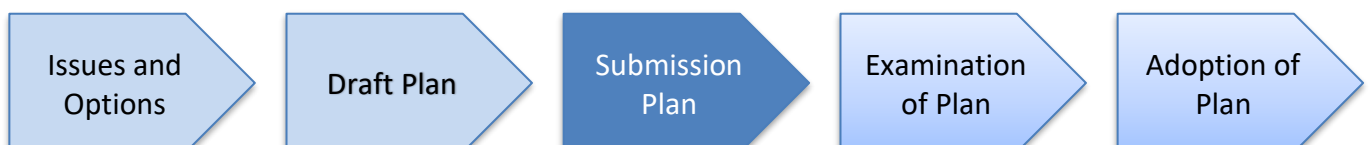


# Reviewing the Plan for **Solihull's Future**

Solihull Local Plan Review

## Water and Flood Risk

October 2020



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## Contents

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1.	<b>Introduction</b> .....	<b>4</b>
2.	<b>Background</b> .....	<b>5</b>
3.	<b>Local Plan Review</b> .....	<b>6</b>
4.	<b>Summary of Evidence</b> .....	<b>7</b>
5.	<b>How the Evidence has been used</b> .....	<b>9</b>
6.	<b>Conclusion</b> .....	<b>10</b>

## 1. Introduction

1. This topic paper is one in a series of papers supporting the Council's Draft Submission Plan which has been published for consultation. The topic papers look at the relevant national and local guidance that impact on the emerging plan, together with how the Draft Submission Plan has been developed and the representations made previously. They also provide a summary of the evidence base and how it has been used to shape the local plan. The topic papers do not contain any policies, proposals or site allocations and should be seen as explanatory supporting documents.
2. The main issue covered by this topic paper is Employment Land, in particular:
  - Water resource issues affecting the Borough;
  - Strategic flood risk issues affecting the Borough;
  - Flood risk issues for the site allocations in the Draft Submission Plan.

## 2. Background

3. Policy relating to Water Management in Solihull is set out in the National Planning Policy Framework and the Solihull Local Plan 2013 (SLP).
4. National policy requires local planning authorities to apply a sequential risk based approach to the location of development, and where it is not possible for development to be located in lower risk zones, an exception test taking account of both flood risk and the wider sustainability benefits to the community.
5. The SLP was informed by a Water Cycle Study for Solihull, based on studies undertaken by the Environment Agency for the Regional Spatial Strategy Phase 2 Housing Options and discussions with Severn Trent Water. A level 1 Strategic Flood Risk Assessment provided evidence of the flood risk across the Borough, and development sites were subject to a Sequential Test to ensure sites with the least risk were considered first. A Level 2 SFRA was undertaken for a small number of sites where the flood risk zones were unknown or more significant issues were identified.
6. The SLP recognises the challenge of the poor or moderate quality of the Borough's main water bodies, the Rivers Blythe and Cole and their tributaries, and increasing risk of flooding associated with new development. A key element of the spatial strategy sought to ensure that development protects and improves the quality of the water environment through the timely provision of foul water infrastructure and the use of sustainable drainage techniques.
7. Policy P11 provides guidance on protecting water quality and the need for the highest levels of water efficiency. It requires the use of sustainable drainage systems, promotes the reduction of flood risk and steers new development away from areas at risk of flooding.

### 3. Local Plan Review

8. The Local Plan Review Scope, Issues & Options was published for consultation during December 2015 and January 2016. The document indicated that the Council considered that Challenge L relating to water and flood risk remained relevant, and that Policy P11 should be carried forward with no changes. Representations argued that the policy should recognise the benefits provided by trees and woodlands in delivering positive water quality and flow outcomes, and that it may need updating to reflect any new recommendations from the updated Water Cycle Study and Strategic Flood Risk Assessment.
9. The Draft Local Plan was published for consultation from December 2016 to February 2017. Challenge L and Policy P11 were maintained with minor updating. The sustainability appraisal was largely neutral, with a major positive for losses from flooding and a moderate benefit for resource efficiency. The one minor adverse on housing resulting from setting aside land for water. A number of representations were received relating to water and flood risk. These highlighted;
  - the need to strengthen the objective to minimise flood risk, ensure no building on flood plains and mitigate impacts on natural assets;
  - that the policy was too prescriptive and the higher water efficiency standard not justified;
  - concern about future management of sustainable drainage systems;
  - need to address the poor quality of the river Blythe;
  - need for greater scrutiny in areas subject to flood risk, including risks downstream; and
  - need to include surface water flood risk.
10. A Supplementary Consultation was published in January 2019, relating specifically to proposed housing allocations. A number of representations were received relating to water and flood risk. These highlighted;
  - Inadequate drainage provision/drainage issues in various parts of the Borough;
  - History of flooding events in various parts of the Borough, which would be exacerbated by development;
  - Failure to take account of 2019 Flood Report;
  - Flood plain should not be included as open space as not useable all year round; and
  - Need for Level 2 Strategic Flood Risk Assessments for a number of the sites, where higher flood zones affected and/or modelling of watercourses has not previously been undertaken.
11. The Draft Submission Plan is being published for consultation from 30 October 2020 to 14 December 2020. The objectives for Challenge L have been strengthened to reference the flood risk sequential test and to restrict surface water discharge rates to rivers. A Flood Risk Sequential Test has been undertaken for relevant sites and a Level 2 Strategic Flood Risk Assessment undertaken for 12 of the proposed site allocations which affect higher flood zones or where modelling is not available to accurately depict the flood zones. Policy P11 has been amended to reflect the additional work undertaken, strengthen reference to water quality and flood protection. Further justification has been added for the higher water efficiency standard. The sustainability appraisal was unchanged from the 2017 outcome.

