

Mr Andrew Marshall
City of Bradford Metropolitan District
Council
Development Services
Jacobs Well
Bradford
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Our ref: RA/2006/100240/CS-
03/PO1-L01

Your ref:

Date: 31 March 2014

Dear Mr Marshall

BRADFORD DISTRICT CORE STRATEGY PUBLICATION DRAFT

Thank you for consulting us on the above document which we received on 12 February 2014.

We are pleased to see that our previous comments have been taken on board and included within the latest iteration of the Core Strategy and we offer our full support to these, in particular:

Policy HO7 – Housing Site Allocation Principles: inclusion of flood risk sequential test

Policy HO12 – Sites for Travelers and Travelling Showpeople: inclusion of avoiding areas at high risk of flooding

EN7 – Flood Risk: criteria that development will not increase flood risk elsewhere; and requiring greenfield run-off rates for greenfield sites.

EN8 – Environmental Protection: specific inclusion of 'groundwater'; recognition of the requirements of the Water Framework Directive to protect and improve the status of waterbodies.

EVIDENCE BASE/BACKGROUND DOCUMENTS

Strategic flood risk assessment:

As you are aware, we have been involved in discussions and attended a recent meeting with your colleagues in relation to the SFRA. Our final comments on the SFRA will follow separately in due course.

The draft SFRA has been used in preparation of the core strategy to identify the broad locations for growth and development. We are pleased to see that the majority of planned growth has been located out of flood zones 2 and 3, which we understand has been derived at using the most up to date maps and information on flood risk within the district.

Environment Agency

York, YO30

Cont/d..

Sequential test:

Page 250 of the Statement of pre-consultation refers to a sequential test paper being prepared. We have not been able to locate this paper amongst the documents on the website. However, we note that the background paper on housing (part 1 – housing requirement, supply and distribution) acknowledges the need for and requirements of the sequential test. Some growth is planned for areas within flood zones 2 and 3 (ie within the City Centre and Canal Road Corridor AAPs), but the background paper provides an explanation as to why these areas are sequentially preferable.

We welcome the addition to Policy HO7 under bullet point G7 to include a new criteria for sequentially locating development in terms of flood risk, as requested in our previous response – “*Applying a flood risk sequential approach to direct development to areas of lowest flood risk.*”

Appendix 4 of the background paper demonstrates that a significant proportion of growth will be in the lowest flood risk area. The desired outcome of a sequential approach to the location of development has been achieved and we fully support this, however, we consider that preparation of a sequential test paper, which pulls together all the information in one document, will provide much more transparency to demonstrate how the sequential test is being applied and recommend that the council pursues this.

Exception test:

For those sites which are being considered for development within flood zones 2 and 3, the exception test will need to be applied in line with Table 3 of the National Planning Practice Guide. At the site selection stage, you will need to demonstrate that the exception test has been passed. Part 1 of the exception test will need to justify the wider sustainability benefits of locating more vulnerable development such as housing in areas of flood zone 3.

DUTY TO CO-OPERATE**Aire valley trunk sewer:**

We have previously raised concerns with regards to capacity issues within the Aire Valley Trunk Sewer. Whilst we can see that the issue has been identified within the Local Infrastructure Plan (LIP) and that there is an acknowledgement that housing may need to be phased, we are concerned that it does not appear to have been translated into the policy for the Airedale Sub-area. The LIP highlights that “*The capacity of the sewer is clearly an issue for housing and employment growth, as 8,350 new homes are planned for Airedale, with the majority requiring connection into the Aire Valley Trunk Sewer*”.

In our response to the Further Engagement Draft consultation we made the following comments and suggested policy wording to be included within Policy AD2. This does not appear to have been taken on board and we have not been able to find the council's response to this suggestion.

Airedale Sub-Area Policy:

The proposed growth within the catchment of the Aire Valley Trunk Sewer is of concern because there are known capacity problems with the trunk sewer. This issue and the Environment Agency's concerns are identified in paragraph 8.2.2 of Infrastructure Evidence Base.

We consider that additional growth in this area will pose infrastructure challenges in relation to foul drainage provision. Yorkshire Water must be fully involved in this consultation process and the Core Strategy must ensure that development is only brought forward when the necessary infrastructure is in place to serve that development. In cases where new infrastructure is likely to be needed, the Core Strategy should make clear how the infrastructure will be delivered. This could be through developer contributions for instance or other related strategies.

We would recommend that this issue be profiled within Policy 2 (AD2) under investment priorities, particularly as significant growth is planned in Silsden and Steeton with Eastburn. This policy should include some words to reflect the issue. The policy needs to say something like:

There are known capacity problems with the Aire Valley Trunk Sewer. The authority will work with Yorkshire Water to understand fully the infrastructure requirements needed to support the growth centres and to ensure that development proposals and resultant infrastructure requirements are incorporated into Yorkshire Water's future investment and Asset Management Plan (AMP) periods and to ensure that these infrastructure requirements form part of Yorkshire Water's Investment strategy. Development will be phased in line with the provision of the necessary infrastructure.

Growth aspirations within Craven District area may also impact on this issue and should be discussed with them to ensure a proper understanding of the infrastructure requirements.

Phasing the delivery of housing to ensure that necessary infrastructure improvements are in place to accommodate the planned growth has been highlighted in Figure HO1 - 10 principals for achieving sustainable housing growth, which states "*Phasing the release of land to ensure that housing growth is coordinated with planned infrastructure provision...*" Policy HO4 covers phasing of housing sites and allows for 2 phases of development, subject to provision of new infrastructure.

More detailed phasing plans are clearly subject to timescales by Yorkshire Water to deliver improvements to the sewerage network. Indications from LIP suggest that this may not happen until Yorkshire Water's AMP6 plans for 2015-2020.

This could seriously impact on two of the district's local growth centres at Silsden and Steeton with Eastburn which between them are expected to accommodate 1,700 new homes in the plan period up to 2030. This impact is not explained within the sub-area policy, nor is it identified as an investment priority.

The Aire Valley Trunk sewer also affects developments within Craven District Council as it starts in their district. The duty to co-operate with them should be clearly explained. Background Paper 1 – Overview does mention the need to co-operate but does not go into very much detail on how the two authorities have worked together. In order to openly demonstrate compliance under the duty to co-operate we would ask for further information about how the strategy for bringing growth forward in the Airedale Sub-Area has been/will be discussed with Craven Council given the cross-boundary nature of the Aire Valley Trunk Sewer.

Without this information it is difficult to assess whether the policy demonstrates the most appropriate option in this regard, which could lead to questions of soundness being raised.

We therefore strongly recommend that prior to submission of the Core Strategy to the Secretary of State, more detail is provided to demonstrate what options have been considered and how the LPAs have agreed to implement them.

We would very much welcome an opportunity to meet with you, and other relevant parties as appropriate, at an early stage, to discuss this, and any other matter raised, so that we can gain a better understanding of how the issue will be dealt with. Please contact me on the details below to make the necessary arrangements.

Yours sincerely

Mrs [REDACTED] Lambert
Sustainable Places – Planning Advisor

