

Introducing Accountability of Societal Risk from Major Hazard Sites into the Spatial Planning System

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1 INTRODUCING ACCOUNTABILITY OF SOCIETAL RISK FROM MAJOR HAZARD SITES INTO THE PLANNING SYSTEM

1.1 INTRODUCTION

This report explores how the HSE can best influence the planning policy process and how practically this can be achieved. To inform the outcomes of this process it will be necessary for HSE to provide overarching guidance to Local Planning Authorities (LPAs) on how to deal with Major Hazard Sites as part of the spatial planning process. This report explores the possible form of this HSE national Good Practice Guidance and deals with a number of specific points raised by HSE, expanding on our original advice of 17th June 2009 on how they might best influence the spatial planning process in respect of societal risk.

The remit of the HSE covers England, Scotland and Wales. Any Good Practice Guidance will need to reflect this geographical coverage and differing legislative and regulative regimes. The principle of introducing practices to deal with Major Hazard Sites within the spatial planning process is transferable across England, Scotland and Wales as all the planning regimes and systems are focused on promoting sustainable development through spatial planning from the national and regional down to the local policy level. Whilst the HSE Good Practice Guidance would require different terminology across the three legislative regimes and policy frameworks, the approach taken will be generic across all three planning systems. In order to not unduly complicate this report, it refers in the main to the English planning system and national planning policies and frameworks at this stage. Where there are any substantive differences in the Welsh and Scottish systems and regimes these are described.

1.2 INTRODUCTION TO THE SPATIAL PLANNING SYSTEM

The Planning and Compulsory Purchase Act 2004 is the primary legislation in England and Wales that requires the planning system to take a strategic policy making approach. In Scotland it is The Town and Country Planning Act (Scotland) 1997 and the Scottish Planning Act 2006. The legislative frameworks require a proactive approach to spatial planning at regional and local levels. LPAs are required to devise a strategy for local development, setting out a spatial framework for at least 15 years based upon a sound evidence base.

The policy development process requires LPAs to shape development to reflect local circumstances, providing an opportunity for organisations such as the HSE, to influence the development process in a proactive way. This approach also provides an opportunity to strengthen collaboration between

the HSE and LPAs to plan development in areas where there are Major Hazard Sites.

In Scotland and Wales, LPAs produce one local development plan policy document, comprising of a Written Statement and detailed policies, supported by a Proposals Map showing the spatial distribution of land use allocations and strategic planning and environmental constraints. In England, LPAs produce a suite of Development Planning Documents (DPDs), which must include a Core Strategy and an Allocations DPD as part of their Local Development Framework (LDF). The Core Strategy deals with strategic planning policy and broad spatial considerations whilst the Allocations DPD covers specific land use allocations supported by a Proposals Map. Plan periods are for 15 years but are subject to a review every five years in England and Scotland, and four years in Wales. In England, the Allocations DPD is where the HSE can best influence the spatial planning process in terms of societal risk and in dealing with Major Hazard Sites.

2 DEALING WITH MAJOR HAZARD SITES AS PART OF THE SPATIAL PLANNING PROCESS

2.1 THE NATIONAL POLICY FRAMEWORK

Planning legislation embodies the principle of development plan led planning, supported by national policy guidance for LPAs, setting out the principles and requirements for local planning policy development. This sets the framework for the development plan process in each of the planning regimes.

In England, **Planning Policy Statement 12: Local Spatial Planning** (2008) sets out what the key ingredients of local spatial plans are and the key Government policies on how they should be prepared. It should be taken into account by LPAs in preparing DPDs and other local development documents. Similar advice is provided in **Planning Policy Wales** (2002) and **National Planning Framework for Scotland** (2004) and **Scottish Government Planning Policy, Parts 1, 2 and 3** (2008).

In England, HSE should be focussing their attention on helping to develop the Allocations DPD, as the Core Strategy deals with strategic policy and broad spatial choices. In Scotland and Wales there is still only one development plan document and hence only one production process. Key interventions in the policy development process are detailed in **Section 3**.

