

Schedule of Representations – Flood Risk and Development Planning Guidance, Consultation Draft, July 2007

Representation: 76
Red Rose Forest Team

| Paragraph/Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendations |
|------------------|------------------------|--------------------|---|--|
| Whole document | Whole document | Observation | Flood waters work on a catchment level, not political boundaries. No mention has been made of The River Irwell Catchment Management Plan (EA 2006). Solutions to reducing flood risk in Salford may exist upstream outside Salford. This should be mentioned so not to exclude this option being considered. It may be that as with developer contributions for schools, open space etc, a sum to contribute to flood risk measures may be appropriate and these may be outside the authority area. | Response: Noted Recommendation: Insert following paragraph into Chapter 5: The Environment Agency (EA) is responsible for producing Catchment Flood Management Plans (CFMPs) which define long-term strategic policies for sustainable flood risk management across whole river catchments. The CFMPs identify the current flood risk management measures and characteristics of river catchments and make recommendations for the future management of flood risk taking into account changes to land uses and development, population growth and effects of climate change. Three CFMPs cover Salford, they are the River Irwell CFMP, Upper Mersey CFMP and Mersey Estuary CFMP. |

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| | | | | CFMPs are available on the EA website at www.environment-agency.gov.uk |
| Policy FRD5; Provision of Flood Storage Capacity With New Development | <p>New development (excluding householder development and non-residential extensions with a floor space of 250 square metres or less) in High Flood Risk Zone 3 should not result in a net loss of flood storage capacity.</p> <p>If ground levels on which new development is situated have to be raised, it will be necessary to lower ground levels either within the curtilage of the development or elsewhere in the floodplain, in order to maintain at least the same volume of flood storage capacity within the floodplain for the 1:100 year flood event (including an allowance for climate change).</p> | Observation | <p>Firstly the loss of flood storage capacity by raising ground levels is identified in Policy FRD 5. I understand that setting a threshold development size for such policies is standard practice. However multiple developments under 250 square metres will soon add up, decreasing flood storage capacity. In an ideal world a policy would be adopted whereby there is no net loss of storage capacity. This may mean reviewing the threshold size. Also in providing access/egress routes in Policy FRD 8, storage capacity would also be reduced but this has not been addressed.</p> | <p>Response: Noted</p> <p>It is noted that cumulatively, householder developments and non-residential extensions of 250 m2 or less could decrease flood storage capacity. However it would difficult to lower the threshold to require householder and non-residential extensions to provide compensatory flood storage because in most cases it would likely to be impracticable on small sites.</p> <p>It is noted and agreed that provision of access and egress routes can decrease flood storage capacity.</p> <p>Recommendation:</p> <p>Insert reference to Policy FRD8 in Policy FRD5 and clarify wording in FRD2.</p> |

**Representation: 33
GMPTE**

| Paragraph/Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | Other | Thank you for sending the above consultation to GMPTE. GMPTE have noted and reviewed this document and on this occasion have no comments to make. | No response. No recommendation. |

**Representation: 21
Highways Agency**

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | Other | In response, I can confirm that the Highways Agency has no comments to make on the content of this document. | No response. No recommendation. |

**Representation: 120
New Deal for Communities (NDC)**

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Para 5.6 | The Exception Test presents a series of criteria that new development, which is deemed essential to sustainable development, needs to satisfy to justify its location in High Flood Risk Zone 3. | Support with Conditions | <p>New Deal supports the Draft Planning Guidance on Flood Risk and Development - particularly as significant parts of Charlestown and Lower Kersal are high flood risk areas.</p> <p>I would, however, request that the guidance elaborates more on what is meant by the "Exception Test" (paragraph 5.6). More specifically, what are the exact criteria that new development in High Flood Risk Zone 3 areas need to satisfy?</p> | <p>Response:</p> <p>Note support for document and agree to provide more information of the Exception Test.</p> <p>Recommendation:</p> <p>Insert following in Chapter 5, para 5.6:</p> <p>For the Exception Test to be passed:</p> <p>(a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk;</p> <p>(b) the development should be on developable previously-developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously-developed land: and</p> <p>(c) a Flood Risk Assessment (FRA) must demonstrate that the development will be safe, without increasing flood risk elsewhere, and where possible, reduce flood risk overall.</p> |