## 4. Summary of Evidence

### Water Cycle Study

12. The Water Cycle Study for Solihull was published in 2017. The study concludes that there are no major issues which indicate that the planned scale, location and timing of planned development within the Borough is not achievable from the perspective of supplying water and wastewater services. Significant capacity issues have been identified at a number of the wastewater treatment works which will require early engagement from developers, and timely provision of infrastructure upgrades.
13. Whilst the study concludes that water resources should not be considered as a barrier to the level of growth proposed, it recommends the adoption of the higher water efficiency standard, given the area's status as moderately water stressed.

### Level 1 Strategic Flood Risk Assessment

14. A Level 1 Strategic Flood Risk Assessment was published in 2017. It provides information and guidance on flood risk from all sources across the Borough and the basis for applying the flood risk sequential test.
15. A site screening spreadsheet provides information on the flood risk for the proposed site allocations in the Draft Local Plan 2016. This shows the proportion of each site within the different flood zones and that may be at risk from surface water flooding. No issues are identified from the historic flood map. It identifies where an ordinary watercourse that has not been modelled passes through or adjacent the sites, and provides an indication of the need for Level 2 assessment and additional modelling.

### Flood Risk Sequential Test

16. A flood risk sequential test for the proposed site allocations has been prepared and published alongside the Draft Submission Plan 2020. This draws together evidence from the Strategic Flood Risk Assessment and other sources and advice from the Environment Agency. The site assessments indicate whether the sequential test is required, and where relevant, set out the alternative sites that have been considered. These alternatives have also been included in the document.
17. Three sites are identified as needing to undergo the sequential test, Sites 12, 19 and 20. Alternative sites are considered to Site 12, but are assessed as having a similar or greater level of flood risk. No reasonable alternative sites are identified for Sites 19 and 20, which are respectively, a unique location that cannot be replicated, and dependent on the proximity of the Jaguar Land Rover factory.

### Level 2 Strategic Flood Risk Assessment

18. A Level 2 Strategic Flood Risk Assessment has been prepared and published alongside the Draft Submission Plan 2020. This provides a more detailed assessment of 12 of the proposed site allocations in the Draft Submission Plan, Sites 1, 4, 6, 8, 9, 10, 12, 17, 18, 19, 20 and 26. These have been re-referenced in the Draft Submission Plan as Sites BC1, BL1, HA1, KN1, KN2, ME1, BL2, SO2, UK1, UK2 and BL3. NB. Site 18 Sharman's Cross Road is not included as a proposed site allocation in the Draft Submission Plan.
19. The assessment covers all sources of flooding, including fluvial, surface water and groundwater, mapping of the functional flood plain and the impacts of climate change, with modelling of watercourses where this does not exist. It includes structures and culverts where

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relevant, and a cumulative impact assessment of sites in the Blythe area, Sites BL1, BL2 and BL3.

20. The majority of these sites are at some risk of fluvial and/or surface water flooding, though the degree of risk varies. None of the sites is located in a Groundwater Source Protection Zone. Where relevant, the potential impact on safe access and egress is considered. The report undertakes a strategic assessment of sustainable drainage systems options.



## 5. How the Evidence has been used

### Water and Sewerage

21. The Water Cycle Study confirms that the level of growth, distribution of development and phasing proposals in the Draft Submission Plan are achievable in terms of water supply and wastewater services. The Infrastructure Delivery Plan supporting the Draft Submission Plan sets out how the necessary infrastructure improvements will be delivered.
22. Policy P11 in the Draft Submission Plan requires developers to ensure that appropriate sewerage infrastructure is provided and that sufficient sewage treatment capacity is available to ensure no deterioration in water quality and that development is not delayed by the need for additional water treatment capacity. The policy also requires the highest possible standards of water efficiency to minimise consumption to a maximum of 110 litres per person per day.

### Flood Risk

23. The Level 1 Strategic Flood Risk Assessment provided an indication of the need for Level 2 Strategic Flood Risk Assessment of the proposed site allocations in the Draft Local Plan 2016. This has been supplemented with advice from the Environment Agency in its representation in response to the Supplementary Consultation 2019. A site scoping table updating the site screening spreadsheet 2017 and including the additional sites was provided as part of the Level 2 Strategic Flood Risk Assessment in April 2020.
24. This evidence was used to inform the preparation of the Flood Risk Sequential Test, which confirms those sites that require a Level 2 Strategic Flood Risk Assessment and additional modelling. The output from the Level 2 Strategic Flood Risk Assessment has been considered by the Council and assessments undertaken for each site which provide an overview of flood risk and highlight the risks and opportunities. The Level 2 Strategic Flood Risk Assessment and the Council's Assessment have informed the proposed site allocations in the Draft Submission Plan. Where relevant, site specific policies include the requirements to minimise and mitigate flood risk.

## 6. Conclusion

25. This Paper sets out how the Local Plan Review will address water supply, wastewater provision and flood risk in the Borough for the Plan period. It provides a summary of the review process, as it relates to water and flood risk. It also summarises the Water Cycle Study, Strategic Flood Risk Assessments and Flood Risk Sequential Test report, together with additional evidence that has been used to develop the water and flood risk management element of the Draft Submission Plan.
26. The evidence supports the growth levels and distribution in the Draft Submission Plan and the inclusion of the proposed site allocations. It also supports the inclusion of the higher water efficiency standard in Policy P11 and the inclusion of likely infrastructure requirements relating to drainage and flood risk in the individual site policies.

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