South Staffordshire Council

Local Plan Review

Publication Plan

Strategic Flood Risk Assessment and Sequential Test

Topic Paper

April 2024

Contents

1. Introduction

1.1. This document is one in a series of topic papers which has been produced to support the emerging South Staffordshire Local Plan Review Publication Plan 2024.

1.2. This Topic Paper has been produced on the advice of the Environment Agency (EA) (in their response to the previous Regulation 19 consultation in a letter dated 21 December 2022 and previous consultation responses). This Paper sets out the council's approach towards taking flood risk into account when selecting sites for allocation and how it has applied the Sequential Test.

1.3. The main areas covered by this topic paper are:

- The national planning policy context for flooding and flood risk
- An overview of the key evidence which has been used to inform the policy approach taken in the Local Plan
- The approach the Council has taken in assessing flood risk when selecting sites to be allocated in the Local Plan
- Applying the Sequential Test
- Consideration of the Exception Test.

2. Defining flood risk

2.1. Mitigating flood risk is an increasingly important function of the planning system. In producing strategies and plans for future growth and development, planners must take account of various types and sources of flooding. Fluvial, sea, groundwater and surface water flooding can all pose a threat to communities.

2.2. The Environment Agency has developed flood risk maps for the entire country that identify areas of land at risk of flooding. The map classifies land within one of three flood zones. The National Planning Practise Guidance on Flood risk and coastal change provides a table of definitions of the different flood zones which has been replicated below.

Flood Zones

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
Zone 2 Medium Probability	Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise: • land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or • land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

2.3. The National Planning Practise Guidance on Flood risk and coastal change also provides a table of 'Flood risk vulnerability and flood zone 'incompatibility'' which specifies what forms of development (as classified in Annex 3 of the NPPF)[1] are considered acceptable in different flood zones. This table has been replicated below.

[1] https://www.gov.uk/guidance/national-planning-policy-framework/annex-3-flood-risk-vulnerability-classification

Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

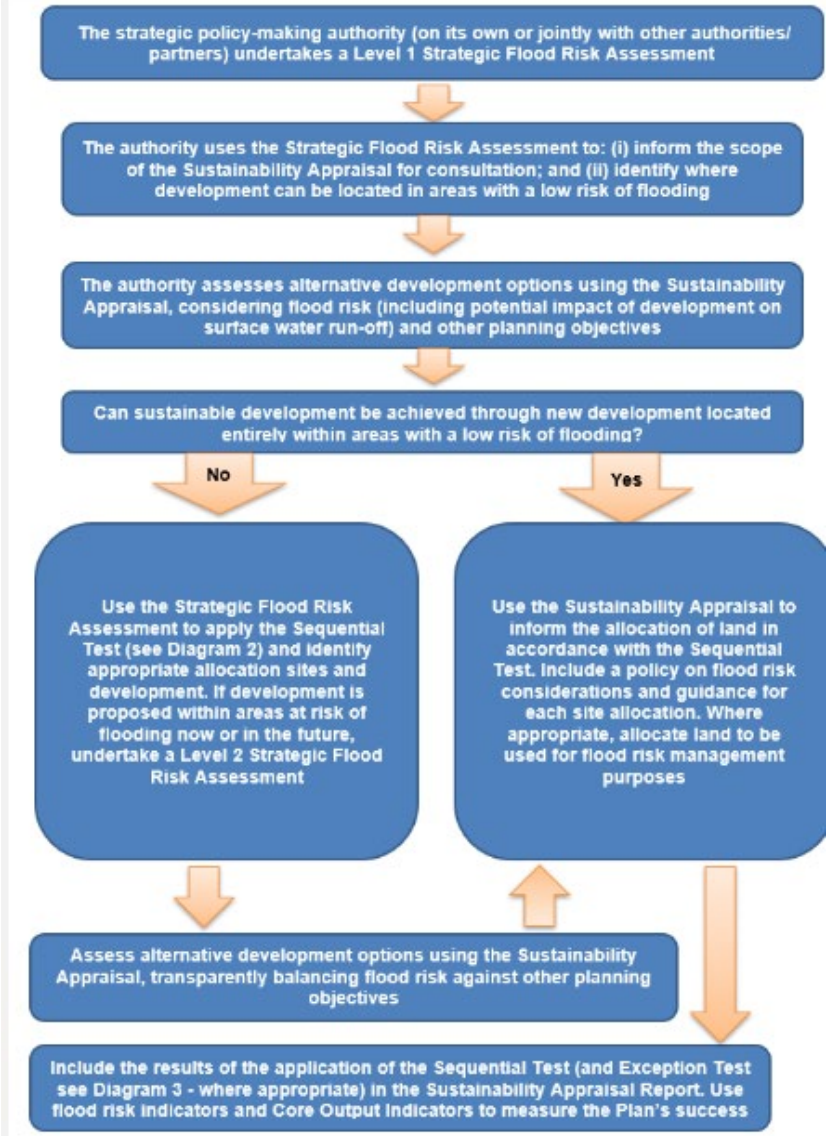
3. National Planning Policy Framework and Guidance