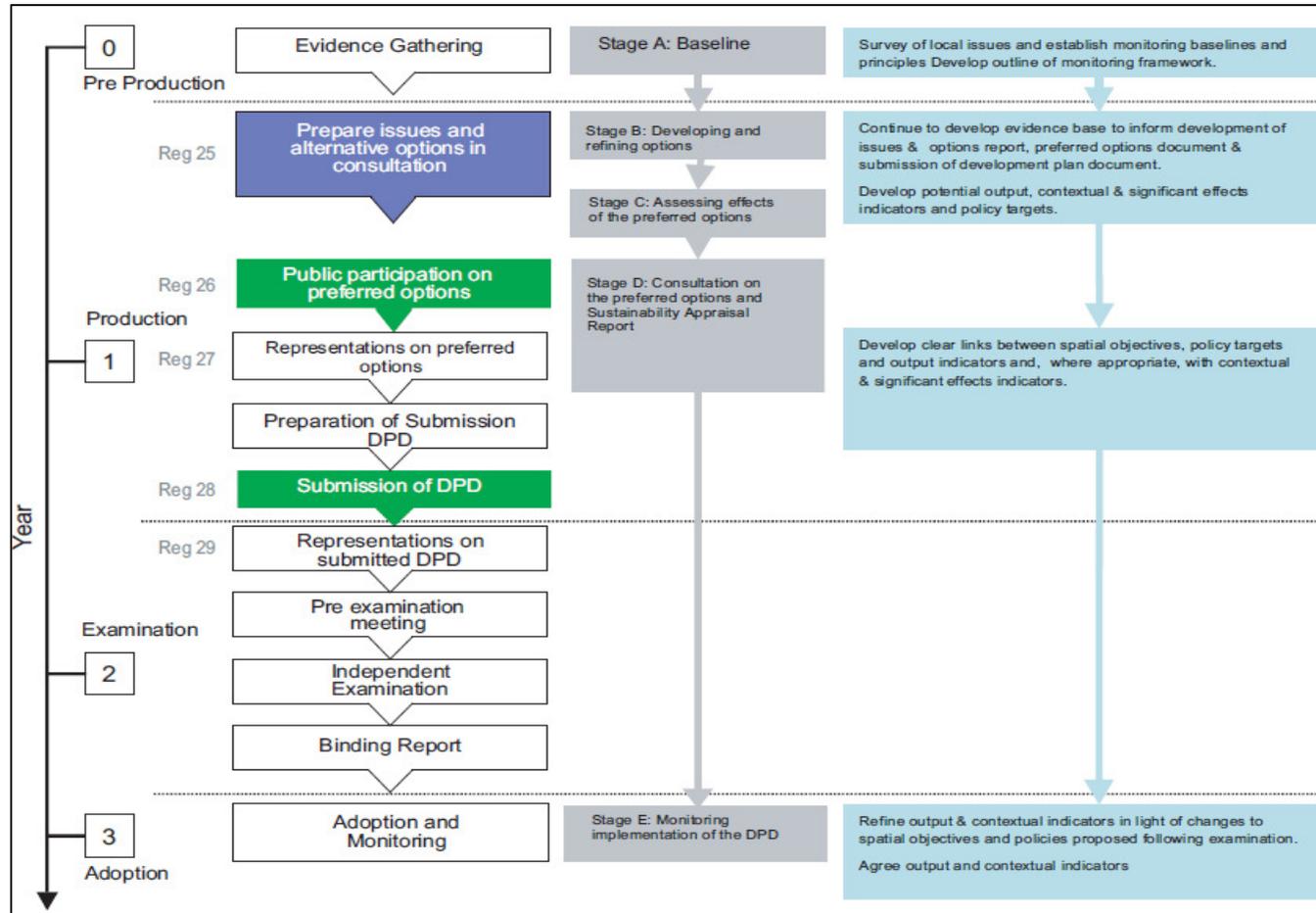
2.2 PARTICIPATION IN THE PLANNING PROCESS

Participation and consultation are essential parts of the planning system. LPAs are actively encouraged to explore and exploit opportunities for joint working and inclusive consultation. LPAs should engage with interested parties and key stakeholders early in the process.

Within the development plan process there are formal procedures for consultation. **Figure 2.1** shows where, during the various stages of the development plan production, consultation is statutorily required, in respect of the development of LDFs in England. Similar formal consultation requirements are also contained in the Welsh and Scottish systems.

