

Local Plan Team
Calderdale Council
Town Hall
Crossley Street
Halifax
HX1 1UJ

24 February 2020

Dear Sir/Madam

Calderdale Local Plan Stage 2 - Public Consultation

Thank you for consulting us on the Housing Requirement Update and Potential Supply document as part of your local plan examination.

We have reviewed the following;

- Calderdale Local Plan - Housing Requirement Update and Potential Supply, dated January 2020

Based on our review of the above document, and its supporting documents we wish to make some general comments regarding site allocations, but also some site specific comments.

Recent flood events

Given the recent flooding events in the Calderdale district we would advise and question whether the proposed site allocations, predominantly for more/highly vulnerable uses, but also less vulnerable uses, have been screened further to ensure that any proposed allocations have not been effected to a degree that would cause issues for the LPA in terms of deliverability that could potentially undermine the proposed allocations.

Hebden Bridge Flood Alleviation Scheme

The Environment Agency is currently developing a flood alleviation scheme for Hebden Bridge. Planning applications are expected to be submitted in autumn 2020, with construction anticipated to begin winter 2020/21 and continue through to spring 2023. Works will be occurring at various locations across the town centre during this time. The current scheme proposals can be viewed at <http://www.eyeoncalderdale.com/hebden-bridge-flood-alleviation-scheme>

To ensure that Environment Agency and third party projects can all be delivered as efficiently as possible, it is advised that the Environment Agency is contacted to discuss any proposed construction work which may fall within the scheme area and within the above timescales. The Environment Agency can be contacted at HebdenbridgeFAS@environment-agency.gov.uk.

Sequential approach

In our previous responses to the local plan, we highlighted the need and evidence requirements for sites to be screened using the Sequential approach, demonstrating that this approach has been undertaken and that any decisions made abide by the Sequential approach. See below NPPF and PPG references for clarification.

NPPF

Paragraphs 155 to 161 of the NPPF make clear that *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*

“All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.”

“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.”

PPG

The Planning Practice guidance – flood risk and coastal change makes clear that the *“Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds.”*

“A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary.”

We would like to see evidence of how these sites have been considered as part the Sequential Test and Site Assessment methodologies.

Sustainability appraisal

Reviewing the sustainability document we see flood risk and sequential approach have been referenced in the following ways;

“SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property?”

The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems.”

“SA13. To ensure efficient use of land?”

On a whole, there would be a positive impact against this SA objective, due to the priority given, through the sequential approach, to the use of previously developed land. There would also be a positive impact in relation to the use of high-density mixed use developments and in reducing the amount of derelict and degraded land. (Positive)”

Again, we would like to see evidence of how sites have been considered in terms of flood risk impacts and as part the sequential test and SA process to ensure deliverability of updated requirements.

General comments – site allocations

We are pleased to see the allocations generally identify site constraints, for example flood risk and contaminated land. Where this is concerned the site allocations then detail necessary reports required and site specific considerations. This includes for example FRA and contamination reports with specific considerations including hydrological assessment, site specific mitigations etc.

We would suggest that to make clear the requirements relating to the deliverability of site in relation to flood risk these should include, but not be limited to;

- Following a sequential approach to the layout of the site – i.e. locating development in areas of least flood risk.
- To include the requirement of site specific FRA
- To include the potential requirement of flood risk hydraulic modelling
- To specify for sites contained in flood zones 2 and 3 that any more or highly vulnerable uses may not be permitted on the ground floor.
- Emergency Access and egress plans must be provided to the LPA for consideration and agreement with their emergency planners.
- Specific consideration being given to impacts from historic flooding, such as recent flood events in Calderdale.

These comments are likely to apply to all sites which are impacted by flood risk. Please also see the following additional site specific comments following our assessment of existing and additional proposed allocation sites;

Mixed Use Sites

LP1123 - Kinnaird Close, Elland

Site is located in flood zone 2 mostly – Sufficient FRA etc. will be required

LP1088 - West Vale Works

Flood zone outlines may be mis-aligned. The watercourse is an ordinary watercourse (not main river). Site specific Hydraulic Modelling and FRA may be required.

LP0922 - Former Hebden Bridge Fire Station

Cont/d..

The above generic points should be applied. The proposed Hebden Bridge FAS may need to be considered in this location.

LP0573 - Land adjacent Mill Royd Street

Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.

LP0327 - Land off, Halifax Road, Todmorden

We understand this site may have been impacted by the recent flood events. Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.

Housing Sites

LP0571 - Site to the rear of 9A, Birds Royd Lane, Brighouse

The above generic points should be applied. Topographical surveys may be required to inform FRA.

LP1180 - Old Lane Dyeworks, Old Lane, Halifax

The above generic points should be applied. Surface water flood risk to be considered by LPA.

LP1224 - Land North of Meadowcroft Lane, Sowerby Bridge

We understand flooding from river ryeburn effected this area during the recent flood events. Site specific Hydraulic Modelling and FRA may be required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.

LP0659 - Land rear of 302, Halifax Road, Todmorden

We understand this site may have been impacted by the recent flood events. The above generic points should be applied.

LP0177 - Land adjacent Ellistones Place

The above generic points should be applied. Site specific Hydraulic Modelling and FRA may be required as the site is effected by an ordinary watercourse (not main river).

Should you have any questions, or want to discuss these matters further, please contact me on the details below.

Yours sincerely

Mr Fraser Tomlinson

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