

NOTE TO FILE

JBA Project Code	2018s1436
Contract	Black Country Councils Level 1 SFRA
Client	Sandwell Metropolitan Borough Council
Day, Date and Time	10 th May 2019
Author	JBA Consulting
Subject	Site Screening Guidance Sheet



Site Screening Guidance Sheet

This provides guidance on how the Site Screening spreadsheets could be interpreted with regards to allocation of sites and to support (but not replace the need for) the Sequential Test

The table below outlines some criteria to determine whether development of a particular site should be considered further or not.

The following colour coded "levels of concern" are used in the table:

Showstopper – Applying the Sequential Test, seek to avoid these sites if at all possible

Advisory – Development may be possible with considerations outlined in the recommendations column

No concern – Development can occur based on this criterion

Note that the "Levels of concern" and recommendations are not based on any formal guidance or legislation and can be altered following a review. The LLFAs or EA may wish to offer an opinion on which thresholds to apply.

Note on the Sequential Test and approach: -

If allocating sites in Flood Zones 2 and 3, the Sequential Test will need to be applied. Further guidance on this will be provided in the SFRA. Essentially it will need to be proved based on wider planning reasons why a site needs to be allocated in a higher risk zone, having considered other sites at a lower risk of fluvial flooding. A sequential approach needs to be taken when considering all sources of flooding, both now and in the future.

Note that the climate change information for river systems is not yet available for the SFRA. When this is available the screening can be rerun.

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Flood risk source/ information source	Result	Level of concern	Recommendations
Fluvial - Flood Zones	>50% of site in Flood Zones (2 and 3)	Potential showstopper	Applying the Sequential Test, seek to avoid these sites if at all possible. Consider if the site is in an area benefitting from defences and the vulnerability of the development to flooding (NPPG Table 2)
	<50% of site in Flood Zones (2 and 3)	Advisory	Consider if the site is still viable taking into account the likely developable area and flood mitigation measures that may be necessary. Development can be considered however a Level 2 SFRA would be advised before development.
	Site Located in Flood Zone 1	Advisory	Development can occur based on this criterion, however catchments <3km ² in area are not covered by the Environment Agency Flood Zones and there may be a risk of flooding from small watercourses and/or other sources. These should be considered in conjunction with the DRN data and surface water data. The surface water data often highlights areas at risk of flooding from these smaller watercourses. Smaller watercourses in Walsall may also be covered by Flood Zones where this was run to inform the Local FRM Strategy (this will be covered further in the SFRA).
Surface Water – using either the national surface water map (Risk of Flooding from Surface Water)	>50% of site across all 3 surface water events	Potential showstopper	Further consultation should take place with the LLFA before allocation
	<50% of site across all 3 surface water events	Advisory	Development can be considered however a Level 2 SFRA would be advised before development. The LLFA may advise further consultation.
	0%	No concern	Development can occur based on this criterion.
Not yet incorporated: Within 20m of DRN (detailed river network) / Culverted watercourse routes and Culvert Blockage Modelling	>0%	Advisory	Sites located within 20m of the DRN line should not be ruled out of development. Where the DRN (i.e. a watercourse) goes through or adjacent to a site, the Flood Zones and surface water map should also be considered to further determine the impact on development. Where the DRN is located away from a site and land slopes down towards the site, development may be less appropriate than a site where land slopes down towards the watercourse and away from the site.
	0%	No concern/ advisory	Development can occur based on this criterion, however not all watercourses are mapped on the DRN, smaller drains may not be mapped and may need to be considered.

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Using the SFRA to apply the Sequential and Exception Tests to the Local Plan

This SFRA provides the main evidence required on flood risk to carry out the Sequential Test. This process also enables those sites that have passed the Sequential Test, and may require the Exception Test, to be identified. A Local Plan Sustainability Appraisal should be used to support any decision to locate development in higher flood risk areas in terms of wider strategic planning objectives.

The site screening provides an assessment of the flood risk associated with each of the Black Country Call for Sites and Wolverhampton's Strategic Housing Land Availability Assessment (SHLAA) sites, by illustrating the percentage of a site area within the Flood Zones and surface water flood extent.

It is recommended that planners use the site screening information and other information in the SFRA to apply the Sequential Test alongside wider strategic planning objectives as follows:

- 1 Using the information on the percentage of sites within the Flood Zones, can development be allocated into the lowest flood risk areas?
- 2 Using the information on other sources of flooding, can development be allocated into the lowest flood risk areas?
- 3 Using the information on climate change, is there likely to be a significant increase in flood risk due to climate change? They should form a judgement based on the likely lifetime of a development (e.g. 60 years for commercial and 100 years for residential) as to whether the site is likely to become at unacceptable risk of flooding over time.

Where there are flood defences (as will be shown on the maps in SFRA Appendix A), the results of the climate change modelling will not be directly comparable with the Flood Map for Planning, because it does not take the defences into account. Should a site rely heavily on defences for protection, a Level 2 SFRA is recommended that can explore in greater detail what the impact of climate change on flood hazard, depth and velocity over the lifetime of a development to inform the Exception Test, should this be required.

Having applied this analysis, should there be any sites allocated in areas of high flood risk, Table 3 of the NPPG should be consulted to see if the Exception Test would apply, with reference to the flood risk vulnerability of the development. If so, it is recommended that these sites proceed to a Level 2 SFRA to further advise on the likelihood of the allocation passing the Exception Test. In addition, sites that are at high risk of flooding from other sources and/ or where there may be significant impacts due to climate change would benefit from Level 2 SFRA.

Once the process has been completed, the LPA should then be able to allocate appropriate development sites through the Local Plan as well as prepare flood risk policy including the requirement to prepare site-specific FRAs for all allocated sites that remain at risk of flooding.