Consultation should be an on-going part of policy development, though there are key stages where formal consultation takes place. Firstly at the Issues and Alternative options stage, any representations made at this stage will then feed into the production and development of the Preferred Options. There is further opportunity for consultation on the release of the Preferred Options Report, and Representation made on this will feed into the preparation of the development plan. Following submission of the development plan further representations can be made before the development plan goes through Examination in Public.

Figure 2.1 Development Plan Document Preparation in England



Source: PPS12

Development plans are subject to rigorous procedures of consultation and independent examination. In England, for example, Statements of Community Involvement (SCI) are produced by LPAs which sets out how and when the LPA intends to consult local communities and key stakeholders during the policy making process. Every SCI must provide for open access to information, and actively encourage the contribution of ideas and representations from the community.

In identifying key stakeholders and undertaking joint working and collaborative practices, the ongoing process of consultation can be simplified and result in more meaningful outputs through established relationships. There is a strong emphasis on early engagement with key stakeholders in the planning process which helps to 'scope out' unrealistic policy options at an early stage. Risk is one of many issues that need to be considered to ensure that there are no regulatory barriers to the delivery and implementation of the plan.

There is a joint onus on LPAs and key stakeholders, such as the HSE, to engage in '*timely and effective*' discussions. The creation of 'risk forums' would be an appropriate vehicle to ensure effective inputs and interventions in the planning system by HSE. Detailed consideration of the most appropriate forms and timing of intervention by the HSE in the planning process is given in **Section 3**.

2.2.1 The Formation of Risk Forums

The proposed risk forums would bring together key stakeholders to support the work of LPAs in key topic areas is established practice within the planning system. LPAs routinely work as part of joint agency partnerships, for example economic development forums and climate change partnerships. A risk forum mirrors both established good practice and the ethos of effective engagement with other stakeholder organisations. In relation to Major Hazard Sites and the development of risk forums, stakeholders may include:

- regulatory agencies (HSE);
- social infrastructure delivery agencies (the emergency services and primary care trusts);
- local authorities (including representatives from the development plan emergency planning teams and the County where it is the hazardous substances authority. Where there is the potential for cross-boundary impacts, representatives from neighbouring authorities should also be involved); and
- operators of Major Hazard Sites.

2.2.2 Cross Boundary Working

Local Authorities are encouraged to explore and exploit opportunities for cross boundary joint working. It is acknowledged that many issues critical to spatial planning do not respect local planning authority boundaries and that discussions may be more effectively and efficiently carried out by considering a larger spatial area. In circumstances where the impact of Major Hazard Sites on spatial development affects more than one local authority it will be feasible to produce joint evidence and widen the risk forum to embrace cross-boundary working. Depending on the nature and location of the risk sites consideration could be given to a sub-regional risk forum. These sub-regional forums or partnerships are an established model within the planning system for dealing with cross-boundary issues.

2.2.3 When a Major Hazard Site Needs to be Considered Through the Spatial Planning Process

Major Hazard Sites are considered to be those that require Hazardous Substances Consent under the Planning (Hazardous Substances) Act 1990 and accompanying Regulations. The Scottish equivalent is the Planning (Hazardous Substances) (Scotland) Act 1997.

There are approximately 1,800 subject to land use planning controls in the UK but priority in terms of spatial planning is to be given by the HSE to around 60 Major Hazard Sites where risk is considered to be higher. As a shorthand, we refer to these as 'priority societal risk sites' in this report.

The parameters and the trigger points used to select these priority societal risk sites and the rationale behind having what will effectively be a two tiered approach to dealing with Major Hazard Sites will need to be fully understood by LPAs. HSE will need to be proactive in getting this message across to LPAs at an early stage in the process.

We feel it is entirely sensible and appropriate to focus on these priority societal risk sites and target advice to the relevant LPAs. We are of the strong opinion that any approach HSE adopts should be targeted in the areas where it has the most relevance and its value would be most easily recognised.

3 WHEN TO MAKE KEY INTERVENTIONS IN THE DEVELOPMENT PLANNING PROCESS

3.1 INTRODUCTION

HSE needs to be able to sell the advantages of considering the spatial planning implications of priority societal risk sites as part of the development plan process. This will be one of the key functions of the Good Practice Guidance.

