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# 10. Water, Flooding and Drainage

# Introduction

- 10.1. Flooding, drainage, and water use are key issues for local residents and businesses across Trafford. Effective water management is essential in protecting homes, infrastructure and livelihoods from the impacts of flooding. The need to protect against flooding and build resilience is heightened by the impact of climate change on future weather.
- 10.2. This chapter sets out the Council's approach to managing both the risk that flooding may pose to new development and any impact new development may have on local drainage and waterways. Policies will also promote sustainable drainage systems (SuDS), safeguard natural flood storage areas, and ensure water efficiency.

## **Corporate Plan Priorities**



# Policy Exclusions from the Local Plan

10.3. The Local Plan needs to be read alongside Places for Everyone (PfE) and national policy / guidance. Policy requirements which are adequately covered by other existing policies have, where possible, not been duplicated in the Local Plan. This includes policies in the Sustainable and Resilient chapter.



## Managing Flood Risk

#### Policy WA1: Managing Flood Risk

- A. The Council will manage development in areas at risk of flooding, having regard to the vulnerability of the proposed use and the levels of risk from all sources. This will involve, where necessary, a sequential approach and the application of the exception test.
- B. No development shall take place in Flood Zone 3b (Functional flood plain) except in limited exceptional circumstances, such as for essential infrastructure, which must still be required to pass the Exception Test, or for water compatible uses. Development must neither impede the flow of water within Flood Zone 3b nor reduce the volume available for the storage of floodwater.
- C. Applicants will be required to demonstrate, where necessary by a Flood Risk Assessment (FRA), that account has been taken of existing and future flood risk from all sources, as identified in the Strategic Flood Risk Assessment (SFRA), and having regard to climate change. A site-specific FRA is required where a development proposal is:
- i. In High Probability (Flood Zone 3)
- ii. In Medium Probability (Flood Zone 2)
- iii. On sites of 1ha or above within Low Probability (Flood Zone 1)
- iv. On sites of 0.5ha, or above with Critical Drainage Areas as identified in the SFRA
- v. Within Canal Hazard Zones or where flood risk from canals is overwise considered to be an issue as identified in the SFRA.
- D. Development must incorporate flood mitigation and management measures appropriate to the use and location. Such measures will be required to:
- i. Improve water efficiency
- Reduce surface water runoff using Sustainable Drainage Systems (SuDS); and



- iii. Designing the measures in accordance with the hierarchy of drainage options.
- E. Development adjacent to waterways will only be permitted where it can be demonstrated that it would not adversely impact upon the structural integrity of the waterway or its related infrastructure.
- F. Applicants will be required to use alternatives to culverting and reopen existing culverts in the design and delivery of new development.

Places for Everyone Links Policy JP-S2; and JP-S4. Relevant Strategic Objectives SO3 and S07

- 10.4. Trafford has an extensive network of main rivers, ordinary watercourses, canals and other water bodies. Sustainable water management has an important role in terms of reducing flood risk and ensuring that development does not cause any deterioration in the status of inland waters, as required by the European Union Water Framework Directive.
- 10.5. As part of the preparation of PfE, an updated Level 1 Strategic Flood Risk Assessment (SFRA) for Greater Manchester was produced (2019). This document provides an overview of flood risk in the sub-region. A further Level 2/Hybrid SFRA for Greater Manchester was completed in 2020. For most sources of flooding, the Level 2/Hybrid SFRA for Greater Manchester, is a useful source of information and replaces earlier assessments.
- 10.6. The Manchester, Salford and Trafford Level 2/Hybrid Strategic Flood Risk Assessment (SFRA) was completed in 2010 / 2011. The Level 2 / Hybrid SFRA for Manchester, Salford and Trafford remains a useful source of information for flooding from some sources, particularly groundwater and canals. It defined Critical Drainage Areas (CDAs) as currently understood in Trafford.



