



Appendix C: Planning Policy Review Tables

RSS Policy or reference	Comment
<p><i>Part 2: The Regional Development Framework</i> Chapter 5. An Overview of the Regional Spatial Strategy</p> <p>Paragraph 5.14</p> <p>The plan will promote:</p> <p><i>...a more integrated approach to delivering a better environment through land and water management, including better relationship of new development to water resources, flood risk and adaptation to the impacts of climate change</i></p>	<p>This objective sets out the RSS's approach to integrated management of natural resources, including water. Recommendation R8.1 of the Panel Report suggests that this objective should be moved to part 3, chapter 11 of the RSS 'Enjoying and Managing the North West' to give it more prominence.</p> <p>Such an approach is useful with respect to the SFRA but has no direct consequences.</p>
<p>Chapter 6. Regional Development Principles</p> <p>Policy DP1 – Regional Development Principles <i>Tackle climate change</i></p> <p>As an urgent regional priority, plans and strategies should:</p> <ul style="list-style-type: none"> <i>Identify, assess and apply measures to ensure effective adaptation to the likely environmental, social and economic impacts of climate-related changes.</i> <p><i>Proposals and schemes must take into account the local implications of climate change, particularly in vulnerable areas, coastal zones and locations at risk of flooding.</i></p> <p>Recommendation R3.3</p> <p>“Reduce emissions and adapt to climate change”.</p> <p>SOS response: Accept</p>	<p>Policy DP1 sets out the guiding principles underpinning the RSS. This policy makes direct reference to climate change implications with respect to flooding. Recommendation R3.3 of the Panel report was that DP1 should be amended to include a more generic reference to climate change, removing the specific reference to flooding. Such an approach is less useful with respect to the SFRA but has no direct consequences.</p>

RSS Policy or reference	Comment
<p>Para 6.6 (Supporting text for DP1 – Regional Development Principles)</p> <p><i>The impacts of climate change are already evident and becoming more significant. The North West is experiencing hotter summers, increased winter rainfall, sea level rises and consequential decline in the level of protection from existing flood defences and a growing incidence of severe weather conditions.</i></p>	<p>Paragraph 6.6 highlights the dangers of climate change and states there is evidence that risk of flooding is increasing, something which SFRA's must consider and prepare for.</p>
<p>Recommendation R3.10: New Policy:</p> <p>DP8: Reduce Emissions and Adapt to Climate Change</p> <p>As an urgent regional priority, plans, strategies, proposals, schemes and investment decisions (including SFRA's) should:</p> <p style="padding-left: 40px;"><i>“Contribute to the regional policy to reduce CO2 emissions from all sources,...”</i></p> <p>And</p> <p style="padding-left: 40px;"><i>“Identify, assess and apply measures to ensure effective adaptation to likely environmental, social and economic impacts of climate change.”</i></p> <p>Measures to reduce emissions include, for example:</p> <ul style="list-style-type: none"> ▪ <i>Increasing urban density;</i> ▪ <i>Encouraging better built homes and energy efficiency, eco-friendly and adaptable buildings, with good thermal insulation, sustainable urban drainage, green roofs and micro-generation;</i> <p>Adaptation measures might include, for example:</p> <ul style="list-style-type: none"> ▪ Minimising threats from, and the impact of, increased coastal erosion, increased storminess and flood risk, habitat disturbance and increased pressure on water supply and drainage systems <p>SOS Response: Accept recommendation subject to removal of percentage reduction targets. Policy included to give greater priority to climate change issues following representations at EIP. Percentage emissions reductions targets have not been included as these are expected to be set on enactment of the Climate Change Bill.</p>	<p>As noted above, one of the Panel's strongest criticisms of the Draft RSS was that it does not give sufficient consideration to climate change. A number of policy revisions have been recommended as a result, including the incorporation of this new policy. The Panel pointed out that D8 is one of seven new policies that amplify the principles in DP1 and which should be taken together as the spatial principles underlying the Strategy as a whole.</p> <p>There is a potential conflict inherent in this new policy which should be flagged here - increasing urban density can accentuate flooding risk, unless carefully managed through mitigation measures such as SuDS. Application of SuDS can however achieve greater mitigation than patterns of existing built development.</p>