The onus should be on the HSE to notify the relevant LPAs that there is a higher tier risk site within their authority and set out HSE's protocols and procedures, in the form of the Good Practice Guidance, for dealing with them through the spatial planning process. Once a higher tier risk site has been identified, the HSE will need work in collaboration with the relevant local authority and key stakeholders to influence the formulation of the development plan.

Box 3.1: The Environment Agency: An Example of Good Practice

The work of the Environment Agency with regards to flood risk assessment is a useful comparison in terms of the level of support provided to LPAs in terms of policy formation. The Environment Agency provides planning resources, data and technical advice on dealing with flood risk through the spatial planning process. The Strategic Flood Risk Assessment undertaken by the Environment Agency forms part of the plan's evidence base. This is a national dataset underpinned by strategic modelling outputs, which through **Planning Policy Statement 25: Development and Flood Risk** spatially deals with the risk of flooding. This approach is a useful starting point in thinking about how the assessment of risk from Major Hazard Sites can be used to inform the spatial planning process.

3.2 TIMING OF POLICY REVIEW AND ISSUES OF TIME LAG

Different LPAs are at different stages in their LDF production. Some LPAs in England are already a long way towards developing specific site allocations policy whilst others are only 'optioning' on their Core Strategy. In Wales and Scotland, LPAs are on individual review cycles. Policy is reviewed every five years in Scotland and four years in Wales.

Therefore, there will always be an issue of time lag in addressing societal risk and consideration of the spatial implications of the priority societal risk sites. The issue of time lag could be dealt with through interim policy adoption for development control purposes, but would not change spatial allocations outside of the plan review process.

3.3 WHERE IN THE PROCESS SHOULD THE HSE INTERVENE?

A key issue that needs to be considered in terms of spatial allocation of development is addressing environmental pressures, constraints and opportunities. Risk represents one of these key considerations where priority societal risk sites will impact upon spatial development patterns. HSE, therefore, has a pivotal role as a key stakeholder within the policy making process.

The most appropriate place the HSE can influence the development plan process in England is through the Allocations DPD and Proposals Map, which spatially depicts the key development goals. Within Scotland and Wales only one development plan document is produced. **Figure 2.1** shows the policy development process of a Development Plan Document in England. The process in all planning regimes normally takes around three years. Our commentary in the following sections relate to both development plan production in Scotland and Wales and the development of the Allocations DPD in England.

Development plan policy is tested through independent examination on the soundness of the evidence underpinning their policy decisions. The HSE Good Practice Guidance will provide the tools to ensure that the relevant LPAs have adequate information to sufficiently consider risk issues in their spatial allocations decisions. A sound evidence base will be required not only as the foundation for robust policy but is important in monitoring the outcomes of those policies.

In the following sections, the role of the HSE in each of the policy development stages is outlined.

3.3.1 Pre-Production Stage

This is the stage where evidence is gathered and baseline information is formed through a survey of local issues. Evidence must be robust, credible and informed by consultation. Evidence gathered should be proportionate to the issue, relevant to the place in question and as up-to-date as practical having regard to what may have changed since the evidence was collected.

HSE needs to be pro-actively involved in providing evidence on risk issues at the earliest stages in the process. A Good Practice Guide should provide relevant advice as to the systems and process that should be put in to place to deliver this and what information is directly available from the HSE to support planning decisions.

3.3.2 Production Stage

Using the baseline information and responses from consultation, a set of Issues and Alternative Options will be presented for further consultation. The alternatives promoted must be reasonable and realistic. This stage of the process will demonstrate that the plan presents the most appropriate policy

framework, having gone through an objective process of assessment of alternatives. Risk is one of the factors determining the suitability of options where spatial allocations may be affected by priority societal risk sites.

Within this stage there will be an appraisal of the economic, social and environmental sustainability of the plan, the 'Sustainability Appraisal'. The Sustainability Appraisal will form a key role in providing a sound evidence base for the plan and forms an integral part of the plan preparation process, testing the alternatives against local objectives.

The Sustainability Appraisal and representations made on the Issues and Alternative Options will inform decision makers as to which set of spatial options will deliver the most appropriate outcomes for the local area. This will result in the preparation of the Preferred Option and following on from further representations, the production of the final development plan.