Representation: 13
United Utilities

| Paragraph/ Policy | Paragraph/Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Para 2.10 | 2.10 Development will not be permitted unless adequate provision is made for the discharge of foul and surface water associated with the proposal. | Support | United Utilities supports the wording that 'development will not be permitted unless adequate provision is made for the discharge of foul and surface water associated with the proposal'. We are very happy to advise the Council or Developers on this aspect. | Response: Support noted. Recommendation: No changes to be made. |
| Para 3.1 | The policies contained within this planning guidance are applicable to new development in High Flood Risk Zone 3 and Medium Flood Risk Zone 2 of the city, which are equivalent to the land covered by the Environment Agency's indicative 1:100 year and 1:1000 year floodplain maps respectively shown on Map1 in Appendix A. The Guidance is also applicable to new development of 1ha or above in Low Flood Risk Zone 1 which is equivalent to the rest of Salford outside Zones 2 and 3 and to new development proposed in areas that in the past have experienced sewer and surface water drainage flooding identified on Map 3 in Appendix A. | Observation | The wording in paragraph 2.3 specifically states 'that the risks of flooding are not increased elsewhere as a result of new development'. In reading paragraph 3.1, it is not clear that the risks of flooding elsewhere should be considered and perhaps this needs making clear? | Response: Noted. To clarify, the risks of flood elsewhere in paragraph 2.3 refer to ensuring that proposed development does not increase flood risk onto surrounding 3rd party land. Whilst, 3.1 identifies whereabouts in Salford the planning guidance is applicable to. There is no relationship between the two paragraphs. Recommendation: No changes to be made. |

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| Para 4.4 | Lower Kersal sits in a meander loop of the River Irwell and is at a relatively low elevation compared to the surrounding land. The area is afforded some degree of protection by the presence of raised flood defences along the riverbank and the flood storage basin at Littleton Road, which raises the level of protection to a 1:75 year standard. | Observation | These areas are said to be protected to a 1:75 year standard. Apart from raising floor levels as specified in policies within the document is there an intention to improve general protection to a 1:100 year standard? | <p>Response: Noted.</p> <p>The creation of a second flood storage basin at Castle Irwell would increase flood defence protection to a 1:100 year standard. However, funding for the second storage basin is yet to be resolved.</p> <p>Recommendation:</p> <p>No changes to be made.</p> |
| Para 4.8 | There are approximately 1,000 properties across the city that are affected by sewer and surface water drainage flooding which usually takes place from rapid runoff after heavy rainfall in the summer months. Areas in Higher Broughton, Ellesmere Park, Swinton, Boothstown, Walkden and Little Hulton have the highest risk of this type of flooding. | Objection | United Utilities object to sewer and surface water drainage flooding being linked together in this way. It implies that they are linked and result from the same inadequacies, which is not the case. Again the "trouble spots" map does not identify all areas where there are inadequacies in the sewer system and therefore gives the impression that if you are not in one of these areas then everything is ok. | <p>Response:</p> <p>Objection to paragraph noted and agree to amend text.</p> <p>It is noted that there are other areas at risk of sewer flooding and/or surface water drainage outside areas identified on Map 3 and planning guidance should be amended to indicate this.</p> <p>Recommendation:</p> <p>Amend para 4.9 to read:</p> <p>There are approximately 1,000 properties across Salford that are affected by sewer flooding and/or</p> |

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| | | | | <p>surface water drainage flooding. Surface water drainage flooding usually takes place from rapid runoff after heavy rainfall in the summer months.</p> <p>It is important to note that Map 3 only shows areas where there are the highest concentration of incidences of sewer flooding and surface water drainage flooding. There will be other areas that suffer from these types of flooding outside the areas identified on Map 3.</p> |
| Para 4.9 | In addition, the sewer system servicing Lower Broughton is dependent upon combined sewer overflows (CSOs) that spill into the River Irwell. When the river is at a high level, the combined sewer (including sewage) is unable to discharge into the river and backs up into the sewer network. Low lying properties are at risk of flooding, as there is limited spare capacity in the sewerage network to store the backed up sewage. | Observation | The problem of "locking" of outfalls will apply to others areas as well as Lower Broughton | <p>Response: observation noted.</p> <p>Recommendations:</p> <p>No changes to be made.</p> |
| Para 6.2 | Before embarking on a FRA, a developer should contact the Environment Agency (EA) to discuss the scope and content of the FRA and to find out what existing information is already available for use in the FRA e.g. | Other | United Utilities would suggest that wording be added that makes it clear that an FRA from the developer must present a balanced and sustainable view for the | <p>Response:</p> <p>Accepted</p> <p>Recommendation:</p> |

