

## Policy 37

### Id No Respondent

95 English Nature,

### Policy 37

Propose insert new paragraph at end of policy:

"Strategies. Plans and programmes should facilitate a coordinated and strategic approach to flood risk management as part of Green Infrastructure Plans, by supporting the creative enhancement of water courses for recreation and biodiversity in ways that benefit flood storage capacity (e.g.. multi-functional wetlands)"

Reason: to integrate the flood risk policy with green infrastructure planning.

200 Environment Agency

3.112

Good link between flood risk management and land management and hence to climate change.

3.113

In this paragraph, the RSS could highlight opportunities to provide additional areas of high value coastal wildlife habitats, for example, along the North Northumberland Coast in the Lindisfarne area and the Tees Estuary, which are key areas for the managed realignment of existing sea defences. Washland creation in the Till, Tyne and Wear river valleys could also be mentioned.

3.117

There could be an opportunity here to enhance water resources through joined up thinking with flood storage schemes.

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We generally support this policy, but it is weakened by the use of 'should' rather than 'shall' or 'will'. It is interesting that the similar policy in draft RSS 14 for the East of England says 'will'. We also think that the policy points could be reordered more logically, as we suggest below.

"d) Be informed by Strategic Flood Risk Assessments, prepared by planning authorities in liaison with the Environment Agency" - This should be in the starting text, before c).

Point f) "avoid development in functional floodplains...." should be moved up to c).

f) to h) – Good to see, although lessened by the fact that they are only 'additional issues' to take account of.

Point j) is a last resort.

163 Friends of the Earth North East

Friends of the Earth supports this policy. We would like to see an additional point added on maximising the potential for biodiversity in the floodplain, which as well as being valuable in its own right can also serve to reduce flood risk

329 Friends of the Earth South Tyneside

South Tyneside Friends of the Earth broadly supports this policy. We would like to see an additional point added on maximising the potential for biodiversity in the floodplain, which as well as being valuable in its own right can also serve to reduce flood risk.

8 Gateshead Council

Policy 37 and para 3.114 - The Environment Agency's and local authorities' roles in commissioning and co-ordinating Strategic Flood Risk Assessments (SFRA) should be clarified. Given the expertise of the Environment agency, it would seem unreasonable for it not to take a lead

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		role. In the co-ordination of large SFRAs such as that for Tyne and Wear, which would involve a large number of authorities.
160	Highways Agency	Adopt a strategic, integrated, sustainable and pro active approach to catchment management to reduce flood risk within the region. Ensure that new development is located in appropriate locations and LPA's should liaise closely with the Environment Agency .
459	Member of Public	I broadly support this policy, however a small change is required to the opening sentence to be consistent with Policy 36 and the UK's commitment to the 2002 EU Recommendation on Integrated Coastal Zone Management:
449	National Trust North East	<p data-bbox="672 406 2047 438">"Strategies, plans and programmes should adopt a strategic, integrated, sustainable and proactive approach to catchment management and in coastal zones ICZM to reduce flood risk within the region, managing risk from</p> <p data-bbox="672 446 2047 478">The Trust supports this policy, but would request that the wording be changed in some areas to strengthen it.</p> <p data-bbox="672 486 2047 518">In particular, f) should delete "avoid development in.." and insert "ensure that no development takes place in..."</p> <p data-bbox="672 526 2047 558">The Trust has already requested at the Pre-Consultation Draft stage that these changes be made, but the Assembly response was that it would make the policy "too rigid". The National Trust feels that flooding and climate change are very important issues, and there is a need for rigidity on the issue of flooding. There must be no development in functional floodplains, as this would inevitably cause problems elsewhere. A rigid approach is needed in this instance. Given the number of recent flooding incidences in the region, we are sure that this view would be supported by many.</p>
256	North East Wildlife Trust	<p data-bbox="672 750 2047 782">A more holistic approach to water resource management and flood alleviation is needed here instead of the rather narrowly focused policy expressed at present.</p> <p data-bbox="672 798 2047 829">In particular, the policy must be strengthened to reduce potential upstream developments that may increase flooding and there should be explicit encouragement of environmental management to reduce flood risk downstream.</p> <p data-bbox="672 845 2047 877">Specifically, the current wording allows a possible loophole for continued floodplain development. Floodplain development is unsustainable and should not be encouraged in any form.</p>
338	Northumberland Tyne & Wear NHS	Health protection effects noted.
124	South Tyneside Council	This adds little to national policy in PPG25. It would be better if the policy looked at Environment Agency flood risk data and stated where regional priority areas for tackling flood risk are
151	Sunderland ARC	Flood Risk is supported
148	Tees Valley Regeneration	<p data-bbox="672 1133 2047 1165">We refer to our earlier comments reproduced here. It is important to recognise that mitigation works involved in the regeneration (and in our opinion appropriate development) of some areas (for example, Middlehaven) can effectively remove not only the subject site, but wider areas from the flood plain resulting in improved environmental, social and economic conditions without adverse downstream impacts. Planning Policy Guidance Note 25 – Development and Flood Risk (PPG25) refers to such schemes in areas affected by flooding, as follows:</p> <p data-bbox="672 1173 2047 1204">"where the effects of flooding cannot be adequately mitigated, locate development in areas of least flood risk."</p>

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Policy 37 is generally acceptable, but still stops short of embracing our point about adequate mitigation rendering a proposal acceptable.

105    Tynedale Council

This sets out the approach regarding development on flood plains. This contentious issue needs clearer policies to prevent future development on flood plains. These policy objectives may not be stated strongly enough to resist ongoing development in flood risk sites.