

4<sup>th</sup> June 2015

Amanda Willis  
Programme Officer – Tamworth Local Plan  
South Staffordshire Council  
Council Offices  
Codsall  
South Staffordshire  
WV8 1PX

## **TAMWORTH BOROUGH COUNCIL LOCAL PLAN 2006 - 2031 EXAMINATION**

Dear Amanda,

Please note that our comments in this instance only refer to the questions raised in the Key Matters Discussions Note.

From a Lead Local Flood Authority perspective, we consider that the Local Plan is sound, legally compliant and adheres with the duty to co-operate. Generally, it could be made more effective by modifying specific policies to help readers better understand the aims and objectives of the document, and to improve clarity and accuracy.

The Plan partially relies on the release of housing sites which are located within areas of high flood risk, and we have concerns from a fluvial and pluvial perspective on proposed development upon areas adjacent the River Tame, as lying entirely within the floodplain of River Tame. We would emphasize that sites must not create an unacceptable flood risk and includes sufficient mitigation to help offset this risk, else there may not be scope to discharge surface water effectively when the Tame is in high water. It is our view that sites within close proximity of Rivers and watercourses will usually be within a high risk flood zones and development within these areas may pose an unacceptable fluvial and pluvial flood risk. In addition, other considerations may be compromised such as loss of access for maintenance and riverside improvement, obstruction to overland flood flows and loss of floodplain and overland flow routes.

The proposed Sustainable Urban Extensions (SUEs) should be appropriately supported by Flood Risk Assessments, hydraulic modelling (where necessary) of ordinary watercourses and include sustainable drainage features, in line with CIRIA best practice and the Non-Technical SuDs Standards in order to provide sufficient mitigation in order not to increase fluvial or pluvial flood risk elsewhere.



Policy SU4 – Flood Risk and Water Management

We welcome the inclusion of Policy SU4 and the incorporation of viable and site specific SuDS schemes to limit surface water discharge rates to greenfield run-off rates. We would suggest that new development proposals take opportunities to open up culverted watercourses and ensure that built development offers sufficient easements and take due regard to future improvements to existing culverts by daylighting these channels or reducing inflows into the piped channels.

We would resist any proposal to build over existing culverts, as this can affect the structural integrity of the culvert itself and prohibit flood flows in the event that the pipe becoming blocked, damaged or if it were to receive flow of a greater volume than the capacity of the culvert.

We would suggest that proposals take into account surface water mapping and utilise existing flow routes as landscaped areas through sites to keep them clear of development. This could form natural corridors through sites, which could also serve as dual purpose aspects and fulfil other policy aims such as using flow routes for cycle routes, footpaths, habitat connection corridors et cetera. SuDS can be multi-functional spaces, and can operate as both drainage facilities and provide welcome green or public spaces such as parks, car-parks, footpaths and verges particularly in high density environments. We would wish to reiterate that in line with the NPPF and associated NPPG that the functional floodplain should only be used for water compatible development and essential infrastructure where necessary.

There needs to be more clarity about potential development in Flood Risk Areas. The wording seems to suggest that development is possible in Flood Risk Areas with mitigation and we are minded to suggest that in some cases, this is misleading. The NPPF has a presumption toward locating development into those areas at least risk of flooding, taking into account all sources of flood risk – fluvial, pluvial and groundwater flooding.

Yours sincerely,

**Hannah Hogan**

Flood Risk Planning & SuDs Officer  
C/O Staffordshire County Council,  
2 Staffordshire Place,  
Tipping Street,  
Stafford. ST16 2DH.

Tel: 01543 334583

E-mail: [hannah.hogan@staffordshire.gov.uk](mailto:hannah.hogan@staffordshire.gov.uk)

[www.staffordshire.gov.uk](http://www.staffordshire.gov.uk)