RSS Policy or reference	Comment
<p>Part 3: The Regional Policy Framework Chapter 11. Enjoying and Managing the North West Policy EM5 – Integrated Water Management</p> <p><i>Plans and strategies should have regard to River Basin Management Plans and assist in achieving integrated water management and delivery of the EU Water Framework Directive (WFD). They should protect the quantity and quality of surface, ground and coastal waters and manage flood risk by:</i></p> <ul style="list-style-type: none"> ▪ <i>Phasing development to reflect existing water supply and waste water treatment capacity, unless new infrastructure can be provided ahead of the development without environmental harm;</i> ▪ <i>Implementing the ‘Meeting the Sequential Flood Risk Test – Guidelines for the North West Region’¹⁴⁴;</i> ▪ <i>Requiring that any development which, exceptionally, must take place in current or future flood risk areas is resilient to flooding; protected to appropriate standards and does not increase the risk of flooding elsewhere;</i> ▪ <i>Requiring new, and where possible, existing development (including transport infrastructure) to incorporate sustainable drainage systems and water conservation and efficiency measures;</i> ▪ <i>Raise people’s awareness of flood risks and the impacts of their behaviours and lifestyles on water consumption.</i> 	<p>Policy EM5 is the primary RSS policy with respect to flood risk management. The original policy reflects the fact that it was drafted under PPG 25. The Panel recommended substantial changes to address the new requirements of PPS 25 as a result. Many of the changes incorporated in the revised policy were proposed by the EA.</p>

RSS Policy or reference	Comment
<p>Recommendation R8.5: Policy EM5 is amended as follows:</p> <p>Policy EM5 – Integrated Water Management</p> <p><i>In achieving integrated water management and delivery of the EU Water Framework Directive, plans and strategies should have regard to River Basin Management Plans, Water Company Asset Management Plans, Catchment Flood Management Plans, and the Regional Flood Risk Appraisal. Local planning authorities and developers should protect the quantity and quality of surface, ground and coastal waters, and manage flood risk, by:</i></p> <ul style="list-style-type: none"> ▪ <i>Working with the Water Companies and the Environment Agency when planning the location and phasing of development. Development should be located where there is spare capacity in the existing water supply and waste water treatment, sewer and strategic surface water mains capacity, insofar as this would be consistent with other planning objectives. Where this is not possible development must be phased so that new infrastructure capacity can be provided without environmental harm;</i> ▪ <i>Producing sub-regional or district level strategic flood risk assessments, guided by the Regional Flood Risk Appraisal. Allocations of land for development should comply with the sequential test in PPS25. Departures from this should only be proposed in exceptional cases where suitable land at lower risk of flooding is not available and the benefits of development outweigh the risks from flooding;</i> ▪ <i>Designing appropriate mitigation measures into the scheme, for any development which, exceptionally, must take place in current or future flood risk areas, to ensure it is protected to appropriate standards, provides suitable emergency access under flood conditions, and does not increase the risk of flooding elsewhere;</i> ▪ <i>Requiring new development, including residential, commercial and transport development, to incorporate sustainable drainage systems and water conservation and efficiency measures to the highest contemporary standard;</i> ▪ <i>Encouraging retrofitting of sustainable drainage systems and water efficiency within existing developments;</i> ▪ <i>Raising people’s awareness of flood risks (particularly for vulnerable groups) and the impacts of their behaviours and lifestyles on water consumption.</i> <p>SOS Response: Accept. Strengthens links between RSS and WDF. Emphasises issues of environmental capacity. Clarifies role of Regional Flood Risk Appraisal and application of sequential test in PPS25.</p>	<p>The revised policy is much more consistent with the requirements of PPS 25, and is a positive step in providing guidance for SFRA. However, the key issue is that the policy revision rests on the assumption that a RFRA will be completed before the RSS is published. If this work is not completed, the RSS policy will have to be altered accordingly. The lack of an RFRA has had a negative impact in terms of the preparation of the SFRA, in that it should be informing the preparation of the SFRA, not the other way round – this has created difficulties in terms of determining the appropriate level of data analysis and assessment for the Greater Manchester SFRA.</p>

