

Places for Everyone Representation 2021

<b>Family Name</b>	Ellis
<b>Given Name</b>	Matthew
<b>Company / Organisation</b>	Environment Agency
<b>Person ID</b>	1286764
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Ellis
<b>Given Name</b>	Matthew
<b>Company / Organisation</b>	Environment Agency
<b>Person ID</b>	1286764
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Overall our position is that we consider the plan sound for matters within our remit.</p> <p>With regards to the evidence base, whilst we have no specific comments regarding the Strategic Flood Risk Assessment documents we would note that there has been a recent change in national climate change guidance and allowances which were published in July 2021.</p> <p>The Level 1 SFRA document refers to this change but the allowances the assessment is based on is behind current guidance. For the Greater Manchester SFRA, the modelled 1 in 100 AEP event +70% flood outlines have been screened against the sites, where they are available; 70% being the 'upper end' allowance in the previous guidance.</p> <p>The updated (July 2021) guidance and allowances is based on more localised catchments and for the Greater Manchester authorities the upper end allowances are now between 75-90%. However, the current SFRA assessments should still represent a reasonable reflection of risks when compared against the updated climate change guidance (July 2021) and is an appropriate approach based on the evidence available at the time.</p>