3.1. The revised National Planning Policy Framework (NPPF) was published in December 2023, replacing the previous versions. The NPPF sets out Government's planning policies for England. It must be taken into account in the preparation of local plans and is a material consideration in planning decisions.

3.2. Chapter 14 of the NPPF includes a section on 'planning and flood risk'. Paragraphs 165 to 171 provides the relevant policy has to how strategic policies and local plans should deal with flood risk. Paragraph 167 sets out how *'plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property'.*

3.3. Further guidance on flood risk is provided in the National Planning Practice Guidance on flood risk and coastal change. In particular, guidance is provided on taking flood risk into account in preparing plans. The key steps involved are provided in a diagram[2] which is replicated below:

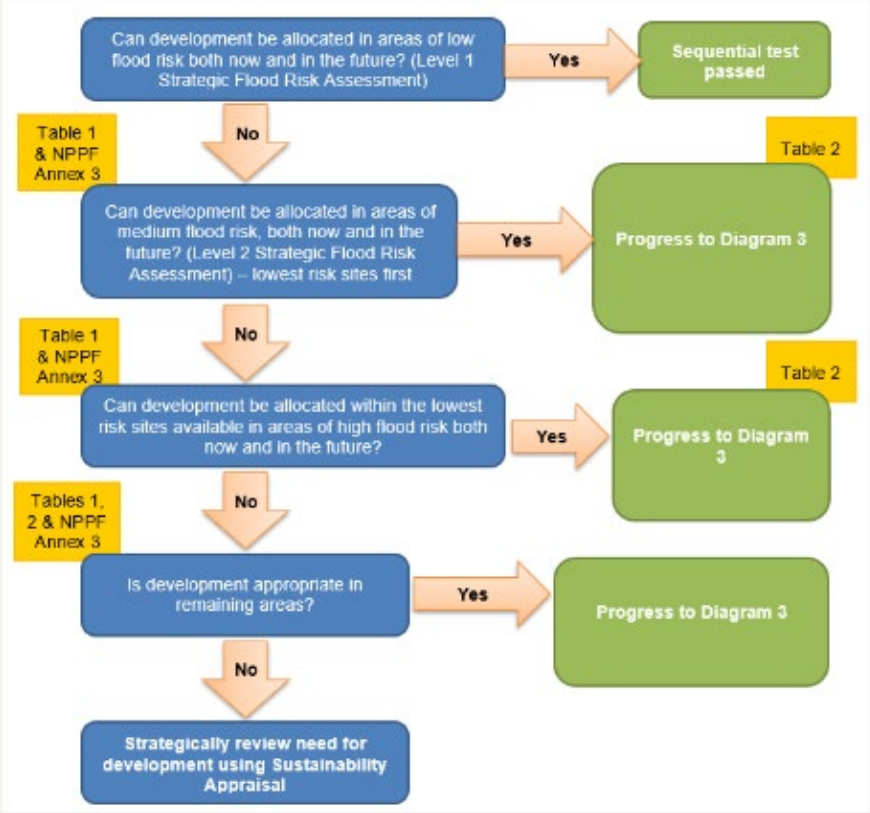
Diagram 1: Taking flood risk into account in the preparation of strategic policies