RSS Policy or reference	Comment
<p>Paragraph 11.10 (Supporting text to Policy EM5)</p> <p><i>There is an imperative need to manage the demand for water in the region and address the detrimental effect of urban and agricultural run off on water quality. The region's current and future flood risks must also be managed in a sustainable way to avoid potential damage to property and even loss of life.</i></p> <p>Recommendation R8.4: That the flood zones risk map prepared by the EA should be included in the final version of RSS, accompanied by minor changes to the supporting text. Paragraph 11.10 to be briefly expanded to refer to the key elements of PPS25.</p> <p>SoS Response: Accept: Flood risk map included in RSS to provide improved clarity and context.</p>	<p>The Regional Assembly produced a short briefing note on Development and Flood Risk at the EiP, including a map showing the relationship between the main proposed development locations in the draft RSS and EA information on Flood Zones 3 and 2. The Panel recommended that this map should be included in the adopted RSS. It is hoped that any revisions to this map will take account of the findings of the SFRA, and the RFRA once prepared.</p>
<p>Paragraph 11.11</p> <p><i>Sustainable Drainage Systems represent one key mechanism for addressing these issues as they reduce the rate, quantity and improve the quality of surface water run off during rainfall events, minimising flooding and environmental damage as a result of uncontrolled surface run-off. Further guidance is provided in the North West Best Practice Design Guide, and within the Implementation Plan and Technical Annexes accompanying this RSS.</i></p>	<p>No changes proposed to this paragraph.</p>
<p>Part 4: Sub-regional Policy Frameworks R10.2 'Policy MCR1 Manchester City Region Priorities'</p> <p>Re-written, with the inclusion of the following relevant paragraph:</p> <p><i>Environmental resources should be focused where they are most needed and will have the greatest benefit, to facilitate the sustainable development of the Regional Centre and Inner Areas. This includes integrated flood management works, the remediation of contaminated land and provision of high quality green infrastructure as part of comprehensive regeneration schemes.</i></p> <p>SoS Response: Accept subject to slightly amend bullet point 9 to say “ focus environmental improvements” rather than “environmental resources should be focused”. SOS has also made a number of other minor alterations to reflect the new wording proposed in RDF1 which sets out the priorities for growth and the broad locations for development in the towns and cities.</p>	<p>This policy has been re-written to express that the priority for investment in flood management works should reflect the overall aim to direct development to the regional centre and inner areas. Such an approach is helpful.</p>

LOCAL POLICY GUIDANCE ON FLOOD RISK			LDF - DESTINATION
POLICY	SUMMARY	COMMENT	
BOLTON METROPOLITAN BOROUGH COUNCIL UDP (APRIL 2005)			
Policy R5 - Landscape Character			Core Strategy and Site Allocation DPD
Explanation of Policy N6 states:	The Council advises against culverts which may undermine flood defences.		
Policy EM10 - Surface Water Run-off	The Council Identifies surface water run-off as a viable cause of flooding and seeks to encourage proposals designed to minimise this effect. The council will impose conditions to ensure flood risk mitigations work and are maintained	Policy EM 11 represents the main flooding policy for the borough. In focusing on flood zones and flood plains and does not in it self consider the full range of causes such as surface water run-off and culverts, and issues such as climate change. However, these are captured within other polices.	Core Strategy
Policy EM11 - Flood Protection	Provides general presumption against development within flood zones or where development could increase the risk of flooding except where:- no adverse impact on the flood plain; development it will not itself be at risk from flooding; adequate provision is made for access existing or proposed flood defences are protected. Where necessary the council will request flood a risk assessments	Policy places responsibility on the developers to design and to mitigate against adverse effects.	Core Strategy and Site Allocations DPD
BURY METROPOLITAN BOROUGH COUNCIL UDP (1997)			
Policy EN5 - Flood Protection and Defence	The Council seeks to control development in a manner consistent with flood protection and maintenance of flood defence systems.	In spatial terms the policy is non specific, the Council would apply a generalised policy to protect flood defences.	Core Strategy
Policy EN5/1 - New Development and Flood Risk	The council would not permit new development that would be at risk of flooding and increase risk elsewhere or that would affect flood defences. Assessment criteria to include impact on flood plain; surface water run off; protect river flood defences. Seeks new development to incorporate mitigations.	Main flood risk protection policy which seeks to address the key sources of flood risk as outlined within guidance at that time. However, it does not outline instances for flood risk assessments.	Core Strategy
MANCHESTER CITY COUNCIL UDP			