- 10.7. Evidence from the most up-to-date SFRA has been used to assist in applying the Sequential and Exception tests to identify locations for development in the Local Plan and will be used to assist in determining planning applications.
- 10.8. The Council's preference is for new development proposals to be located outside of Flood Zones 2 and 3, taking into account latest climate change allowances. Development proposals outside of Flood Zone 1, which require a sequential test will apply an area of search, to be agreed with the Local Planning Authority in advance of undertaking the search.
- 10.9. Flood Zone 3b, described as the functional flood plain, has been mapped as part of the Level 2/Hybrid SFRA for Greater Manchester (2020). Land falling within Flood Zone 3b will be safeguarded from development and forms part of the borough's Green Infrastructure network.
- 10.10. When undertaking site-specific flood risk assessments regard should be had to the latest Environment Agency peak rainfall allowances in the climate change allowances: flood risk assessments. This is important to understand and manage the effects of climate change on surface water flood risk and informing the design of drainage systems for new development.
- 10.11. CDAs are identified from historical flood events and/ or modelled data as having a significant risk from surface water flooding and include drainage catchments for the sewer network. The CDAs in Trafford were identified in the 2011 SFRA.
- 10.12. Working with natural processes should be used, as far as practicable to mitigate flood risk and deliver multi-functional benefits. The SFRA identifies measures which can be used such as tree planting and run-off attenuation features.
- 10.13. Culverting of watercourses has several potential adverse impacts on flood risk and water management, due to the risk of blockage, limited access for maintenance purposes and wider impacts on the environment. The Council will support schemes that facilitate future maintenance works of



the watercourses, enhance their health and contribute towards wider flood alleviation schemes.

- 10.14. In developing its strategic policies for flood risk and water management, the Council has had regard to the Environment Agency's North West River Basin Management Plan and relevant Catchment Flood Management Plans. Recognising the close hydrological and functional links with neighbouring authorities, the Council will also continue to work with the Greater Manchester Combined Authority, other districts, the Environment Agency, United Utilities and other stakeholders on a range of other water and flood management studies and strategies.
- 10.15. Effective engagement with developers, early in the planning application process, will be a key element in designing safe and sustainable development to ensure that the objectives of this policy are met. Early discussions should take place with the LLFA and where required the Environment Agency and United Utilities.

#### **Consultation Question 10-1**

Do you support Policy WA1? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.



## Sustainable Drainage

# Policy WA2: Sustainable Drainage – Surface and Foul Water

- A. All major developments must be supported by a site-specific drainage strategy or statement. Surface water must be discharged in the following order of the surface water hierarchy:
- i. into the ground (infiltration), then
- ii. to a surface water body, then
- iii. to a surface water sewer, highway drain, or another drainage system; and only then
- iv. to a combined sewer.
- B. Proposals must be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site. Such designs will be required to be integrated with the landscaped environment and the strategy for biodiversity net gain.
- C. Developments on greenfield sites will be required to achieve greenfield run off rates.
- D. Developments on brownfield sites must achieve greenfield run off rates wherever possible, particularly within Critical Drainage Areas. A relaxation on outflow controls and/or the extent of attenuation storage will only be permitted with the written agreement of the LLFA and the LPA at an early stage of an application/proposal. The rate of discharge will not be permitted to exceed the rate of discharge for the development prior to the redevelopment for that event. Applicants must submit clear evidence of existing operational connections from the site with associated calculations on rates of discharge to demonstrate any reduction that deviate from achieving greenfield runoff rates.



- E. Applicants must consider site topography, naturally occurring flow paths, ephemeral watercourses (where watercourses may only flow temporarily) and any low-lying areas where water naturally accumulates. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Resultant layouts must take account of such circumstances to ensure a flood resilient design is achieved and water is not deflected or constricted.
- F. For any development proposal which is part of a wider development or allocation, a site-specific drainage strategy or statement must be part of a holistic site-wide drainage strategy. Pumped drainage systems must be avoided wherever possible. The proliferation of pumping stations on a phased development, will not be acceptable.
- G. The Council also supports retrofitting SuDS in existing developments to improve water management.
- H. Impermeable surfaces in gardens or landscaped areas will not be allowed unless they contribute to managing surface water runoff effectively.
- Applicants for major development must engage with United Utilities or relevant water authorities early in the planning process to assess the need for infrastructure upgrades or improvements. New developments should make provisions for connection to the mains foul water network where available.
- J. Proposals which are likely to result in contaminants entering formal surface or foul water drainage systems will not be permitted, without the express consent of the asset owner.

Places for Everyone Links Policy JP-S2; and JP-S4. Relevant Strategic Objectives SO3 and SO7



- 10.16. The Council is committed to ensuring that all development within the borough is supported by adequate surface and foul water drainage systems, which protect public health, safeguard the environment, and contribute to sustainable growth. This policy aims to regulate and manage foul water infrastructure, minimise flooding risks, and encourage environmentally responsible practices in all new developments.
- 10.17. The application of the hierarchy for managing surface water is a key requirement for development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted by applicants to demonstrate why alternative and more preferable options in the surface water hierarchy are not available.
- 10.18. The preference of the Council is that all new developments and major redevelopments, incorporate Sustainable Drainage Systems (SuDS) to manage surface water runoff. This can include measures such as rainwater harvesting, permeable surfaces, green roofs, and other natural SuDS features that enhance biodiversity and water quality simultaneously. Only where these options are not feasible should discharge to public surface water or combined sewers be considered.
- 10.19. Foul and surface water must be considered early in the design process. Sustainable drainage should be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, including retrofit SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.
- 10.20. Drainage details, ground levels and finished floor levels are critical to ensure that proposals are resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor



level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connections to the receiving sewer.