Responding to the 'optioneering' process and refinement of policy is a key role envisaged for the risk forum. In addition to their involvement in the risk forum, HSE will have the opportunity to submit formal written representations on the content of the draft development plan and present any further evidence at that stage to inform the later stages of policy formulation.

3.3.3 Examination in Public

The development plan will be subject to independent examination where the soundness of the evidence and appropriateness of the plan in the context of the local area will be tested. For a development plan to be considered 'sound' it must be:

- justified, founded on a robust and credible evidence base and be the most appropriate strategy when considered against the reasonable alternative;
- effective in being deliverable, flexible and able to be monitored; and
- consistent with national policy.

Should the HSE consider that risk issues have not been fully addressed then further representation can be made during the Examination in Public.

The purpose of the Good Practice Guidance should be to ensure that risk issues are considered and addressed at the earliest opportunity in the process and that HSE's involvement should be front-loaded in the 'pre-production' stage.

3.3.4 Adoption and Monitoring

The policy process does not end when the development plan is adopted. Development plans should be continually reviewed and revised (every five years in England and Scotland, four in Wales). This reflects the concept of

‘plan, monitor and manage’ within the planning system. There is a requirement for every local planning authority to produce an Annual Monitoring Report detailing the extent to which policies set out in development plan are being achieved.

Monitoring is essential to the cyclical process of policy making. Through monitoring it will be possible to understand how effective policy and spatial consideration of priority societal risk sites has been against a specified set of indicators and policy targets. HSE, possibly through the risk forum, could provide useful inputs into the development of policy indicators and targets based on their knowledge of the quality of risk data available.

3.3.5 Outcomes from the HSE’s Intervention in the Spatial Planning System

The expected outcome would be development plan policy that adequately responds to risk impacts on the spatial allocation of future development. The mechanism to achieve this would be Good Practice Guidance.

It will be the aim of decision-makers to steer new development away from areas of highest risk. This could be in the form of identifying broad locations where no or only certain types of development and infrastructure would be appropriate. This would be reflected in the spatial allocations of land within the development plan as depicted on the Proposals Map.

The Good Practice Guide should set an overarching framework for best practice when planning for priority societal risk sites.

3.3.6 Outputs of the Plan-Making Process

LPAs are already governed by strict requirements to document evidence and report on consultation outcomes and the process undertaken in deriving policy alternatives and finalising spatial allocations. There are already numerous outputs produced by LPAs which demonstrate how spatial planning decisions have been reached.

The DPD examination process requires an evidence base against which ‘soundness’ of policy can be tested. Supporting evidence is commonly presented as a series of technical papers which support the development plan. Risk could be dealt with as an additional topic within this suite of technical papers.

The consultation process is also clearly documented, as are formal representations made with regard to policy alternatives and individual candidate sites for specific spatial allocations.

4 WHAT THE GOOD PRACTICE GUIDANCE SHOULD CONTAIN

4.1 INTRODUCTION

Good Practice Guidance, setting parameters and establishing a process for dealing with priority societal risk sites in the development plan process will encourage development of a sound evidence base and provide consistency of approach to the assessment of risk throughout the planning system in the UK.

Changes to national policy, through national policy updates or changes to primary planning legislation will prove time consuming and are in fact unnecessary as the planning system provides clear guidance on the breadth of matters that should be considered when formulating policy. A Good Practice Guidance is a practical option which can deliver national strategic advice and guidance for LPAs in dealing with risk.

4.2 THE NEED FOR DEPARTMENTAL ENDORSEMENT

It would be beneficial if the document was endorsed by the Department of Communities and Local Government, the Welsh Assembly Government and the Scottish Parliament. Whilst not necessary, this endorsement would add to the weight it would be given as a material consideration in the planning system.

However, there are many national organisations, such as the Environment Agency, who produce their own Good Practice Guidance which although does not have strict departmental approval is used routinely by LPAs and recognised as having considerable weight during Examination in Public and when determining applications. The key is for the HSE to actively promote the Good Practice Guidance and raise its profile within the relevant LPAs.