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| | flood levels and flood models. | | disposal of surface water (including that which currently drains to combined sewers) with sustainable drainage systems preferred as a means of disposal. | Add the following text to list item 7 of para 6.4: ' How will surface water run-off be disposed from the site in the most sustainable manner?' |
| Para 6.39 | <p>The city council encourages the use of Sustainable Drainage Systems (SUDS) for the disposal of surface water from new development. A range of SUDS techniques are available which aim to mimic natural drainage processes and manage surface water as close to its source as possible:</p> <ul style="list-style-type: none"> • Porous materials - such as permeable concrete blocks, crushed stone and porous asphalt can be used for pavements, driveways and car parks. They encourage rainwater to infiltrate into the ground. • Infiltration trenches and soakaways – are stone-filled trenches which promote the slow movement of surface water into the ground. They can be effective for draining highways and are able to remove water pollutants by absorption, filtering and | Observation | <p>United Utilities recognizes that there is a lot of interest in grey water recycling and/or rainwater harvesting. A lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use.</p> <p>We would, however endorse the collection of rainwater for watering plants in gardens.</p> | <p>Response: Noted</p> <p>It is understood that there is a distinction between rainwater recycling and re-use of grey water. Harvested rainwater can be recycled and can be used to flush toilets, urinals and for use in the garden. Whereas grey water recycling includes water from baths, showers and hand basins. It is understood that grey water needs treatment before use. The planning guidance only makes reference to rainwater harvesting.</p> <p>Recommendation:</p> <p>Remove reference to taps in para 6.44.</p> |

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| | <p>microbial decomposition in the surrounding soil.</p> <ul style="list-style-type: none"> • Rainwater harvesting systems – collect rainwater from roofs for it to be used for flushing toilets, urinals, taps and for watering plants in gardens. • Ponds and wetlands – are designed to attenuate surface water by storing peak flows and releasing to the sewer network or watercourse at a controlled rate during and after the peak flow has passed. | | | |
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**Representation: 121
Environment Agency**

| Paragraph/ Policy | Paragraph/Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | Other | The document refers to the piper-networking site in several places. It may be more appropriate to have a chapter | Response: Accepted. |

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| | | | within the document which details our flood risk standing advice and when it should be used. | Recommendation: Insert new chapter 7 which outlines consultation arrangements with the Environment Agency. |
| Para 2.9 | Where development would be subject to a significant flood risk, including on allocated sites, and it is not possible to reduce the risk to an acceptable level through design solutions or other measures secured through the development, it will be allowed to proceed only in co-ordination with the completion of those elements of the River Irwell Flood Control Scheme which are necessary to mitigate the identified risk satisfactorily. | Observation | The paragraph suggests a reliance on further works to the River Irwell flood control scheme to provide the desired minimum standard of protection. Although the Lower Irwell Strategy has considered options that would achieve this, they may not be implemented. A precautionary stance should be taken in such circumstances and if required, an objection to inappropriate development should be sustained. | Response: Noted Recommendation: No changes to be made. |
| Para 4.7 | Approximately 3,500 properties are at risk of flooding from smaller watercourses elsewhere in the city: including Worsley Brook affecting parts of Walkden, Winton and Worsley; Salteye brook affecting parts of Peel Green and Barton; Platt's Brook and the River Irwell (old course) affecting parts of Irlam; Glaze Brook affecting parts of Cadishead and; Shaw Brook affecting the area north of Worsley Moss. | Observation | The watercourses named as COWs in this paragraph are "Main River" except the Irwell (old course) in Irlam. | Response: Noted Recommendation: Remove reference to Critical Ordinary Watercourses and replace with 'smaller watercourses' in para 4.7 |
| Policy FRD2: | Householder developments and non- | Other | Policy FRD 2 – Flood Risk | Response: |

