

Bradford Local Plan

Core Strategy Examination

Further Statement Relating to Home work item 3:

Outline of elements of key work on Flood risk in support of the Core Strategy and future work as part of Local plan

May 2016

1. Introduction

- 1.1. This statement sets out the Work undertaken in relation to flood risk as part of the Core Strategy together with future work as part of wider local plan and related wider work by the Council as the Lead Local Flood Authority. This has been produced at the request of the Inspector at the hearing on Matter 2 held on 17 May.

Core Strategy

- 1.2. The Core strategy is supported by a Level 1 Strategic Flood Risk Assessment (EB/048) which considers all sources of flooding using the most update to date data available at that time. This was produced by JBA on behalf of the Council with support and input from the Environment Agency as well as the Councils Drainage Team.
- 1.3. This was supplemented by a sequential testing paper (PS/F060) which considered the fluvial sources of flooding and concluded that the proposed spatial distribution for housing could be accommodated using land outside of flood zones 2 and 3 apart from some limited areas within city of Bradford and Shipley.
- 1.4. The Council has undertaken an update to the sequential testing analysis which includes the housing distribution as modified set against SHLAA 3 (PS/G004i). This provisional analysis has been shared with the Environment Agency whom support the approach and conclusions. See also further statement PS/L011 which sets out a response to the further comments in relation to flood risk and sets out headlines from the update. The Council is in the process of incorporating the analysis into an updated sequential testing paper.
- 1.5. The Core Strategy is supported by a Local Infrastructure Plan (LIP) (PS/B001b) which considers Infrastructure including those related to flood risk and drainage for the District as well as by each sub area. A further updated LIP has been published in support of the Community Infrastructure Levy Draft Charging Schedule in December 2015. A further update is in progress.
- 1.6. The Core Strategy includes a range of polices which seek to address Flood risk including Strategic Core Policy 2 (SC2) on climate change. This sets out the headline approach which includes managing flood risk from all sources. The detail on how the local plan will consider and manage flood risk is set out in more detail in policy EN7. This sets out a number of considerations for development proposals. These will be addressed for the more detailed Local Plan Documents that will allocate land.
- 1.7. The Council proposed a main modification to policy EN7 (MM127/128) which provide clarification on the implementation of the policy. Proposed modification MM127 sets out the sources of flooding in line with NPPF, while proposed Modification MM128 clarifies the approach to testing sites in the more detailed site allocating documents to make clear this should have regard to all sources of flooding.
- 1.8. The approach to Flood risk is appropriate to the level of Local Plan document being produced and is supported by proportionate evidence. This has had regard to and broadly accords with the approach set out in NPPF in particular paragraph 100. It is

also important to note that paragraph 100 identifies that Local Plans can use opportunities offered by new development to reduce the causes and impacts of flooding.

Further work

- 1.9. There are two Area Action Plans which are in line with the Core Strategy as well as with the NPPF and NPPG and they are supported by a Level 2 Flood Risk Assessment.
- 1.10. Similarly the Allocations DPD will be subject to further testing and Level 2 work which will look at all sources of flooding.
- 1.11. Policy EN7 of the Core Strategy would apply to planning applications which may also be required to be supported by a Flood Risk Assessment to demonstrate how they have addressed the matters at a site level.

Lead Local Flood Authority (LLFA)

- 1.12. Under the Flood and Water Management Act the Council, as the Lead Local Flood Authority, has a range of duties with regards to flood risk and drainage. Under Section 9 of the Act the Council is required to develop, maintain, apply and monitor a strategy for local flood risk management : a Local Flood Risk Management Strategy (LFRMS) which the Council has recently published a draft for public consultation. Once finalised it will provide, in alignment with current legislation and guidance, the Councils overall approach for managing flood risk and builds upon the work already undertaken to assess the risk of flooding from all sources in the district, including the Strategic Flood Risk Assessment in support of the Core Strategy. The LFRMS in this respect aims to raise awareness and understanding of flood risk to inform both community and key stakeholders and look to ensure a coordinated local approach to prioritise flood risk management activities and investment.