4.3 EXISTING GOOD PRACTICE MODELS

There are several good examples of topic/issue related Good Practice Guidance including **Planning for Sustainable Waste Management: A Companion Guide to Planning Policy Statement 10** (<http://www.communities.gov.uk/publications/planningandbuilding/planningandsustainable>) and **Practice Guidance to Support Planning for Climate Change** (<http://www.pas.gov.uk/pas/core/page.do?pageId=94314>) which HSE should be aware of. The principal aim of both sets of guidance is to assist in the delivery of key planning objectives, focussing on the 'how to' achieve the best policy outcomes.

The Companion Guide to PPS10 provides a useful outline for any Good Practice Guidance on risk. It gives advice, ideas, examples of current practice and signposts to further sources of information that will be of relevance to planning authorities and developers.

4.4 STRUCTURE OF THE GOOD PRACTICE GUIDANCE

The structure of a Good Practice Guidance should include the following:

- setting the relationship of priority societal risk sites within the development plan process;
- provide appropriate parameters for development plan policy formulation linked to national guidance on how to deal with risk;
- providing a framework as to how risk issues fit within the policy making process, detailing what structures and processes need to be put in place, how evidence can be collected and the role of consultation and the risk forum;
- the guide would signpost potential sources of data, appropriate methodologies for assessing risk and what tools already exist that can be usefully applied;
- a 'how to consult' section, which will include how to identify relevant stakeholders, encourage early consultation and continuous involvement in the process and the formation of risk forums;
- throughout the Good Practice Guidance good or best practice examples should be cited and the key messages of success drawn out; and
- advice on any appropriate use of policy indicators and targets that can feed through into the monitoring process.

For legibility, techniques such as providing checklists for local authorities, signposting and case study examples would be provided. The aim of the Good Practice Guidance is to be a useable and legible document informing and aiding local authorities in dealing with priority societal risk sites.

At the heart of the Good Practice Guidance should be a clear methodology for considering the spatial planning implications of priority societal risk sites and how to assess what development would be considered appropriate around the sites.

A sequential approach could be an appropriate method in dealing with risk. **PPS25: Development and Flood Risk** uses a sequential approach matching land uses to the risk of flooding. This could prove a very useful model for dealing with land use and development in areas where there is a Major

Hazard Site. In PPS25, development is directed first to sites at the lowest probability of flooding and then in heightened flood risk areas less vulnerable land uses are promoted. This matching of land use versus risk could be used as a framework. It would be possible to include an 'exceptions' test to allow flexibility where local circumstance demands.

4.5 THE FORMAT OF THE GOOD PRACTICE GUIDANCE

It will be possible to deliver a 'live' draft version of the Good Practice Guidance providing scope for consultee input and allowing changes and updates to be made before final publication.

A web version of the guidance, such as adopted for the **PPS25 Companion Guide** and **Good Practice on Planning and Climate Change**, as hosted by the Planning Advisory Service and the Homes and Community Academy (<http://www.hcaacademy.co.uk/planning-and-climate-change>) should be considered.

5.1 RESOURCING IMPACTS ON LOCAL AUTHORITIES

Local Authorities containing priority societal risk sites may require additional resourcing in order to deal effectively with risk issues in the spatial planning process. Although LPAs have dedicated development plan teams in place, the breadth of what needs to be considered as part of the development planning process is continually expanding to deal with strategic issues such as climate change adaptation and mitigation. These requirements, contained in national policy guidance, are already putting increasing pressure on the resource levels within development plan teams.

The risk forums, though effective in bringing together additional technical expertise on risk will not overcome resourcing issues within LPAs. To mitigate some of the resource implications and, therefore, resistance to implementation HSE should play a proactive role in establishing the risk forums and providing modelled information as part of the evidence base.

It is considered that the HSE is taking a pragmatic approach, selecting only those sites that pose the greatest risk. Therefore, the workload generated is proportionate to the risk. This concept is not new and can be said to be true of many local circumstances, such as contaminated land or flooding, where some local authorities need to take account of these land issues and constraints, whilst other will not.

5.2 UPDATES AND CHANGES TO RISK LEVELS AT MAJOR HAZARD SITES

It is recognised that risk levels for a Major Hazard Site may change within a development plan period and that policy won't always be able to be as reactive to these changes given the periods of review prescribed in planning legislation and national policy guidance.

This can be dealt with in terms of development control by adopting interim policy that reflects greater or lesser risk on particular sites. Changes to spatial allocations will be affected by a time lag linked to the development plan review process.