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| <p>Flood Risk Management in Householder Developments and Non-Residential Extensions with a floor space of 250 square metres or Less.</p> | <p>residential extensions with a floor space of 250 square metres or less proposed in High Flood Risk Zone 3 and Medium Flood Risk Zone 2 should be designed and built so that either:</p> <p>a) New floor levels will be set no lower than existing levels and flood proofing and resilience measures have been incorporated where practicable to the predicted flood level for the 1:1,000 year flood event;</p> <p>or;</p> <p>b) New floor levels will as a minimum, be set at least 300mm above the flood level predicted for the 1:100 year flood event.</p> | | <p>Management in householder Developments and Non-Residential Extensions</p> <p>For a small extension the applicant is unlikely to have the means to determine the 1 in 1000 year flood level and the Environment Agency may not be able to provide this either. Maybe the specified return period could be omitted in section (a) as in the flood risk matrix guidance.</p> | <p>Accepted</p> <p>Recommendation:</p> <p>Remove reference to the 1:1000 year flood level in the wording of Policy FRD2 and its reasoned justification in para 6.11.</p> |
| <p>Para 6.11</p> | <p>For development proposals in the floodplain of the River Irwell, the City of Salford Strategic Flood Risk Assessment (SFRA) can be used to gain a preliminary understanding of the predicted depths of flooding a site may face. Developers should contact the Environment Agency (EA) to obtain site specific flood levels.</p> | <p>Observation</p> | <p>The Environment Agency may not be able to provide flood levels for design purposes at specific sites. Therefore this could be misleading.</p> | <p>Response:</p> <p>Accepted</p> <p>Recommendation:</p> <p>Remove reference to site specific levels and replace with 'to find out what information is available to determine site specific levels'.</p> |

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| <p>Para 6.13</p> | <p>Freeboard is a safety margin taking into account uncertainties in hydraulic modelling. The EA normally requires a standard 600mm freeboard to be added to the predicted flood water level, as well as an allowance for climate change. However a lesser amount may be agreed with the EA where it can be demonstrated that the standard requirement is not necessary via more refined modelling in the Flood Risk Assessment (FRA).</p> | <p>Other</p> | <p>Policy FRD 4 – Floor Levels in New Residential Development</p> <p>We would like to suggest an alternative wording for this:-</p> <p>Floor levels shall be set so that there would be no more than 600mm depth of flooding to habitable rooms in a 1 in 1000 year event or,</p> <p>be no lower than the 1 in 100 year (including climate change and an appropriate freeboard), whichever is the highest.</p> <p>It is worth pointing out that the 1 in 1000 year less 600mm criteria could be lower or higher than the 1 in 100 plus climate change depending on the circumstances.</p> | <p>Response:</p> <p>Noted</p> <p>Recommendation:</p> <p>The view has been taken that the existing wording of Policy FRD4 has the same desired effect as the Environment Agency's suggested rewording for Policy FRD4. Therefore, there should be no changes to the wording of the policy. It is recommended that words be added to the reason justification to make developers aware that in some cases the 1:1000 year flood level minus 600mm could be below the 1:100 year flood level. In this case habitable room floor levels should be set to the highest level out of the two.</p> |
| <p>Para 6.16</p> | <p>Habitable rooms are living rooms, principal dining areas and bedrooms within houses and flats. It does not include:- kitchens, bathrooms, utility rooms, studies or box rooms. Kitchen areas may be considered habitable depending on their function within the household.</p> | <p>Other</p> | <p>The Environment Agency would encourage kitchens to be considered as habitable rooms. They are used all the time and in the event of flooding affecting a kitchen, substantial damages would result. They are generally built using fitted units and appliances which could not be</p> | <p>Response:</p> <p>Accepted.</p> <p>In some circumstances kitchen areas can be considered as habitable depending on their function with the household. It is accepted that kitchens are</p> |

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| | | | <p>moved to higher levels. Consequently, they are likely to be one of the most expensive rooms to re-fit following flooding (it would be interesting to know what insurance companies would make of kitchens not being considered 'habitable rooms', given recent events). Is there a case for making the argument that non-habitable rooms should be limited to garages and external utility areas?</p> | <p>likely to be expensive to re-fit following a flood.</p> <p>Recommendation:</p> <p>Amend the working of policy FRD4 and its Reasoned Justification to include Kitchens.</p> |
| <p>Policy FRD6: Protection of Flood Flow Routes</p> | <p>New development in High Flood Risk Zone 3 (excluding householder development and non-residential extensions with a floor space of 250 square metres or less) should not have an unacceptable impact on the effectiveness of known linear flood flow routes. Where possible, new development should seek to enhance the effectiveness of flood flow routes and/or be designed to allow permeability to the through flow of water.</p> | <p>Other</p> | <p>With regards to the above policy we would ask how the flood flow routes will be identified, also what procedure will be put in place to recognise when they will be impacted. I.e. will planning officers have access to maps which indicate flow routes?</p> | <p>Response:</p> <p>Noted.</p> <p>At present the only flood flow routes the SFRA has specifically identified are Lower Broughton Road, Great Clowes Street and Clarence Street. It is hoped that once we have a more detailed understanding of the flooding from other rivers in Salford, flood flow routes will be identified for these rivers. In some situations flood flow routes may only become apparent from the submission of a developer Flood Risk Assessment (FRA) for a specific site.</p> |