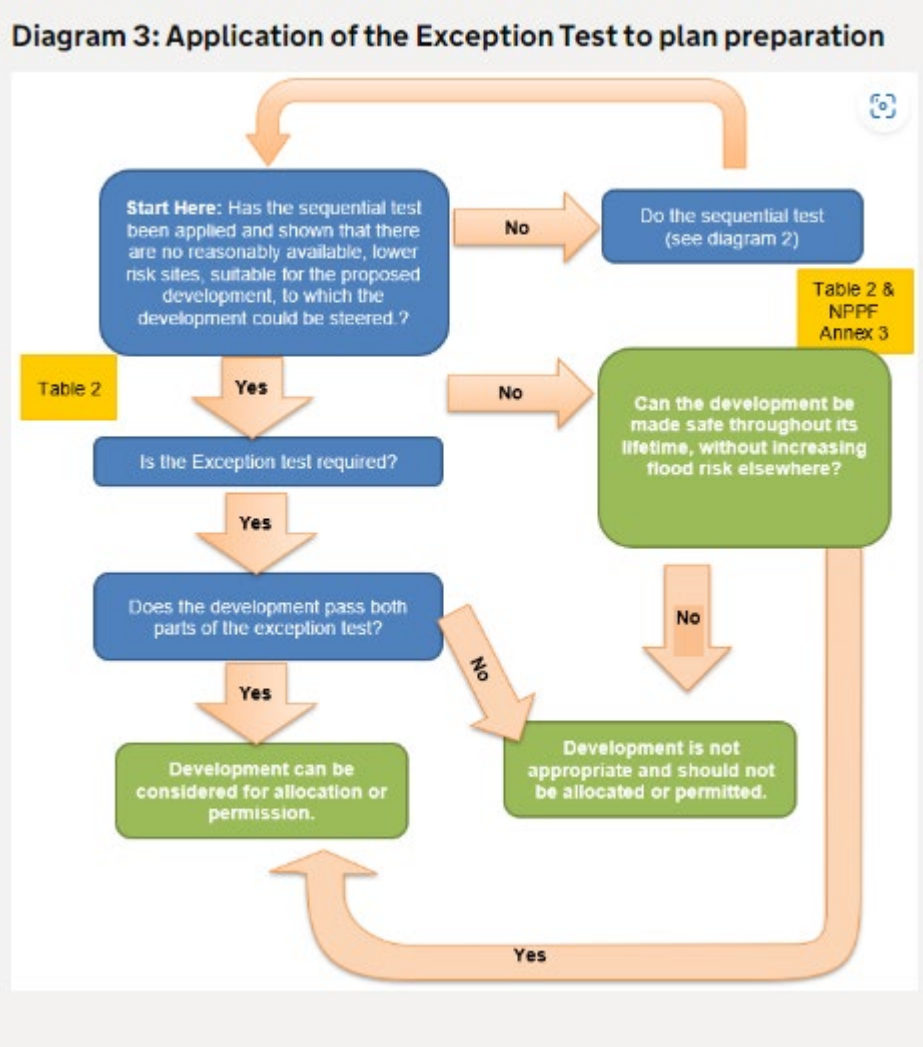
3.4. Diagram 2[3] (below) demonstrates how LPAs should apply the Sequential Test to their plans if required.

[2] Paragraph: 026 Reference ID: 7-026-20220825
[3] Paragraph: 033 Reference ID: 7-033-20220825

Diagram 2: Application of the Sequential Test for plan preparation



3.5. Diagram 3[4] demonstrates the Application of the Exception Test to plan preparation if required.



4. Key evidence

4.1. This section provides details of the key evidence available on flood risk which are available on the council's evidence base webpage. These are:

- Strategic Flood Risk Assessment Level 2 2022
- Strategic Flood Risk Assessment 2019
- Water Cycle Study 2020
- Sustainability Appraisal 2024 and previous version

[4] Paragraph: 033 Reference ID: 7-033-20220825

5. The Local Plan's approach to flood risk

5.1. This section of the Topic Paper sets out the approach the council has taken to considering flood risk when forming its local plan and selecting sites for allocation.

