



Local Development Framework – Core Strategy

Issues and Options Discussion Paper

Topic Paper 7 – Development and Flood Risk

1.00 Background

- Planning Policy Statement 1: Delivering Sustainable Development
- Planning Policy Statement 1 Supplement: Planning and Climate Change
- Planning Policy Statement 25: Development and Flood Risk
- Planning Policy Statement 25: Development and Flood Risk – Practice Guide
- North West Regional Spatial Strategy
- Strategic Flood Risk Assessment for Greater Manchester
- Tameside MBC Level 1 Update and Level 2 Strategic Flood Risk Assessment.

1.01 Flooding from rivers is a natural process; shaping the natural environment. However it can also threaten life and damage property, of which there is several recently well documented examples across the country. Assessing flood risk stems from a European Directive to ensure that through the planning process a Sustainability Appraisal of all Development Plan Documents is undertaken.

1.02 The effects of design, location and land use through development decisions have profound impacts upon flood events. There is wide recognition that flooding and flood risk coupled with general changes in climate to milder and wetter winter conditions represents a risk that needs to be managed appropriately through development. This is to ensure that existing development in flood areas is not put at greater risk through further development and where development is approved in areas of risk, that it is appropriately flood proofed.

2.00 National Perspective

2.01 Planning Policy Statement 1 (PPS 1): Delivering sustainable development, states that all forms of flooding and their impact on both the natural and built environment are material planning considerations. Planning should facilitate and promote sustainable patterns of development, avoiding flood risk and accommodate the impacts of climate change. Through both PPS 1 and Planning Policy Statement 25 (PPS 25): Development and Flood Risk, it is recommended that risk is appraised, managed and reduced through the plan making and development process.

2.02 PPS 25 recommends that a hierarchical approach to flood risk assessments is undertaken starting at the regional level and working down to site specific Flood Risk Assessments. In line with this the guidance applicable to Tameside is the Regional Flood Risk Assessment, the Greater Manchester Strategic Flood Risk Assessment and the Tameside Strategic Flood Risk Assessment.



2.03 The PPS 25 approach is able to give a steer across local authority boundaries which is particularly important for issues in relation to flood risk. This is due to systems being hydrologically linked and not limited by political boundaries.

2.04 PPS 1 states that Development plan policies should take account of environmental issues:

‘the potential impact of the environment on proposed developments by avoiding new development in areas at risk of flooding and sea-level rise, and as far as possible, by accommodating natural hazards and the impacts of climate change’

2.05 PPS 25 states that authorities should prepare and implement planning strategies that help to deliver sustainable development by:

Appraising risk

- Identifying land at risk and the degree of flooding risk from river, sea and other sources in their areas.
- Preparing Regional Flood Risk Appraisals (RFRAs) or Strategic Flood Risk Assessments (SFRAs), as freestanding assessments that contribute to the Sustainability Appraisal of their plans.

Managing Risk

- Framing policies which steer development towards locations which avoid flood risk to people and property, and manage any residual risk, taking account of the impacts of climate change.
- Only permitting development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and benefits of the development outweigh the risks from flooding.

Reducing Risk

- Safeguarding land from development that is required for current and future flood management, e.g. conveyance and storage of flood water, and flood defences.
- Reducing flood risk to and from new development through location, layout, design and incorporating sustainable drainage systems (SUDS).
- Using opportunities offered by new development to reduce the causes and impacts of flooding through methods such as, surface water management plans, making the most of the benefits of green infrastructure for flood storage, conveyance and SUDS, re-creating functional floodplain and setting back defences.

2.06 These key planning objectives are adopted through a process of interpretation, with local polices reflecting these principles and utilising national, regional and local evidence to steer content.

3.00 Draft National Planning Policy Framework

3.01 It is important to note that the Government intends to replace the current suite of national planning policy statements and guidance described above and the North West Regional Spatial Strategy, with a single national planning document; the National Planning Policy Framework (NPPF). This document had a period of consultation in 2011 and is currently being reviewed (January 2012).