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| | | | | <p>At the site specific level a developers FRA will be an important source of information to recognise where flood flow routes could be impacted by proposed developments</p> <p>Recommendation:</p> <p>No changes to be made.</p> |
| <p>Policy FRD 8 - Provision of safe access</p> | <p>New development (excluding householder developments and non-residential extensions with a floor space of 250 square metres or less) proposed in High Flood Risk Zone 3 should provide safe access and egress routes that are signposted.</p> | <p>Other</p> | <p>As part of the explanation of the policy, in line with the Environment Agency's own current guidance, any proposed evacuation route must be considered safe and should remain dry during the design flood event.</p> | <p>Response:</p> <p>Noted.</p> <p>It is agreed that wherever possible, access and egress routes should be dry. However, whether the design of a new development is able to incorporate dry evacuation routes is very much dependent on the particulars of the site and the surrounding area. As a consequence it may not be practicable for new developments to incorporate dry evacuation routes in all cases.</p> <p>Recommendation:</p> <p>No changes to be made.</p> |

Representation: 122
North West Regional Assembly

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | Support | <p>The NWRA support the aims of this document and due to recent events the need for such guidance is essential. From a planning perspective we need to ensure that we have a strategic approach when protecting the North West region from flooding. Policy EM5 – (Integrated water management) in Submitted Draft RSS illustrates this importance.</p> <p>The NWRA supports this guidance; it is an important step in ensuring the development of flood management within Salford, taking forward such guidance helps with the decisions on planning applications in terms of future flooding.</p> <p>We were pleased that different sources of flooding are mentioned throughout the guidance; as the interpretation of PPS 25 is increasingly based on river flooding, we need to ensure that plans have a strategic approach to flooding and incorporate the management of various flooding sources for example sewer flooding.</p> | <p>Response:</p> <p>Support noted.</p> <p>Recommendation:</p> <p>No changes to be made.</p> |
| Whole document | Whole document | Other | <p>Submitted Draft RSS Policy EM5 Integrated water management states that plans and strategies should have regard to River Basin management plans and assist in achieving integrated water management and delivery of the Water Framework Directive. We should ensure that we protect the quality and quantity of different water sources including surface, ground, and coastal waters to manage flood risk.</p> <p>The key elements are to -</p> <ul style="list-style-type: none"> • Phase development to reflect existing water supply, waste etc... | <p>Response:</p> <p>Noted.</p> <p>Recommendation:</p> <p>No changes to be made</p> |

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| | | <ul style="list-style-type: none">• Implement the sequential flood risk test• Requiring that development that must take place in future flood risk areas is resilient to flooding.• Requiring new development to contains SUDs.• And importantly raise people's awareness of flood risk and the impacts of their behaviour and lifestyle on water consumption. <p>The Salford flood risk guidance should aim to meet all of these key elements so we can ensure we develop in areas that are low risk from future flooding.</p> | |
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**Representation: 31
GONW**

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | Other | <p>Apart from saying, as we have done below, that this document should be promoted as SPD in line with Regulation 6 we do not wish to make any further comments on the informal planning guidance. To promote it as SPD you would need to include it in the LDS in the first instance.</p> <p>I'm surprised that you are not taking it forward as SPD, given that it has links back to the UDP, as it would carry more weight than an informal planning document and wouldn't take much more time to produce. More importantly, Regulation 6 of the Town and Country Planning (Local Development)(England) Regulations 2004 gives a description of documents which must be specified as LDDs in a local development scheme - see attached. The flood risk planning guidance document would seem to be such a document. My advice is that you should therefore include it in the LDS and promote it as SPD.</p> | <p>Response:</p> <p>Noted</p> <p>The planning guidance will not form part of Salford's Local Development Framework, but as adopted council policy will be a material planning consideration in the determination of planning applications.</p> <p>It was not considered appropriate to produce the planning guidance as a statutory supplementary planning document (SPD) due to the large amount of time and resources needed to produce such a SPD and the other priorities in the Local Development Scheme.</p> <p>However following the completion of the AGMA Sub Regional Flood Risk Assessment, the guidance will be reviewed and a view taken as to whether to promote it as a SPD in the Local Development Scheme.</p> <p>Recommendation:</p> <p>No changes to be made</p> |