5.2. When considering sites for allocation, sites were first screened based on fluvial flood zones (and other constraints). As set out in the council's SHELAA Report, sites which were largely covered by Flood Zone 3 were automatically deemed as 'unsuitable for development'.

5.3. Sites which passed the initial screening in the SHELAA were taken forward to the next assessment stage. This stage included consulting the Staffordshire County Council as the Lead Local Flood Authority (LLFA) who screened sites using the Level 1 Strategic Flood Risk Assessment and other available data. Sites with flood risk issues that could not be mitigated were filtered out. Where flood risk issues could be mitigated on sites, this was noted and factored into the site assessment process to ensure that the Sequential Test could be applied. The LLFA's comments on individual sites can be found within Appendix 3 of the Housing Site Selection Topic Paper. The same approach was taken towards assessing employment sites. The LLFA's comments on individual employments sites can found in the Economic Strategy and Employment Site Selection Topic Paper.

5.4. Ongoing engagement has also taken place with Severn Trent Water (STW) who are the statutory sewage and water body for the district. STW have provided a risk rating for proposed allocations which does not highlight any insurmountable sewerage infrastructure or surface water risks. The risk ratings are predominantly related to the following (can be single or multiple);

- the site being of a significant size
- the site being in a geographical location;
    - where we have historically had a report of sewer flooding
    - where it may impact a storm overflow
    - which may not have a suitable surface water discharge option; considering the drainage hierarchy.

These risk ratings were most recently reviewed in March 2024 and are set out in Appendix 2.

5.5. The Environment Agency responded to the Council Preferred Options consultation in a letter dated 13 December 2021. The EA identified 8 housing allocations which were potentially affected by Flood Zones 2 and 3 and requested that a Level 2 SFRA was carried out for these sites. In response the council appointed JBA consulting to undertake a Level 2 SFRA (which the EA helped to advise on) for these sites, taking into account the latest climate change allowances.

5.6. The Level 2 SFRA (dated November 2022) along with site maps and tables were published alongside the council's Regulation 19 Publication Plan consultation in November 2022. The EA responded to the consultation in a letter dated 21 December 2022. The EA welcomed the Level 2 SFRA but advised that the council should clearly set out its approach towards how the site allocations have had the sequential test applied.

5.7. The Council is now consulting on a new Regulation 19 Publication Plan. Out of the 8 sites assessed by the Level 2 SFRA, 3 are no longer being taken for allocation. These are the strategic site at Cross Green (ref 646a&b), Land off Billy Buns (ref 463) and land at Gilbert Lane (ref 284) in Wombourne. The remaining 5 which are still being taken forward are: Pool View, Churchbridge (ref 139), Land at Four Ashes Road, Brewood (ref 617), Land adjoining Saredon Road, Cheslyn Hay (ref 119a), strategic site allocation at land east of Bilbrook (Policy SA1) and strategic site allocation at land north of Penkridge (Policy SA2).

5.8. At paragraph 10.2, The Level 2 SRFA concludes that:

'the majority of sites with a detailed Level 2 summary table are at fluvial flood risk. The degree of flood risk varies, but most sites are only marginally affected along their boundaries. As most of the sites lie alongside unnamed ordinary watercourses, detailed modelling was not available to inform risk to the sites….', however '*…one site, 0119a, is at more extensive risk of flooding*'.

5.9. Paragraph 10.2 goes on to conclude that:

'Most sites are not at significant surface water risk, with surface water risk commonly aligning with floodplain topography of the ordinary watercourses. Sites at greatest risk of surface water flooding are generally those where surface water flood risk is located in areas away from fluvial flood risk, in particularly site 463, where a surface water flow path bisects the site.'

Site 463 is no longer proposed for allocation.

5.10. The council's proposed approach is to locate the most vulnerable aspects of development in areas of lowest flood risk within these allocations as recommended in the NPPG on Flood risk and coastal change (below). The council will therefore seek to ensure that areas of higher flood risk on the site are used for uses such as amenity open space and other acceptable uses (as set out in Annex 3 of the NPPF).

'Within sites, using site layout to locate the most vulnerable aspects of development in areas of lowest flood risk, unless there are overriding reasons to prefer a different location. In addition, measures to avoid flood risk vertically can then be taken, by locating the most vulnerable uses on upper storeys, and by raising finished floor and/or ground levels, where appropriate and that such techniques are suitably designed.'