3.02 Whilst the current planning policy statements will remain in place until adoption of the NPPF, it is useful to be aware of its content as it will guide the policies in the Core Strategy.



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- 3.03 In relation to development and flood risk, the NPPF emphasises the Government's objectives that planning should take full account of flood risk. It says it should do this by avoiding inappropriate development in areas at risk of flooding and locating development in areas at lowest risk. Where this cannot be avoided the proposal must be made flood safe.
 - 3.04 It states that the Environment Agency should be involved in all stages of the planning and decision making processes in relation to flood risk. The NPPF highlights issues of mitigating, adapting, safeguarding, minimising and reducing in relation to flood risk, retaining both the "exception test" and the "sequential test" as currently detailed in PPS25.
 - 3.05 Greater emphasis is given to the relationship between flooding and climate change; and how land can be better managed to assist in adapting to climate change.
 - 3.06 However the NPPF provides less guidance and detail to Local Authorities in how to undertake local Flood Risk Assessments.

4.00 Regional Perspective

- 4.01 In response to existing national planning policy related to flood risk, sustainability and climate change (PPS1 and PPS25), the North West Development Agency through its Regional Spatial Strategy (RSS) established policies for flood risk, EM5 and EM6. These policies build upon the national direction in that they establish, through the Regional Flood Risk Assessment, broad areas of flood risk that should be investigated further through relevant sub-regional and local flood risk assessments.
- 4.02 Although the revocation of the RSS is impending, the NPPF retains the approach to managing flood risk through the planning system. Although it puts a greater emphasis upon flood risk and climate change, it does leave sub-regional and local strategic flood risk assessments unsupported with no RSS. As a result the Greater Manchester Strategic Flood Risk Assessment and the Tameside level two Strategic Flood Risk Assessment, (conducted in combination with Stockport MBC), carry greater local importance.

5.00 Local Perspective

Greater Manchester Strategic Flood Risk Assessment

- 5.01 The Greater Manchester Strategic Flood Risk Assessment (GM SFRA), conducted as level one of a two tier assessment process highlights Tameside as the gateway to the Peak District, which by its very nature means the Borough is in the upper portions of river catchments and where flooding from rivers is the primary issue. It notes that although this is due to its geography being more elevated than boroughs to the west of Manchester, flooding issues are short lived, with short times between peak rainfall and peak river flow, with risks occurring predominantly at river confluences and sections of culverted water courses.
- 5.02 As Tameside is located in the upper reaches of catchments, the Greater Manchester Strategic Flood Risk Assessment stresses the importance of sustainable urban drainage systems (SUDS) in controlling surface water and not exacerbating down stream issues through the development process. It also highlights the need to discuss development



pressures within existing flood zones and where future development may occur through the Core Strategy. Lastly the potential that land adjacent to rivers can play in flood water retention is also expressed as an important factor in being able to reduce down stream flood risk and provide a buffer in the system which would be particularly beneficial to neighbouring down river boroughs such as Stockport MBC.

- 5.03 The implications of the study were followed through into the second level study which as advised by the GM SFRA was undertaken in conjunction with Stockport MBC due to fluvial catchment reasons.