Representation: 123
Natural England

| Paragraph/ Policy | Paragraph/Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Para 5.13 | Policies on reducing flood risk through design and use of Sustainable Drainage Systems (SUDS) are also likely to feature in the forthcoming Design SPD and Sustainable Design and Construction SPD (due to be adopted in March 2008). | Support | We support the principles of sustainable design and construction, including sustainable drainage systems, in which surface water drainage systems mimic the operation of natural drainage systems. We therefore support the references to these in paragraph 5.13 and 6.39, and Policy FRD 11. We note, and welcome, that sustainable drainage will also be covered in the forthcoming SPDs on 'Design' and 'Sustainable Design and Construction'. | Response: Support noted. Recommendations: No changes to be made. |
| FRD 5: Provision of Flood Storage Capacity within New Development. | <p>New development (excluding householder development and non-residential extensions with a floor space of 250 square metres or less) in High Flood Risk Zone 3 should not result in a net loss of flood storage capacity.</p> <p>If ground levels on which new development is situated have to be raised, it will be necessary to lower ground levels either within the curtilage of the development or elsewhere in the floodplain, in order to maintain at least the same volume</p> | Support | In particular, in relation to Policy FRD 5 we support the principle embodied in the policy that new development should not result in a net loss of flood storage capacity. Paragraph 6.19 acknowledges that areas of amenity and open space within and around developments can play a vital role in helping to maintain flood storage capacity. Additional green space can also enhance flood storage capacity. | Response: Noted Recommendation: No changes to be made. |

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| | of flood storage capacity within the floodplain for the 1:100 year flood event (including an allowance for climate change). | | | |
| Para 6.23 | Where other flood flow routes in the floodplains across Salford are identified, they too should be protected from obstruction and/or development designed in such a way as to allow their permeability to the through flow of water. | Observation | Policy FRD 6 and paragraph 6.23 concern flood flow routes, and paragraph 6.23 stipulates that where additional flood flow routes are identified these should be kept clear of development. Such routes may have an additional role as green infrastructure, and may give rise to opportunities to create or maintain a network of green infrastructure within areas liable to flooding. | Response: Noted and agree that in some instances flood flow routes can have an additional role as green infrastructure. Recommendation: Insert new para 6.24 to support dual use of flood flow routes for green infrastructure where practicable. |
| Para 6.39 | The city council encourages the use of Sustainable Drainage Systems (SUDS) for the disposal of surface water from new development. A range of SUDS techniques are available which aim to mimic natural drainage processes and manage surface water as close to its source as possible. | Observation | Green infrastructure has an important role within sustainable drainage, as well as offering other advantages. Paragraph 6.39 specifically makes reference to ponds and wetlands as part of sustainable surface water drainage. Of course, these also have value for biodiversity and landscape or townscape, and should be designed and maintained with this in mind as well as their value in dealing with surface water. | Response: Support Noted. Agree role of attenuation ponds in enhancing biodiversity. Recommendation: Add wording to para 6.44 to encourage developers to design attenuation ponds to enhance biodiversity. |

**Representation: 71
The Theatres Trust**

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | | We do not have any particular comment to make on the document. | Response: None Recommendations: None |

**Representation: 124
Countryside Properties**

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Officer's Recommendation |
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| Front cover | Front cover | Other | Would it be possible at the next stage to change the image on the front of the Flood SPD? Given it shows nearly all our regeneration site (& Millers!) under water I think it portrays a negative image and could serve to blight the area. | Response: Accept. Recommendation: Change front cover of Flood Risk and Development Planning Guidance. |

Representation: 125
Central Salford Urban Regeneration Company

| Paragraph/Policy | Paragraph/Policy Text | Nature of Response | Response / Representation | Council Response and Recommendation |
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| Whole document | Whole document | Observation | This Planning Guidance will have significant implications relating to the delivery of the Central Salford Vision and Regeneration Framework and it is important that these implications are fully understood. | Response: Noted Recommendation: No changes to be made. |
| Para 3.3 | Satisfying the policies in this draft planning guidance is not a reason for poor urban, architectural and landscape design. Proposals for new development will still need to satisfy the design policies in the City of Salford Unitary Development Plan (UDP). | Support | We note that the Draft Planning Guidance acknowledges the tension between the incorporation of flood risk mitigation measures within new development and the realisation of urban design objectives, particularly with regard to securing active frontages at ground floor level and positive overlooking at street level. We agree that this is a key issue and welcome the references that satisfying the policies within the Planning Guidance will not be a justification for poor design, and that the design policies of the UDP will still be a key consideration. | Response: Support noted. Recommendations: No changes to be made. |
| Map1: Flood Risk | Map1: Flood Risk Zones, | Observation | Our understanding was that the | Response: Noted. |

