

City of Bradford Metropolitan District Council

Preparation of the Bradford Local Plan

Flood Risk Position Technical Note

1. Background

- 1.1 The council are preparing a new Local Plan for the District. The NPPF 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
- 1.2 As part of the statutory Regulation 18 consultation on the Core Strategy Partial Review (CSPR, 2019) the Environment Agency (EA) made representations relating to flood risk matters and in particular the evidence of flood risk as set out in the Strategic Flood Risk Assessment (2019). As part of their representation the EA raised the following points:
 - the SFRA uses some old model data which should be updated to inform the SFRA adequately;
 - the consideration of climate change is not as is expected;
 - further consideration needed regarding flood zone 3b with the removal of 3ai, and
 - there must be a mechanism for the SFRA maps to be easily updatable, for example as online GIS mapping.
- 1.3 Following the consultation on the CSPR (2019) the CBMDC have liaised with the EA in regards to the issues identified and the preparation of a robust and up to date evidence base for assessing flood risk in the District. The council has also recommissioned consultants JBA Ltd to undertake a further review and update of the Bradford SFRA. The updated SFRA evidence is not available to inform this Regulation 18 Preferred Options Consultation (2021) as the updated river model data requested from the EA is not currently fully available or have not been signed-off by the EA to inform a comprehensive update to the SFRA at this stage. The council and the EA have however agreed the broad principles and approach for updating this evidence once these models are made available.
- 1.4 The council considers that it has worked closely with the EA as the statutory regulatory body throughout the preparation of the new Local Plan Regulation 18 document. The Local Plan includes Policy EN7 Flood Risk that sets out the plan's policy approach for managing flood risk, in line with national policy. A Level 1 Strategic Flood Risk Assessment (SFRA) was prepared for the Bradford District in 2019 and provides data and guidance to inform the flood risk policies and allocations in the Local Plan.
- 1.5 The preparation of the Local Plan for this consultation stage has therefore relied on the best available evidence at the time (the 2019 SFRA) and supplemented with updated flood risk information where possible. The Council is aware that the Local Plan will need to be updated once the updated SFRA Level 1 has been produced to take account of any changes which have been identified due to the new river modelling and national policy requirements. It will also allow the Council to carry out a Level 2 SFRA for those allocations, which fall within an area of flood risk to inform the Regulation 19 Draft Local Plan preparation.

2. Approach to managing flood risk within the emerging Local Plan (Regulation 18)

- 2.1 Areas of flood risk are identified within the most up to date evidence in the SFRA (2019), which has been used to assess the proposed strategic sequential approach to the location of development and consider flood risk in regards to proposed individual preferred option site allocations. Where possible the CBMDC has sought to avoid areas of highest flood risk through the strategic distribution of the housing requirement, settlement targets and individual site allocations. Where any sites are within areas of higher flood risk these have been highlighted in preferred option site allocation pro formas.
- 2.2 The Council are in agreement with EA that in order to effectively manage flood risk as part of the Local Plan preparation, the SFRA (2019) will need to be updated using the latest available river model data, including agreed climate change allowances. However, the full extent of updated river model data in the District is not yet currently available to inform the SFRA evidence as part of this Regulation 18 Local Plan Preferred Options Consultation.
- 2.3 Therefore, the Local Plan is informed by the most up to date available evidence at this stage, on the basis that evidence will be updated with the best available data once future models are available.

3. Principles and approach for updating the SFRA Evidence

- 3.1 In order to ensure that the Local Plan is fully justified and based on robust and up to date evidence the council will continue to work closely with the EA in preparing a new SFRA Level 1 and Level 2 for the District that aligns with the latest national planning policy requirements and planning practice guidance (PPG) on managing flood risk and that the evidence will be informed by the most up to date river model outputs and agreed climate change allowances.
- 3.2 The council are committed to updating the SFRA evidence to fully inform the preparation of the Regulation 19 Publication Draft Local Plan. In this regards the council and EA are in agreement that work on producing and finalising the river model outputs will need to be completed in a timely manner and avoid delay to the progress of the Local Plan as it moves beyond the Regulation 18 stage to publication draft (Regulation 19). It is understood that the EA will endeavour to provide up to date River model updates to inform this evidence when they become available.
- 3.3 For clarity the general principles and approach to be followed within the updated SFRA are set out below, although is not an exhaustive list;
- The SFRA will be in line with the latest national planning practice guidance and NPPF requirements.
 - The Removal of Flood Zone 3ai from the SFRA evidence.
 - Providing flood risk data through the SFRA on updatable GIS maps.
 - To agree and finalise the approach in the SFRA for assessing climate change in key areas, including in areas not marked for development with the EA
 - To agree and finalise the approach to existing development located within Flood Zone 3b? (following the removal of 3ai) with the EA

- To agree and finalise the approach to existing and new development in 3b plus climate change (Future climate change and suitability of development in those locations) with the EA
- To agree and finalise the approach within the SFRA to defining what type of development is considered suitable in what flood zone (sequential approach) and defining what mitigation is expected.

4. Conclusion

- 4.1 This technical note has been prepared by the Council to set out the broad approach to how the council has considers flood risk within the emerging Local Plan (Regulation 18) and to identify areas of common ground between the council and EA with regard to the approach for assessing and managing flood risk in regards to the updated SFRA evidence and preparation of the new Local Plan.