

REPRESENTATION

By email 12/12/22

Hello,

North Worcestershire Water Management is a shared District Council service serving Wyre Forest, Bromsgrove and Redditch District Councils. We have reviewed your draft Local Plan which is of interest to us as there are two catchments that cross the District (and County) border, namely the Horse Brook, a tributary of the River Stour, and the Stour itself. There are properties in Wyre Forest at risk of flooding in both catchments.

We don't have any particular concerns regarding the site allocations included in the draft Local Plan as surface water drainage schemes, including SuDS, for the future developments should ensure that the development of these sites will not exacerbate flood risk elsewhere, including over the border in Wyre Forest District. We note that the requirements relating to surface water drainage schemes are included in policy NB7. This policy refers to National and Local Policies. Not being fully aware of the relevant Local Policy, we do note that the NPPF (par 161) specifies that the future impacts of climate change need to be taken into account. We wondered whether you in policy NB7 may want to include a reference to specific climate change requirements? For instance, Wyre Forest's policy SP.32 states that the SuDS design should make allowances for climate change, in line with the latest Government's Climate Change Allowances guidance. In addition, in the same policy Wyre Forest has included the requirement that future development in residential schemes ('urban creep') should also be taken into account, depending on housing density. Climate Change and urban creep allowances are currently not included in the non-statutory technical standards for SuDS (2015).

We believe that expanding policy NB7 with specific requirements for the inclusion of climate change and urban creep impacts would more fully ensure that the surface water drainage schemes included in future development would be robust and sustainable, therefore providing a greater reassurance that developments will not increase flood risk for others, including many years into the future.

We welcome the fact that policy NB7 includes that SuDS are required to protect the water environment from polluted surface water runoff. We do wonder whether you may want to include detail as to how compliance with this policy requirement is to be assessed. For instance, Wyre Forest has opted to include in the justification for its water quality policy (SP.30) that "developers are required to set out how surface water from the development will be treated sufficiently, using the simple index approach included in the Ciria SuDS Manual (2015)."

Best wishes,

Kirsten



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A shared District Council service covering Bromsgrove, Redditch & Wyre Forest

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Our vision is to reduce flood risk while protecting and enhancing the water environment and encouraging sustainable water management

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