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| Zones, Appendix A | Appendix A | | <p>area of high flood risk was not as extensive as is identified at Map 1. The mapping which the Environment Agency made available to Broadway Malyan to input to the Irwell City Park Design Framework specifically identified the south bank of the River between the Meadows and the Exchange Greengate area as being of a lower flood risk than those areas of Lower Broughton which lie clearly within High Flood Risk Zone 3.</p> | <p>The floodplain maps that appear in Appendix A are based on EA indicative maps and should be used as a starting point. They do not take account of topography and presence of flood defences. The more detailed modelled floodplain maps produced for the SFRA indicate that the High Flood Risk Zone is less extensive when compared to the indicative floodplain maps similar to floodplain mapping for the Irwell City Park. It is accepted that the indicative maps could be misleading.</p> <p>Recommendation:</p> <p>Insert text to Map 1, Appendix A to make it clear that the map only shows the indicative floodplain and that developers should use the maps in the SFRA to gain a more detailed understanding of the extent of flood risk from the River Irwell.</p> |
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Representation: 126
Urban Vision

| Paragraph/ Policy | Paragraph/ Policy Text | Nature of Response | Response / Representation | Officer's Recommendation |
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| Whole document | Whole document | Other | <p>Need to highlight the issue of all types of flooding and that the applicant needs to discuss with me, they do get advice at DTA and planning and building regs. you need to see new planning application form which gives good advice.</p> <p>Areas which flood are not necessarily shown on EA maps which only show potential watercourse flooding. applicants are advised to seek pre planning advice from Salford city council engineers- see DTA on UV website.</p> | <p>Response: Noted.</p> <p>Recommendation:</p> <p>Insert text to inform developers of the situations in which they need to consult Urban Vision drainage engineers in Chapter 7: Determination of Planning Applications.</p> |
| Para 4.7 | <p>Approximately 3,500 properties are at risk of flooding from smaller watercourses elsewhere in the city: including Worsley Brook affecting parts of Walkden, Winton and Worsley; Salteye brook affecting parts of Peel Green and Barton; Platt's Brook and the River Irwell (old course) affecting parts of Irlam; Glaze Brook affecting parts of Cadishead and; Shaw Brook affecting the area north of Worsley Moss.</p> | Other | <p>suggested amending paragraph to read as follows - approximately 3,500 properties are at risk of flooding from smaller watercourses elsewhere in the city: including Worsley Brook catchment – which includes Whittle Brook, Kempnough Brook, Wardley Brook, how Clough Brook and Linnyslaw Brook affecting parts of Walkden, Winton and Worsley; salteye brook and folly brook affecting parts of</p> | <p>Response: Accept.</p> <p>Recommendation:</p> <p>Amend para 4.7 to include comments.</p> |

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| | | | Peel Green and Barton; Platt's Brook and the River Irwell (old course) affecting parts of Irlam; Glaze Brook affecting parts of Cadishead and; its tributaries Shaw Brook affecting the area north of Worsley Moss and Ellenbrook/ Stirrup Brook. all cows were enmained in 2005 by the environment agency who are now land drainage authority, but Salford City Council remain responsible for assets as riparian owner | |
| Policy FRD1: Flood Risk Assessments | <p>A Flood Risk Assessment will be required to accompany planning applications for:</p> <ul style="list-style-type: none"> i. any development proposals in High Flood Risk Zone 3; ii. any development proposals in Medium Flood Risk Zone 2; or iii. any operational development proposals of 1ha or above in Low Flood Risk Zone 1, <p>that are considered likely to be at risk of flooding or increase the risk of flooding elsewhere.</p> | Other | <p>suggested amending policy frd1 to read as follows -</p> <p>a flood risk assessment will be required to accompany planning applications for:</p> <ul style="list-style-type: none"> i.any development proposals in high flood risk zone 3;(less than 1 in 100year standard of protection) ii.any development proposals in medium flood risk zone 2; or (less than 1in 1000 but better than 1in 100) iii.any operational development proposals of 1ha or above in low flood risk zone 1, (above 1in 1000) <p>that are considered likely to be at risk of flooding or increase the risk of</p> | <p>Response: Noted</p> <p>It is agreed that the document should clearly state the definitions of the various flood risk zones. However its felt that this information is best presented in the Glossary, not in the wording of Policy FRD1.</p> <p>Recommendation:</p> <p>Insert the definition of High, Medium and Low Flood Risk Zones into the Glossary in Appendix B.</p> |