NPPG Paragraph: 004 Reference ID: 7-004-20220825

5.11. The Council's proposed Policy NB7: Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality (Appendix 1) specifies that development shall be located on Flood Zone 1 or areas with the lowest probability of flooding. In addition, the site pro-fromas for each site state that: *'development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table'* and that it is a key requirement of the site to 'p*rovide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level*'. In line with the EA's recommendations in their letter consultation response dated 21 December 2022.

5.12. In relation to the two strategic sites, these allocations are subject to detailed masterplanning (as required by policy MA1) which will take into account areas of higher flood risk (informed by a site-specific Flood Risk Assessment) to ensure that the site layout is planned accordingly to locate the most vulnerable aspects of development in areas of lowest flood risk. This was acknowledged in an EA's consultation response letter dated 13 December 2021 which stated: *'SA1, SA2 and SA4 are all proposed adjacent to indicative Flood Zones 2 and 3, with POS proposed as a specific allocation in this area. As Water Compatible development, such strategic open space is compatible with land at high risk of flooding, however further assessment will be required to ensure that the mapping used to define the boundary between the POS and allocation for built development is accurate, especially once the new updated climate change allowances have been taken into consideration.'.*

5.13. As set out above, the council's approach will be to ensure that vulnerable development is located on areas of low flood risk on these sites. However, it has still applied to Sequential Test as set out in the NPPF and NPPG to steer new development to areas with the lowest risk of flooding from any source and ensure that other suitable and reasonably available with lower flood risk are not available.

6. The Sequential Test

6.1. As set out in Paragraph 168 of the NPPF:

'The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.'

6.2. The NPPG on Flood risk and coastal change clarifies that reasonably available sites are:

'Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.

These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'.

Paragraph: 028 Reference ID: 7-028-20220825

6.3. The Council's proposed Spatial Strategy, as set out in the Spatial Housing Strategy Topic Paper, is a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. This strategy delivers enough housing growth to provide a contribution of around 640 dwellings to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This strategy has been tested through the Sustainability Appraisal process and found to be a sustainable strategy.

6.4. Through being a capacity-led approach, the Council has allocated all suitable sites which accord with its spatial housing strategy (taking into account site specific constraints such as highways and other environmental constraints). This process is evidenced through the Housing Site Selection Topic Paper with individual site assessment pro-forms provided in Appendix 3 of that Topic Paper. Therefore, as set out in the Housing Site Selection Topic Paper, no other suitable sites which accorded with the Spatial Housing Strategy where considered suitable (other than those being allocated). No other sites which did not accord with the Spatial Housing Strategy performed so well in the site assessment process (as a whole, taking into account all relevant factors) as to warrant allocation. The Council therefore concludes that these sites are required for allocation within the local plan and that the council has assessed all alternative reasonably available sites, including those with a lower risk of flooding. It is considered that the sequential test has been passed.

7. The Exception Test

7.1. The Exception Test should only be applied following the application of the Sequential Test. As set out in the table on Flood risk vulnerability and flood zone 'incompatibility' above, it applies in the following instances:

- More vulnerable in Flood Zone 3a
- Essential infrastructure in Flood Zone 3a or 3b
- Highly vulnerable in Flood Zone 2 (this is NOT permitted in Flood Zone 3a or 3b)
- Any development in Surface Water Zone "b"

Information on flood risk vulnerability classification is provided in the NPPF Annex 3: Flood risk vulnerability classification.

7.2. Paragraph 170 of the NPPF states:

'The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.'

7.3. As set out in the Level 2 SFRA, out of the 5 sites being take forward for allocation, only the two strategic sites have a minor encroachment of flood zones 2 & 3 (which would require the Exception Test to be applied for specific types of development). As previously stated, the council's approach through Policy NB7 and the masterplanning process) will be to ensure that vulnerable development is located away from flood zones 2 & 3 on these sites. It is therefore considered that an Exception Test is not required for these sites at this stage.

7.4. As set out in paragraph 172 of the NPPF, it will be expected that the applicants would apply the Exception Test using a site specific SFRA at the application stage if required.

