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Lyndon House
62 Hagley Road
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Birmingham
B16 8PE

Our ref: UT/2006/100274/BD-
01/IC1-L01
Your ref: WBCSWC
Date: 14 December 2007

FAO Beccy Dunn,

Dear Madam

COVENTRY, SOLIHULL and WARWICKSHIRE STRATEGIC FLOOD RISK ASSESSMENT

Thank you for consulting us of the above draft Strategic Flood Risk Assessment (SFRA) which was received 26 November 2007.

We have reviewed the information and wish to make the following comments:

All SFRAS

As much of the SFRAs are generic text we consider that a generic document with individual supporting documents for each council would be more useful. This would mean that only the supporting documents would have to be updated as more information became available, whilst the main generic document would introduce a consistent approach to flood risk for all the councils involved in this project and would only require alterations if there were changes in national planning policy.

1.2 Project Aims

The definition of a "safe" development only relates to safe pedestrian access and does not mention the safety of the development itself, or its affect on downstream property. We would wish for this definition to be broadened.

3.4 Environment Agency Flood Zone Maps

The limitations of the Flood Zone outlines have still not been made clear in Appendix C, as per Sarah Mallett's e-mail of 4 Oct 07: -

The Agency's Flood zone maps do not show all minor watercourse flood plains, For any site (not just those over 1ha) adjacent to an unmapped watercourses (Shown as Flood zone 1) it is therefore necessary to undertake a site specific FRA to establish the true flood plain extent and flood risk to the site. The SFRA should therefore advise LPAs to look at extending the flood zone outlines on all watercourse in FZ1 shown on the 25k OS map,

particularly where these have been identified as being within potential development areas.

7.2 Policy Considerations

In principle we have no issues but think the wording could be clearer regarding runoff reductions;

Greenfield Rate or reduction of at minimum 20%

7.3 Development Control Policies

The issue of breach scenario as set out in part 1 of 'Future Development in Flood Zone 3' is relevant for all sites irrespective of the fluvial flood risk category and hence should be included in all the Flood Zone categories.

In Sections 7.3 and 9.1.1, it states that "essential infrastructure" can be located in flood zone 3b. We believe this needs further clarification. Transportation routes may have to cross river valleys and account would need to be taken for these circumstances however, development such as hospitals and police station in 3b may be deemed unacceptable.

10.2 Types of SUDS Systems

This section may also want to refer at the end to CIRIA c644 - Green Roofs and we would wish to see a requirement for SUDS in all cases not just sites over 1 hectare.

The Geological and Floodwatch areas on the mapping do not show up in the PDF, as the base mapping is overlain over the top of them.

Additional Points:

- Reference needs to be made to watercourses crossing sites which do not have any flood zone. All will require an assessment of risk associated with flooding from those particular watercourses.
- In Rugby, Warwick and Coventry the document refers to the River Trent CFMP. These two areas both drain to the Severn and therefore the Severn CFMP applies and not the Trent. This needs to be amended.

Specific comments relating to each LPA:

NUNEATON & BEDWORTH BOROUGH COUNCIL

1.7.1 Main Rivers and Hydrology - The Borough is covered by three designated Main Rivers:

- The following Main Rivers have been omitted from the list (but included in the NMRs paragraph) : -

- Wem Brook SP 3662 9118 to SP 3738 8932
 - Breach Brook SP 3422 8494 to SP 3334 8526 (check Grid Ref with Main River Schedule)
 - Bedworth Sloughs Brook SP 3504 8685 to SP 3502 8610 (check Grid Ref with Main River Schedule)
 - Change Brook SP 3805 9368 to SP 3614 9284
- The following Non Main Rivers have been omitted from the minor watercourses paragraph: -
 - Holly Stitches Brook
 - Griff Brook

5. Strategic Flood Risk Mapping - 5.1 Strategic Flood Risk Maps

We would like to question whether the SFRA Maps should also identify at ground level (top water surface) water bodies that form a fundamental part of the Artificial Drainage/flood defence system, which should not be allowed to be filled in/developed. The document only mentions the Bar Pool Brook Storage Lake as being one of these systems, but other balancing pools may also have been constructed as part of development site for flood risk alleviation purposes.

N&B BC Ward Councillor Tony Lloyd has recently advised Sarah Mallett of the Agency that a balancing pool just north of The Willows performs such a function and he believes that it is currently proposed to be filled in, in order to allow development. This issue should be clarified further.

To discuss this issues further please contact Sarah Mallet, Tel. 01543 405029.

6.1.2 Flood Risk Management Strategies

We would like to know why the Tame Strategy has not been reviewed for inclusion in this document. This section clearly states that the options listed come from the Tame Strategy, and that Nuneaton & Bedworth Borough Council area does not feature in either the Trent or Severn Strategies. These issues need to be rectified. To discuss these issues further please contact Sarah mallet, Tel. 01543 405029.

Solihull Metropolitan Borough Council

5.1.1 Hydraulic (River) Models

The River Blythe which runs through the borough has also been modelled and needs to be included within the text in addition to the references regarding the River Cole.

In addition we have additional comments from our Flood Risk Mapping and Data Management Technical Specialist, Demi Korontzi, please see attached sheet, to discuss any of these issues please contact Demi direct on Tel. 01543 404983.

Yours faithfully

**Miss Sarah Victor
Planning Liaison Officer**

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