LOCAL POLICY GUIDANCE ON FLOOD RISK			LDF - DESTINATION
POLICY	SUMMARY	COMMENT	
Policy DC1 Flood Risk Areas	Main flood risk protection policy - provides a generalised presumption against development which might be at risk of flooding or increase risk elsewhere	As a main flood risk policy it is fairly narrow in focus, failing to address the range of causes of flooding	Core Strategy
East Manchester Alterations (adopted Nov 2003) Policy EM2 – Design and Sustainable Urban Neighbourhoods	Intended to guide Development in East Manchester – intended to discourage develop at risk of flooding or that would increase risk elsewhere; and encourages the use of SUDS as means of mitigation	This policy is focused fairly narrowly, seeking to address only 100 year flooding. However, it requires developers to have regard to SUDS and PPG25.	
Sub Area 6 Ashton Canal Corridor EM10	Supplementary policy seeking to protect the flood plain between Holts Town and Ashton New Road	Supplementary policy seeking to protect the flood plain between Holts Town and Ashton New Road	
OLDHAM METROPOLITAN BOROUGH UDP (JULY 2006)			
Paragraph 13.45 states:	Cautions development away from locations at risk of flooding except where they incorporate safeguards and other uses would not be put at risk.		
Policy NR2.2 - Flooding and Flood Protection	Main flood risk protection policy – provides general presumption against development within flood zones or where development could increase the risk of flooding except where:- there is no adverse impact on the flood plain; development it will not itself be at risk itself from flooding; adequate provision is made for access d. existing or proposed flood defences are protected.	A standard response to PPG25 – focuses on designated flood zones and areas of localised flooding. This policy seeks to take a broader view of development and flood risk management by encouraging development to incorporate SUDS.	Core Strategy and Development Control Policies DPD, Site Allocations DPD and Proposals Map DPD
Policy NR2.3 - Protection of Open Watercourses	Seeks to prevent culverts to open water courses.	Identifies culverts to open water courses as a potential source of flooding	
NR2.4 - Surface Water Run-off and Sustainability	The Council will require developments to be designed as far as possible to minimise the surface water run-off.	Places the onus on development to reduce surface water run off. ,Seen as a group, these policies are wide ranging and seek to address key issues.	
ROCHDALE METROPOLITAN BOROUGH COUNCIL UDP (JUNE 2006)			

LOCAL POLICY GUIDANCE ON FLOOD RISK			LDF - DESTINATION
POLICY	SUMMARY	COMMENT	
General Strategy – Key Objectives: KO/4 – ‘Use Resources Prudently’	To protect important agricultural land, flood plains and mineral resources from development	<p>Policy EM/7 is the main flood risk protection policy. In focusing on flood zones and flood plains and does not consider the full range of flood sources or issues such as climate change.</p> <p>However, other policies do capture other flooding sources such as surface water run-off and culverts. This polices places responsibility on the developers to design to mitigate against adverse effects Provides it advocates flood risk assessments.</p>	
Policy G/8(A, B, C & D) Greenspace Corridors	Paragraph 14.25 states: It is also important to ensure that within river valley corridors, development and activities do not increase the risk of flooding or have an adverse impact on water quality.		
Part One Policy G/EM/1 - Environmental Protection and Pollution Control	This statement is intended to include the protection of flood plains		
Policy EM/7 - Development and Flood Risk	<p>Provides general presumption against development within flood zones or where development could increase the risk of flooding except where:-</p> <ul style="list-style-type: none"> a) no adverse impact on the flood plain; b) development it will not itself be at risk itself from flooding; c) adequate provision is made for access d) existing or proposed flood defences are protected. <p>Where necessary the council will request flood risk assessment.</p>		Development Control Policy Document, Area Action Plans and Proposals Map.
SALFORD CITY COUNCIL UDP 2004 –2016 (JUNE 2006)			
Policy LBC9 Flood Risk (Lower Broughton Design Code (SPD	This policy provides that planning application within the Lower Broughton Area should be accompanied by very comprehensive and prescriptive Flood Risk Assessment.	This policy takes the widest possible view of flooding, placing onus on development to act responsibly by incorporating sufficient attenuation and mitigation measures against flooding. Primarily these include SUDS.	Development Control Policy Document, Area Action Plans and Proposals Map.
Policy EN 19 - Flood Risk and Surface Water	<p>Presumption against development which would itself be subject to unacceptable flooding, could increase the risk of flooding, unless:-</p> <ul style="list-style-type: none"> e) accompanied by flood risk assessment f) identify mitigations taking into account development on adjoining land <p>Where risk can not be reduced development should satisfy appropriate elements of the RIFCS.</p>	The council’s main flood risk policy. The Council takes a wider view of flooding, its causes, effects and consequence. Promotes mitigations such as SUDS and would require flood risk assessment in certain instances.	
Policy EN 20 - River Irwell Flood Control	Presumption against development within high risk areas shown within proposals map.	Supplementary policy which seeks to discourage development which may harm this flood plain.	
STOCKPORT METROPOLITAN BOROUGH COUNCIL UDP			

