

## **Bradford Local Plan**

### **Core Strategy Examination**

#### **Further Statement Relating to Flood Risk For :**

#### **Matter 3 – Revised Spatial Distribution of Development**

**(Policies HO3, EN7, BD1, AD1, WD1, PN1)**

**May 2016**

## **1. Introduction**

- 1.1. This statement sets out the Council response to EIP hearing statements made by various parties relating to flood risk and is designed to assist the Inspector in considering the soundness of the Core Strategy and the questions posed particularly within matter 3.
- 1.2. The Council has already submitted position statements for each matter and has responded in full to the representations made at main modifications stage within its Statement of Consultation. The Council's further statements therefore merely make supplementary points particularly in relation to new matters raised by participants or points of clarification.
- 1.3. The Council have not sought in these further statements to address matters which were not the subject of main modifications and which the Inspector has made clear will not be subject to further discussion within the hearings.

### **Flood Risk Management Issues**

- 2.1 Responses to the Inspectors questions from a range of organisations have raised a number of general and more specific flood risk issues. These have been briefly summarised below and a response provided.

#### **A. Concerns that SFRA and flood risk data are not adequate or up to date.**

- 2.2 The SFRA does identify a range of data layers in relation to flood risk that allow assessment and sequential testing to take place as appropriate to a Core Strategy.
- 2.3 The Council confirmed during the initial Examination hearings that its proposed housing distribution had been subjected to and informed by a sequential testing process in consultation with the Environment Agency. That sequential testing was captured within statement PS/F060.
- 2.4 That statement discussed a range of flood risk issues but significantly part 2 presented analysis of the land supply, a breakdown of where that supply fell with regards to the flood risk zones defined by the Environment Agency and thus an indication of whether the proposed housing quantum contained within the Publication Draft could be delivered without the use of the higher risk flood zones 2 and 3. On page 8 of the statement it was suggested that in 24 out of the 27 settlements, the proposed housing quantum were capable of being realised without the use of any flood zone 2 or 3a land. Subsequent sub sections analysed groups of settlements in more detail. It is worth noting given the objections received, the 3 settlements where data at that time indicated that a small contribution from sites in higher flood risk zones might be required were not those within Wharfedale but within the City Centre, the Canal Rd Corridor and within Shipley.
- 2.5 The Council can confirm that it has carried out a similar process of data analysis to test the slightly revised housing distribution as modified and using the updated SHLAA 3

land supply data. This is being incorporated into an updated sequential paper in consultation with the Environment Agency. However the data again confirms that in the majority of the district's settlements the proposed and slightly modified housing apportionments can be met if necessary entirely from sites lying within flood zone 1. The City Centre and the Canal Road Corridor settlements continue to require a small contribution from sites within higher flood risk zones, however the amount required has fallen largely due to increased site capacity within the City Centre in SHLAA 3 compared to SHLAA 2. The targets proposed for Ilkley and for each of the Local Growth Centres (including Burley in Wharfedale, Menston and Silsden) can be met entirely from sites within flood zone 1 as can the target for all of the Local Service Centres.

- 2.6 The Council acknowledges that the data analysis indicated above is based only on fluvial flood risk, however the approach to sequential testing at this strategic stage of the plan making process has been signed off by the Environment Agency who the Council notes have raised no objections to the proposed housing distribution. Moreover Policy EN7 requires further and more detailed sequential testing to be carried out as part of the Allocations DPD work. The Council also acknowledges that the layers relating to fluvial flood risk may need to be further updated prior to testing sites at the pre-allocations stage and we will provide an update from the Environment Agency of the timescale for their input to this updating process. At present the Council, based on the emerging work being undertaken by the Environment Agency are aware of no indications to suggest that fluvial flood risk zones will see significant change within Wharfedale as a result of the December 2015 floods, however if such changes are made they will be incorporated into both updated SFRA and into the site assessments carried out at Allocations Plan stage.
- 2.3 To conclude the Council has undertaken further analysis in support of the sequential testing paper in light of the main modification redistribution. Contrary to the suggestion from some respondents the proposed redistribution does not rely on the need to potentially allocate land within high risk zones (fluvial) based on current data.

#### B. Concerns about adequacy of sewerage and drainage infrastructure.

- 2.4 Assessment of flood risk has currently taken place at a strategic level. Where liaison with the Environment Agency and Yorkshire Water has highlighted issues at a strategic level, these have been addressed. In this respect, a modification to the plan has been made in the Airedale sub-area policy to highlight the issue of the Airedale Trunk Sewer. Policy EN7 element 7 indicates a need to take into account improvements in drainage infrastructure.

#### C. Surface water flooding has not been taken into account.

- 2.5 It is acknowledged that all sources of flooding need to be taken into account in assessing risk and that data sets relating to surface water are available. However provided a cautious approach is taken in relation to making an assessment of capacity to accommodate development within the high risk zones associated with river flooding

i.e. within the Environment Agency zones 2 and 3, then it is considered that sufficient flexibility should be available, to allow surface water, as a more localised source of flood risk to be taken into account at the pre-allocations stage. It should be noted that in most of the settlements to which significant representations or flood risk concerns have been raised i.e. at Silsden, Addingham, Ilkley, Burley and Menston the capacity of deliverable and developable land supply lies well in excess of the proposed housing quantum therefore allowing a range of site options to be tested at Allocations DPD stage and sites with lower flood risk to be selected.

#### D. Groundwater flooding issues

- 2.6 It is acknowledged that all sources of flooding need to be taken into account in assessing risk, however the availability of adequate data which would allow testing to take place at a strategic level would be a factor that needs to be taken into account. The extent and degree of incidence in the district context was considered in the SFRA and factors that were relevant to making an assessment of groundwater were identified. The conclusion was that this was not considered to be a strategically significant issue in the context of Bradford District. Groundwater flooding is regarded by the Council and the Environment Agency as a relatively local source of flooding and as such could be taken into account at the pre-allocations stage.

#### E. Recent flooding needs to be taken into account

- 2.7 The Council and the Environment Agency are currently reviewing outlines from recent flood events and some consultation with the public is taking place. Early consultation is taking place in relation to the River Aire flooding and it is likely that this process will continue.