggested modification is set out below.

'This approach reflects that in the NPPF, which requires Local Plans to take account of climate change over the longer term and plan new development to avoid increased vulnerability to the range of impacts arising from climate change. The sequential testing approach is supported and Technical Guidance has been produced setting out how

this policy should be implemented. Key principles identified are; safeguarding land from development that is required for current and future flood management, using opportunities offered by new development to reduce the causes and impacts of flooding and developing policies to manage flood risk from all sources. **When applying sequential testing principles to the choice of sites for future development, where data exists, all sources of flood risk will be taken into account, including those associated with ground water flooding.**

- 1.5 In response to issue A2, requiring space for the storage of flood water in the policy text, needs to be linked to evidence of a need for this, hence the link made with this requirement and flood risk zones 2 and 3a. It is considered that the opening sentence of paragraph 5.4.154 supports the site design principle of identifying space for water as an integral part of development proposals in order to manage flood risk.
- 1.6 In response to issue A7, the policy already requires that all sources of flooding are addressed, that development proposals will only be acceptable where they do not increase flood risk elsewhere and that the need for improvements in drainage infrastructure are taken into account. The amendment requested by MAG is too specific and onerous to introduce as a strategic policy, but where appropriate would need to be justified on a case by case basis.