LOCAL POLICY GUIDANCE ON FLOOD RISK			LDF - DESTINATION
POLICY	SUMMARY	COMMENT	
Policy EP1.7 Development and Flood Risk	<p>Provides general presumption against development within flood zones or where development could increase the risk of flooding except where:-</p> <ul style="list-style-type: none"> g) no adverse impact on the flood plain; h) development it will not itself be at risk itself from flooding; i) adequate provision is made for access j) existing or proposed flood defences are protected. k) no culverts l) no increase surface area run-off <p>Encourages the use of SUDS and that consideration is given to Government Guidance.</p>	<p>Policy EP 1.7 is the main flood risk protection policy and seeks to discourage development from flood plains and zones where development might itself be a risk of flooding or impact adversely on flood defences.</p> <p>There is no advice on instances for Flood Risk Assessment</p>	Core Strategy DPD
Para 5.36 Within "Areas at Risk from Extreme Flooding Events".	Covers emergency planning		
TAMESIDE METROPOLITAN BOROUGH COUNCIL UDP (NOV 2004)			
Policy N6 - Protection and Enhancement of Waterside Areas	<p>Presumption in favour of development provided it does not involve creating culverts and would not create new culverts</p> <p>Protects flood plain habitat</p>		Core Strategy , Site Allocations DPD & Development Control DPD
U4 Flood Prevention	<p>Identifies the need for a risk -based assessment to development based upon EA Flood Plain Maps.</p> <p>In full consultation with Environment Agency, the Council will undertake Sequential Testing, taking into account the nature and scale of development giving least priority to areas of high risk and undeveloped land.</p> <p>The Council will also give consideration to whether the developer is at risk and will increase the likelihood of flooding elsewhere or impact on flood defence.</p>	Broadly focused no specific design advice such as SUDS	
TRAFFORD METROPOLITAN BOROUGH COUNCIL (Revised UDP June 2006)			
Part I Policy ENV1 - Flood Risk	The Council will minimise flood risk by taking a precautionary approach to all new development in or affecting areas liable to flooding	<p>Main flood risk policy</p> <p>Provides a single approach to Flood Risk. It does not provide any varied advice on use of SUDS or the range of circumstances which can lead to flooding.</p>	Core Strategy DPD
Part I Policy ENV8 – River Valleys and Major Watercourses	The Council will develop the recreation, wildlife and leisure potential of the valleys and major watercourses in Trafford commensurate with landscape and wildlife interests, and, where appropriate, will seek to re-establish a countryside character in the Mersey and Bollin valleys.	Policy will have a direct impact on rivers and watercourses and their flood plains, so implementation of the policy may have an impact on flood risk.	Core Strategy DPD

LOCAL POLICY GUIDANCE ON FLOOD RISK			LDF - DESTINATION
POLICY	SUMMARY	COMMENT	
Part II Policy ENV13 – River Valley Floodplains	<p>The Council will only permit land-filling, land-raising or other development in flood plains, as shown on the Proposals Map, in wholly exceptional circumstances and where all the following criteria are satisfied;</p> <ul style="list-style-type: none"> i. It will not increase the risk of flooding, by reducing flood storage capacity, increasing flows within the floodplain or via the additional discharge of surface water; ii. It will not itself be at risk from flooding; iii. It will provide adequate access to watercourses for maintenance purposes; iv. It will allow for the protection of existing or proposed flood defences; v. It will not necessitate additional public expenditure on flood defence works. 	Policy seeks to ensure that development in the flood plain will not adversely affect flood risk	Core Strategy DPD
WIGAN METROPOLITAN BOROUGH COUNCIL UDP (APRIL 2006)			
R1B New Housing Sites	There is a presumption in favour of development provided are no insuperable physical or environmental constraints including flood risk.		
G1C Development and Flood Risk	<p>Development will not be permitted which would:-</p> <ul style="list-style-type: none"> a) Be subject to an unacceptable risk of flooding; b) Create an unacceptable increase in the risk of flooding, on-site or elsewhere; c) Adversely affect the water environment as a result of an increase in surface water run-off; d) Harm existing or proposed flood defences or interfere with flood control and maintenance works; e) Include the culverting of watercourses. <p>Also states: In addition, the culverting of watercourses as part of development schemes will not be permitted due to the adverse effects likely to be created to wildlife habitats as well as the increased risk of flooding due to blockages.</p>	Primary flood risk policy which takes account of the key issues set out in PPG 25.	