7.5. In relation to surface water risk, the Level 2 SRFA states at paragraph 3.4:

'Normally, the proportionate extent of surface water flood risk is less than can be the case for river or sea flooding. Surface water flood risk can also be of much shallower depth and is not normally experienced for such extensive durations as river or sea flooding. However, the safety implications of placing proposed development at locations where there is surface water flood risk together with the potential effects on third parties is a material consideration and thus if it is proposed to place development in an area of high surface water flood risk then consideration should be given to the demonstrating that part "b" of the Exception Test can be satisfied (in some instances, if the hazard posed by surface water risk is substantial and extensive then it might be necessary to consider alternative locations for development).'

7.6. In considering part 'b' of the Exception Test in relation to surface water for the proposed sites in South Staffordshire, the Level 2 SFRA states at paragraph 10.2.1: *'In principle, it is possible for all sites assessed in the Level 2 SFRA to pass the flood risk element of the Exception Test and for the principle of development to be supported'.* The report goes on to provide several examples of how this can be achieved. The Council has also specified that sites will meet the individual requirements set out in the site tables of the Level 2 SFRA.

7.7. With reference to Diagram 3 above, as previously described, the Sequential Test has been applied and has shown that there are no alternative reasonably available, lower risk sites, suitable for the proposed development to which the development could be steered. The Council will seek to ensure that vulnerable development is located on areas of low flood risk on the two strategic sites and an Exception Test is not required. As demonstrated through the Level 2 SFRA and the policy requirements in place, the sites are capable of being made safe throughout their lifetime, without increasing flood risk elsewhere. The sites can therefore be considered suitable for allocation.

Appendix 1 - Policy NB7: Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality

Policy NB7: Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality

1. Managing flood risk

New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3 will be required to provide sufficient evidence for the council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development meets the sequential test in an area of higher flood risk, it must be designed to be flood resilient and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents or users into account.

For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site-specific Flood Risk Assessment which meets the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account in accordance with the latest Environment Agency guidance.

All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 should set finished floor levels 600mm above the known or modelled at 1% and 3.3% annual exceedance probability (AEP) flood level, including an allowance for climate change in accordance with the latest National guidance. All new development in Flood Zones 2 and 3 should not adversely affect flood routing or result in a net loss of flood storage capacity that would increase flood risk elsewhere.

For developments located in areas at risk of fluvial flooding, safe access/egress must be provided in the form of a safe dry route for people as a minimum and vehicles wherever possible.

Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements. Development should not take place over or within 8m of culverted watercourses.

Where it is not always possible to direct development to sites with the lowest probability of flooding, the development should seek to minimise risk to the site and make the development resistant to any residual risk and make the development flood resilient. Opportunities should also be sought to reduce the overall level of flood risk

through the layout and form of development. Development should be designed to be safe throughout its lifetime, taking account of the potential impacts of climate change. Provision for emergency access and egress must also be included.

All developments should seek to provide wider betterment by demonstrating in site-specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes. The developer should consult with the relevant authority at the earliest opportunity

For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared.

Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.

2. Sustainable urban Drainage Systems (SuDS)

All new major development or developments involving large areas of hard standing (e.g. car parks) will incorporate SuDS appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable.

Sustainable drainage systems will be expected to reflect the design requirements and drainage hierarchy set out in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates.

SuDS design should be an integral part of the design and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application.

Only proposals which clearly demonstrate that a satisfactory SuDS layout with appropriate maintenance is possible, or compelling justification as to why SuDS should not be incorporated into a scheme, or are unviable, are likely to be successful. SuDS systems should be designed to ensure that it can be accessed for maintenance and operation requirements and that ongoing maintenance costs are economically proportionate.

The dual use of land for SuDS and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space and where SuDS will contribute towards an attractive and well landscaped environment where use as open space does not

compromise the efficient and effective functioning of the SuDS in the short or longer term.

Discharge should not be made into the combined sewer system and early engagement by the developer with Severn Trent Water Ltd will be required to ensure sustainably drained development.

3. Water quality

Development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water, or indirectly through the treatments of wastewater.

