

Mr Maurice Barlow
Solihull Metropolitan Borough Council
Development Control
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West Midlands
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Our ref: UT/2009/105658/CS-
03/PO1-L01
Your ref:
Date: 30 April 2019

Dear Mr Barlow

SOLIHULL LOCAL PLAN REVIEW

DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION

Thank you for referring the above consultation which we received on 30 January 2019. We apologise we have been unable to respond prior to now, and hope that you are still able to take our comments into account as the plan develops.

We have reviewed the above consultation document which is dated January 2019 and note the inclusion of additional sites for consideration for allocation.

We welcome the inclusion of Flood Risk as a potential 'Hard' issue in the site selection criteria as identified on page 18 and 19. We further recommend that Water Quality is added to the footnote in this section, with particular referenced to River Blythe's SSSI status. Further to this page 29 looks at what is required for the Blythe in the future and protection and enhancement of water quality should be included.

Please see below our advice with regards to your site allocations, which incorporates comments previously provided, and adds additional comments in relation to your new sites. These comments should be used in preference to those previously provided as they have been updated.

Balsall Common

Site 1 – Barratt's Farm (capacity 900) – Page 25

An ordinary watercourse flows through the site, however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is

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undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

Blythe

Site 4 – West of Dickens Heath

The site falls within Flood Zone 1, however there appears to be an ordinary watercourse near the western boundary of the site with its source at Betteridges Barn and then it is culverted under the Sport Pavilion Ground and Tythe Barn Lane. As our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

In addition, this area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Dickens Heath. As a result the LLFA should be allowed to comment further regarding this as any development in this location could provide flood storage and should help reduce flood risk downstream. We recommend that a Level 2 SFRA is undertaken to consider how development in this area could alleviate existing flood risk issues.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

Site 11 - TRW/The Green, Shirley

This area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Dickens Heath. As a result the LLFA should be allowed to comment further regarding this as any development in this location could provide flood storage and should help reduce flood risk downstream. We recommend that a Level 2 SFRA is undertaken to consider how development in this area could alleviate existing flood risk issues.

Site 12 – South of Dog Kennel Lane, Shirley

This site lies partially within Flood Zones 2 and 3. In light of this the Sequential Test should be undertaken to demonstrate there are no alternative sites available at a lower risk of flooding. A level 2 SFRA should be undertaken to support this allocation.

The Mount Brook (Main River) is a tributary of the River Blythe which flows through Cheswick Green. There are known flooding problems through the village. The recent residential development at Mount Dairy Farm provided some flood storage, however further upstream storage is required to reduce the risk in Cheswick Green. We therefore recommend that an additional requirement '*to provide flood attenuation to reduce the risk of flooding in Cheswick Green*' is added to the Plan.

This area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Cheswick Green, as a result the LLFA should be allowed to comment further regarding this as any development in this location

could provide flood storage and should help reduce flood risk downstream. We recommend that a Level 2 SFRA is undertaken to consider how development in this area could alleviate existing flood risk issues.

Site 26 - Whitlock's End Farm

An ordinary watercourse is within the South Eastern corner of the site however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

This area is being investigated by Solihull MBC to assess potential options to reduce flood risk within Dickens Heath and Cheswick Green, as a result the LLFA should be allowed to comment further regarding this as any development in this location could provide flood storage and should help reduce flood risk downstream. We recommend that a Level 2 SFRA is undertaken to consider how development in this area could alleviate existing flood risk issues.

Hampton-in-Arden and Catherine-de-Barnes

Site 6 - Meriden Road, Hampton in Arden

There is a culverted ordinary watercourse on the northern boundary of the site which is a tributary of the River Blythe, however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

Knowle, Dorridge and Bentley Heath

Site 8 – Hampton Road, Knowle

A Main River (Purnells Brook, tributary of the River Blythe) bisects the site, however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1.

We strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

As a Main River, a minimum 8m easement should be provided from each bank in order to allow for essential channel maintenance. This will serve the dual purpose of protecting and maintaining green and blue infrastructure.

Should you chose not to undertake modelling as part of a Level 2 SFRA, we will require modelling to be undertaken as part of a site-specific Flood Risk Assessment in support of a planning application, and development will need to be located outside Flood Zone 2 and 3, and the 100 year plus climate change flood extent. Any numbers allocated for this site will need to have sufficient flexibility to ensure they can respond to unassessed flood risk issues so that the allocation is not compromised by inability to deliver the required scale of development whilst also meeting flood risk requirements.

Site 9 - South of Knowle, Knowle

There are a number of ordinary watercourses (Cuttle Brook and unnamed) across the site, however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

Meriden

Site 10 – West of Meriden, Meriden

An ordinary watercourse forms the northern boundary of the site, however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

Solihull Town Centre & Mature Suburbs

Site 18 – Sharmans Cross Road, Solihull

An ordinary watercourse forms the western boundary of the site, however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining

green and blue infrastructure.

UK Central Hub

Site 19 - HS2 Interchange Site, Solihull

The Holywell Brook, a designated Main River flows through the centre of the site with associated Flood Zones 2 and 3. In light of this the Sequential Test should be undertaken to demonstrate there are no alternative sites available at a lower risk of flooding. A level 2 SFRA should be undertaken to support this allocation.

All development should be located outside of Flood Zone 2 and 3 as shown on the SFRA Climate Change Maps. A minimum 8m easement should be maintained along the banks for essential flood risk access and provision of a green and blue corridor.

Site 20 - Lane either side of Damson Parkway, Solihull

An ordinary watercourse (Low Brook) forms the eastern boundary of the site however our 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km², mapping of the risk from the watercourse has not been undertaken and as such this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however we strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.

Regardless of flood risk, we recommend an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

In summary, a Sequential Test and Level 2 SFRA is required for the following sites located within the mapped floodplain:

- Site 12 Land south of Dog Kennel Lane, Shirley
- Site 19 HS2 Interchange Site, Solihull
- Site 20 Land either side of Damson Parkway, Solihull

Furthermore, we recommend that due to ongoing existing issues within Dickens Heath and Cheswick Green area, your authority consider undertaking a Level 2 SFRA to consider a strategic approach to flood alleviation options in the area. Solihull MBC as the LLFA are currently undertaking assessment work into options within this area in conjunction with the Environment Agency, and this work is anticipated to be completed in September. A Level 2 SFRA could supplement and expand this. This impacts the following sites:

- Site 4 Dickens Heath
- Site 11 TRW/The Green, Shirley
- Site 12 Land south of Dog Kennel Lane, Shirley
- Site 26 Whitlock's End Farm

A number of sites may be subject to flooding however there is no indicative mapped available to indicate the extent. You may wish to undertake further assessment of these sites in conjunction with the LLFA to ascertain the land available for development within these sites:

- Site 1 Barratt's Farm
- Site 4 Dickens Heath

- Site 6 Meriden Road, Hampton in Arden
- Site 8 Hampton Road, Knowle (*Main River – EA lead not LLFA*)
- Site 10 land west of Meriden
- Site 18 Sharmans Cross Road, Solihull
- Site 20 Land either side of Damson Parkway, Solihull
- Site 26 Whitlock's End Farm

Should you have any queries regarding the above, please contact me on the details below. We would be happy to meet and discuss if you feel this would be of use.

Yours sincerely

Ms Jane Field
Planning Specialist

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