- 10.21. Holistic site-wide drainage strategies will be required to ensure a coordinated approach to drainage between phases and developers, particularly where this is likely to occur over several years. Applicants must demonstrate how the approach to drainage on any phase or parcel of development within a larger site will connect into and support the site-wide strategy and/or infrastructure to enable and accommodate interconnecting phases. Where necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase(s). The strategy shall demonstrate communication with infrastructure providers and outline how each phase interacts with other phases.
- 10.22. Applicants are expected to provide information on their sustainable drainage proposals in the following documents:
  - a) Completed SuDS Pro-forma which assists in confirming approach;
  - b) Drainage strategy or statement which takes account of the recommendations from the site-specific flood risk assessment where applicable; and where necessary
  - c) A site-specific flood risk assessment
- 10.23. Where a site-specific flood risk assessment is required, this can be combined with the drainage strategy or statement.



#### **Consultation Question 10-2**

Do you support Policy WA2? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

# **Flood Storage Areas**

#### **Policy WA3: Flood Storage Areas**

- A. The Council will safeguard the following strategic areas for flood management from development, which will be identified on the Policies Map:
- i. Sale Water Park Flood Storage Area
- ii. Timperley Flood Storage Area
- B. Within, and adjacent to, these areas sustainable development will only be supported where:
- It will not have an adverse impact on the functioning of these areas for flood management;
- ii. It will not itself be at an unacceptable risk from flooding; and
- iii. It will provide adequate access for maintenance purposes.

Places for Everyone Links Policy JP-S2; and JP-S4. Relevant Strategic Objectives SO3 and SO7

10.24. There are currently two flood management areas within Trafford, located at Sale Water Park and the Salisbury Road Playing Fields in Timperley. Both areas are used for the purpose of flood storage and are operated by the Environment Agency. The boundaries of these areas will be shown on the Policies Map.



- 10.25. Development within or adjacent to areas used for flood management can have a negative impact on their proper functioning, for example by reducing the ability of flood waters to be stored naturally in times of flood and increasing runoff downstream or in adjacent areas. Development within or adjacent to flood management areas can itself be at unacceptable risk from flooding, such as through inadequate access and lack of provision for emergency evacuation.
- 10.26. Development also needs to allow for adequate access to flood management areas for the purpose of maintenance, such as the proper operation of sluices and other infrastructure.

#### **Consultation Question 10-3**

Do you support Policy WA3? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

#### Water Efficiency

#### **Policy WA4: Water Efficiency**

- A. All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.
- B. All major non-residential development must incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the Local Planning Authority. The BREEAM 'Very Good' standard must be met as a minimum.

#### **Places for Everyone Links**



Policy JP-S2; and JP-S4. **Relevant Strategic Objectives** SO3 and SO7

- 10.27. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Building Regulations currently include a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (I/p/d). In 2015 an 'optional' requirement of 110 I/p/d for new residential development was introduced.
- 10.28. The Local Plan proposes to use this higher standard, which ties in with the Council's approach to be a greener borough and declaring a climate emergency, and Greater Manchester declaring a biodiversity emergency. Pressures from water supply also affect the achievement of the Water Framework Directives through impacts on water quality, species and habitats. As such there are environmental reasons for addressing water efficiency as well as helping residents achieve lower bills in new housing.

#### **Consultation Question 10-4**

Do you support Policy WA4? Are there any changes required which would improve the policy? Please provide any supporting evidence which you think is relevant.

#### Monitoring

- 10.29. Table 12.1 of Places for Everyone (PfE) sets out a monitoring framework for the water, flooding and drainage related policies within that plan. Key indicators include the following:
- 10.30. The Local Plan will not replicate the above PfE monitoring indicators. The following additional indicators have been identified to monitor the delivery of the Local Plan Water, Flooding and Drainage policies.



Indicator	Target
Number of new developments where agreed with the council incorporating Sustainable Drainage System (SUDS) to Ciria standard.	Increase.
Water Framework Directive status of all waterbodies in the borough.	Increase.

#### **Consultation Question 10-5**

The Local Plan should be read alongside the Places for Everyone Plan and national policy / guidance. Where possible, the Local Plan has not repeated or duplicated policy.

However, are there any policy areas related to this chapter which you consider are missing and which should be included in the Local Plan?