In order to protect and enhance water quality, all development proposals must demonstrate all of the following:

a) There are adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. Where development is being phased, each phase must demonstrate sufficient water supply and wastewater conveyance, treatment and discharge capacity.

b) The quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality, including denaturalisation of river morphology, and ecology.

c) Appropriate consideration is given to sources of pollution, and appropriate SuDS measures incorporated to protect water quality from polluted surface water runoff.

Foul drainage to a public sewer should be provided wherever possible, but where it is demonstrated that it is not feasible, alternative facilities must not pose unacceptable risk to water quality or quantity.

Development proposals should be consistent with other Local Plan policies.

Appendix 2: Severn Trent Water Sewer Capacity Assessment – March 2024

LPA Ref	Site Name	Units	Potential impact on sewerage infrastructure	Potential impact of surface water	Comment
SAD Site 379	Land off Ivetsey Road, Wheaton Aston	18	Low	Low	It is anticipated that these developments will have minimal impact on their surrounding wastewater infrastructure so long as surface water is managed sustainably and not discharged to the combined sewerage system. Please consult with our developer services team when more information is available.
213	Bilbrook House, Bilbrook	13	Low	Low	
730	Fishers Farm, Great Wyrley	10	Low	Low	
5	Land at Cherrybrook, Penkridge	88	Low	Low	
82	Land between A449 Stafford Rd & School Lane, Coven	48	Low	Low	
224	Land adjacent 44 Station Rd, Codsall	85	Low	Low	
313	Land off Himley Lane, Swindon	22	Low	Low	
397	Land adj to Brinsford Lodge, Brookhouse Lane, Featherstone	35	Low	Low	
416	Land off Orton Lane, Wombourne	79	Low	Low	
420	land North of Penkridge off A449 (East), Penkridge	29	Low	Low	
523	Land East of Wolverhampton Road, Cheslyn Hay	49	Low	Low	
617	Land off Four Ashes Road, Brewood	63	Low	Low	
036c	Land at Weeping Cross, Stafford	81	Low	Low	
119a	Land adjoining Saredon Road, Cheslyn Hay	60	Low	Low	
285, 562/415, 459	Land off Poolhouse Road, Wombourne	223	Low	Low	
6	Land at Boscomoor Lane, Penkridge	80	Low	Low	
251	Hall End Farm, Pattingham	17	Low	Low	
10	Land at Lower Drayton Farm (east of A449), Penkridge	750	Medium	Low	These development proposals are in areas where the existing sewerage infrastructure may be

LPA Ref	Site Name	Units	Potential impact on sewerage infrastructure	Potential impact of surface water	Comment
136	Land off Upper Landywood Lane (North), Gt Wyrley	109	Medium	Low	sensitive to receiving new or increased discharges. We strongly recommend contacting our developer service team to discuss proposals in more detail.
274	Land south of White Hill, Kinver	82	Medium	Low	
519	Land east of Bilbrook	848	Medium	Low	
584	Land North of Penkridge off A449	350	Medium	Low	
638	Loades PLC, Gt.Wyrley	29	Medium	Low	
704	Land off Norton Lane, Gt. Wyrley	31	Medium	Low	
419a&b	Land at Keepers Lane and Wergs Hall Rd, Codsall	317	Medium	Low	
536a	Land off Holly Lane Part 1, Gt Wyrley	84	Medium	Low	
SAD Site 136	Land at Landywood Lane, Gt.Wyrley	46	Medium	Low	
SAD Site 274	Land south of White Hill, Kinver	36	Medium	Low	
16	Land at Pear Tree Farm, Huntinton	39	Medium	Low	
SAD Site 228	Former Adult Training Centre off Histons Hill, Codsall	29	Low	Medium	We anticipate that sustainable methods for surface water discharge may be constrained in these locations. New or increased discharges of surface water to the combined sewerage network may result in hydraulic capacity issues such as sewer flooding. We strongly recommend contacting our developer service team to discuss proposals in more detail.
239	Land west Wrottesley Park Road (south), Perton	150	Medium	Medium	
SAD Site 139	Pool View, Churchbridge, Gt.Wyrley	46	Medium	Medium	
SAD Site 141	154a Walsall Road, Gt.Wyrley	31	Medium	Medium	