It is envisaged that in developing policy a precautionary approach would have been taken that could absorb small fluctuations in risk. However, if there is significant change to risk levels on a site, this would need to be fed through the development plan monitoring process and an assessment made as to whether it is necessary to make changes to the spatial planning allocations.

Identified Major Hazard Sites can be sensitive in national security terms. The term 'National Security' is not defined in UK legislation. However, when considering safeguarding national security the Courts have accepted that it is proper to take a precautionary approach ⁽¹⁾. The issue is that where LPAs rely on information in determining planning policy, this normally needs to be made available to the public for scrutiny.

The test of whether information could be exempt from the Freedom of Information Act is the application of the public interest test. This test requires a balancing of competing interests, ie the general public interest in disclosure and the public interest in maintaining the exemption. There is a presumption that information should be disclosed unless the harm likely to arise from disclosure would outweigh the public interest in making the information available.

The Cabinet Office has produced **Guidance for Local Authorities and Metropolitan Authorities on National Security Considerations when Dealing with Requests under the Freedom of Information Act**. The Guidance states that it is Government policy to inform the public of the measures that are in place to avoid or minimise the risk of incidents at Major Hazard Sites.

The Guidance states that it may be appropriate to withhold the following information under Section 24 of the National Security of the Freedom of Information Act (2000):

- detailed description of the site, such as the precise location of storage tanks and locations associated with the emergency plan, for example the on site Major Emergency Control Centre;
- actual volumes of material stored;
- detailed information about pipelines (eg construction, flow rates) and associated storage systems;
- details of safety measures on site, including alarm and communication systems;
- procedures to be followed in the event of an emergency, general information will likely remain in the public domain, but specific information could undermine the emergency response;
- the consequences of scenarios considered in designing Emergency Plans;

(1) The House of Lord's Judgment in the appeal of Shafiq Ur Rehman against deportation, Secretary of State for the Home Department (11 October 2001 UKHL47).

- safety equipment and emergency response equipment; and
- specific security arrangements, such as numbers of guards and security measures.

In all circumstances it must be demonstrated there is an identifiable undesirable effect on national security, or the risk of such an undesirable effect would occur if the information were released. When applying the exemption, there must be a record justifying the decision.

Local authorities will still be obligated to provide information about the Major Hazard Site, and only remove that information which demonstrably poses a threat to national security. The use of separate confidential annexes could be a way to deal with the issue of screening and releasing information into the public domain.

This report has explored the potential opportunities for HSE to influence the development plan process in relation to priority societal risk sites and their impact on the spatial allocation of new development. The timescale by which HSE could effect change in the way that risk is currently dealt with by the planning system is linked to where individual authorities are in their development plan process. In some authorities the prospect of time lag in responding to any Good Practice Guidance is high. That is not to undermine the influence that useful and targeted Good Practice Guidance can have on how LPAs deal with specific topics within the development plan process. They are a recognised and respected tool which could improve how risk issues are dealt with in the planning system.

HSE is a key stakeholder who should be fully consulted and involved in the development planning process. The planning system offers the HSE the opportunity to influence spatial planning decisions at key points in the formulation of policy.

The aim of the Good Practice Guidance should be to provide LPAs with a set of working practices, processes, data sources and decision-making tools that can be used to deal proactively with the spatial implications of priority societal risk sites.

Freedom of Information guidance: Exemptions Guidance Section 24: National Security (2008), Ministry of Justice

Guidance for Local Authorities and Metropolitan Authorities on National Security Considerations when Dealing with Requests on the Freedom of Information Act, Cabinet Office

Local Development Frameworks: Examining Development Plan Documents: Soundness Guidance (2008), The Planning Inspectorate

Local Development Frameworks: Lessons Learnt Examining Development Plan Documents (2007), The Planning Inspectorate

Local Development Framework Monitoring: A Good Practice Guide (2005), ODPM

Practice Guidance to Support the Planning Policy Statement: Planning and Climate Change (2008), CLG

Planning for Sustainable Waste Management: A Companion Guide to Planning Policy Statement 10 (2006), CLG

Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (2008), CLG

Planning Policy Statement 25: Development and Flood Risk (2006), CLG

Planning Together: Updated Practical Guide for Local Strategic Partnerships and Planners (2009), CLG