Tameside Strategic Flood Risk Assessment

- 5.04 Overall the Tameside SFRA states that flood risk for the Borough from all sources is generally low. Although the level one study highlighted that rivers are the principle source of flooding in Tameside, the lower level study for the borough indicates that in many cases the extent of flooding is contained within the river banks.
- 5.05 Where areas of flooding do extend beyond river banks the land is predominantly allocated as greenbelt through the Unitary Development Plan and therefore relatively property and people free, and protected from future development.
- 5.06 Other flood concerns relate to surface water and flooding from sewers. In both cases however data confidentiality, sensitivity and available detail led to a reduced overall confidence in any outcomes. Despite this it was advised that generally flooding from surface water is a localised issue typified by lower lying ground conditions. The Strategic Flood Risk Assessment will continually be reviewed and it is expected that data confidence in relation to surface water will improve as work is currently ongoing concerning the Greater Manchester Surface Water Management Plan with input from the Council.
- 5.07 Lastly the risk of flooding from canals and reservoir sources is considered low. Flood risk here is from overtopping which is considered to be low risk due to the regulated nature of the features involved although it is appreciated that flooding from a breach, depending on the source, could have profound implications.
- 5.08 Therefore from the above, the risk of flooding within the borough is considered low. The principle risk that does exist is in relation to main river water courses within the borough. Due to the topography of Tameside at the top of the river catchment, flooding of water courses and their tributaries tends occur rapidly after rainfall events with high but quick peak flows and water courses having the potential to carry debris.
- 5.09 This presents particular problems in that the time available to respond to incidents is relatively short. Therefore, the effective management and maintenance of culverts is important in reducing the risk of flooding. Although the geography of the borough presents risks, it also benefits from rivers being incised in nature, with generally enough bank height to retain flood events in most cases.
- 5.10 Due to the relatively low risk and river banks being able to contain most flood events, expected development zones within flood prone areas are considered able to afford development in most cases provided they are taken forward in accordance with PPS 25 and a flood appreciative design is followed.
- 5.11 All developments are expected to maximise the use of SUDS to aid in reducing the volume and speed at which water can enter the main river system. In addition to this, the study



advises that it may be appropriate in locations where development is expected or exists and suffers from river flooding that defences such as raised banks may be appropriate. To further reduce the risk of flooding the study suggests that it would be appropriate to enhance the existing green belt south of Hyde specifically for flood water retention. This would have added benefits in down river locations, reducing risk by storing peak flows and releasing the water back at a steady rate.

6.00 Summary

- 6.01 PPS 1 and PPS 25 outline how planning can help reduce flood risk through appropriate development. It is understood that climatic conditions are changing to warmer drier summers, warmer wetter winters and that extreme weather scenarios will occur with increased regularity.
- 6.02 Reducing flood risk has been part of the planning system for some time through PPS 25, however the importance of reducing flood risk has recently been recognised more widely by the Government through the Flood and Water Management Act 2010 and Tameside MBC being designated as a Lead Local Flood Authority which places greater responsibilities upon it to manage flood risk.
- 6.03 This increasing importance of flood risk management and additional responsibility will be recognised through appropriate planning policies based upon the evidence presented above to manage and reduce flood risk to support the Council with the responsibilities it has in relation to the above 2010 Act.

7.00 Key Issues

- 7.01 The flood risk potential for Tameside is generally considered low, although there are known areas that do experience flooding.
- 7.02 The main sources are fluvial in nature. Although the River Medlock skirts the North-West and River Etherow the South-East of Tameside the River Tame is the main river running through the Borough.
- 7.03 There are localised flood risks presented by surface water and drainage system capacity, although the current low confidence data levels means this information will be further refined through the Greater Manchester Surface Water Management Plan.
- 7.04 Despite the risk of fluvial flooding, the Tameside Strategic Flood Risk Assessment suggests that within existing flood prone areas that future development is acceptable provided it follow guidelines within PPS 25.
- 7.05 Flood Risk management options which are suggested for Tameside are the use of SUDS on all developments to minimise the effects of future construction, the implementation of on site flood defences such as raised embankments and more strategically areas of greenbelt south of Hyde for flood water retention.



8.00 Cross Cutting Themes

- 8.01 Issues surrounding development and Flood Risk inter-connect with a number of other topic areas including:
- 8.02 Housing & Economy and Employment – appropriately designed and located housing and employment premises remain important issues. Current and future land for housing and employment development, when within an area of flood risk, will have to consider the evidence within the Tameside Strategic Flood Risk Assessment in accordance with the guidance presented in PPS 25. Planning applications for development within areas of flooding must also prepare a site specific Flood Risk Assessment.
- 8.03 Transport and infrastructure – the evidence presented would suggest that the ability to retain flood waters on land already allocated as greenbelt would reduce the flood risk of the River Tame in down stream river locations, making it a more regulated system. This represents a potential piece of infrastructure to be delivered that would provide many benefits.