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| | <p>The Flood Risk Assessment should:</p> <ul style="list-style-type: none"> i. identify and assess the risks of all forms of flooding to and resulting from the development, taking into account climate change; ii. demonstrate how the risk of flooding will be managed; iii. demonstrate that the development complies with the policies contained in this planning guidance; and iv. include an Emergency Planning Statement detailing flood warning and evacuation measures, where applicable. | | <p>flooding elsewhere.</p> <p>The Flood Risk Assessment should:</p> <ul style="list-style-type: none"> i. identify and assess the risks of all forms of flooding to and resulting from the development, taking into account climate change; ii. demonstrate how the risk of flooding will be managed; iii. demonstrate that the development complies with the policies contained in this planning guidance; and iv. include an Emergency Planning Statement detailing flood warning and evacuation measures, where applicable. (river flooding only) | |
| Policy FRD2: Flood Risk Management in | Householder developments and non-residential extensions with a floor space of 250 square metres or less proposed in High Flood Risk Zone 3 and Medium Flood Risk | Other | Suggested including the following text in Policy FRD2 - need to include that all basements should not drain direct to sewer due to the likelihood of | Response: Accept. Recommendation: |

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| <p>Householder Developments and Non-Residential Extensions with a Floor Space of 250 square metres or Less</p> | <p>Zone 2 should be designed and built so that either:</p> <p>a) New floor levels will be set no lower than existing levels and flood proofing and resilience measures have been incorporated where practicable to the predicted flood level for the 1:1,000 year flood event;</p> <p>or;</p> <p>b) New floor levels will as a minimum, be set at least 300mm above the flood level predicted for the 1:100 year flood event.</p> | | <p>surcharge and back flow , so all drains from basements should be pumped system. seals on toilets / non return valves do not always work.</p> | <p>Amend text to para 6.30 include comments.</p> |
| <p>Para 6.26</p> | <p>It is important that in the event of an any flood up to a 1:1,000 year event, damage to buildings is minimised as far as possible by using flood resilient materials and construction techniques that reduce the consequences of flooding and facilitate recovery from the effects of flooding sooner than buildings that use conventional construction methods. Flood resilience can be achieved, for example, by:</p> <ul style="list-style-type: none"> • Using solid rather than suspended floors; • Using treated timber to resist water logging, and/or marine plywood for shelves and fittings; • Fitting electric, gas and phone | <p>Other</p> | <p>suggested making reference to the following - need to include that all basements should not drain direct to sewer due to the likelihood of surcharge and back flow , so all drains from basements should be pumped system. seals on toilets / non return valves do not always work.</p> | <p>Response: Accept</p> <p>Recommendation:</p> <p>Amend text to para 6.30 include comments.</p> |

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| | <p>circuits above expected flood levels;</p> <ul style="list-style-type: none"> • Fitting one-way auto-seal valves on WCs; • Using water-resistant alternatives to traditional plaster or plaster-boarding for internal wall finishes; • Avoiding the use of chip board or MDF; • Concentrating living accommodation on the upper floors; and • Avoiding fitted carpets. | | | |
| Para 7.1 | <p>Where flood risk is a material consideration, the city council will seek the advice of the Environment Agency (EA) before determining a planning application. For householder development and non-residential extensions with a floor space of 250 square metres or less (see Policy FRD2) consultation with the EA will be made using Environment Agency Standing Advice Development and Flood Risk – England, available at http://www.pipernetworking.com/floodrisk/index.html</p> | Other | <p>suggested amending paragraph to read the following - where main river flood risk is a material consideration, the city council will seek the advice of the environment agency (ea) before determining a planning application myself for all other types of flooding for householder development and non-residential extensions with a floor space of 250 square metres or less (see policy frd2) consultation with the ea will be made using environment agency standing advice development and flood risk – England, available at http://www.pipernetworking.com/floodrisk/index.html.</p> | <p>Response: Accept in part.</p> <p>Recommendation:</p> <p>Amend text to include comments in new Chapter 7: Determination of Planning Applications.</p> |