Sandwell
Metropolitan Borough Council

SANDWELL LOCAL PLAN
Site Assessment Report
Appendix E: Flood Risk Sequential and Exception Test

Sandwell Local Plan – Sequential and Exception Test – Addendum to SFRA (2024)

A Sequential and Exception Test of the Regulation 19 Sandwell Local Plan site allocations has been undertaken in accordance with the methodology prepared by JBA Consulting as set out in the Level 1 Strategic Flood Risk Assessment (SFRA, 2024). The methodology was prepared in accordance with National Planning Policy and Guidance on flood risk, including the Sequential Test and the Exception Test, and was agreed with the Environment Agency as part of the preparation of the Sandwell SFRA (2024). The Council has undertaken this Sequential and Exception Test as an addendum to the SFRA based on the most up to date flood risk data.

The Site Assessment process for the Sandwell Local Plan site allocations has also taken account of flood risk and this is detailed further in the Sandwell Local Plan Site Assessment Report (2024).

The Regulation 19 Sandwell Local Plan (2024) Policy SCC5 - Flood Risk sets out site specific flood risk assessment requirements in line with National Planning Policy and Guidance which should accompany relevant planning applications for any applicable sites identified within the SFRA and this Sequential and Exception Test addendum.

1.1 A site-specific Flood Risk Assessment, assessing all forms of flood risk would need to be carried out in addition at the application stage. The information provided in this document demonstrate that both Sequential and Exception Tests are satisfied for the purposes of plan making for all allocated sites.

1.2 The SFRA Level 1 (Section 3) document prepared by JBA provides detailed information to address Sequential and Exception Tests and applicants should use this information to inform their Flood Risk Assessment.

Sequential Test

The NPPF outlines that new development should be steered towards to areas with the lowest risk of flooding. 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 Sequential Test is applied during preparation of a Local Plan to steer the allocation of development sites towards areas of lowest flood risk. The strategic flood risk assessment Level 1 and Level 2 provides the basis for applying this Test.

For sites with fluvial and surface water flood risk, it's not possible to accommodate development in other lower risk sites as all those sites have already been identified or are not available. In summary, the Council considers the Sequential Test has been passed for all the proposed site allocations in the draft Local Plan and Policies Map.

Table 1: Sequential Test

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
SH1	Brown Lion Street	0.46	27 Houses	More Vulnerable	Surface Water – 0% in high and medium surface water zone; 2.09% low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has permission for 27 houses)	No
SH2	Land adjacent To Asda Wolverhampton Road, Oldbury	1.5	62 Houses	More Vulnerable	Surface Water – 1.86% is within the high risk surface water zone; 4.45% in the medium zone and 6.20% in low zone Flood Risk – 96.94% in FZ1 and 3.06% in FZ2.	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available. (NB site has application submitted for 60 homes)	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH4	Lower High Street (Station	0.28	20 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0% in medium	Yes - site within a sustainable development location	No

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	hotel & Dunns Site).				zone; 5.79% in low risk surface water zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH5	Mill Street, Great Bridge	0.88	40 Houses	More Vulnerable	Surface Water – 2.22% in high-risk surface water zone; 1.66% in medium zone; and 8.07% in low zone Flood Risk – 39.64% in FZ1; 60.33% in FZ2; 0.02% in FZ3. Proportion of the site is located within flood zone 3a plus the higher central climate change allowance of 30%	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available. (NB site has permission for 20 homes in NE; also, permission for 8 homes NW)	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH6	Swan Lane	3.77	147 Houses	More Vulnerable	Surface Water – 0.00% in high risk surface water zone; 1.92% in medium zone; 11.01% in low zone	Yes - site within a sustainable development location	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
					Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	(NB site has planning permission DC/22/66532 for 147 houses)	
SH7	The Boat Gauging House & Adjoining Land, Factory R	0.52	50 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 13.48% in medium zone; 7.4% in low zone Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has planning permission DC/21/65872 for 50 houses)	No
SH8	Alma Street, Wednesbury	0.54	23 Houses	More Vulnerable	Surface Water – 1.85% in low-risk surface water zone; 0% in medium and high zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH9	The Phoenix Collegiate, Friar Park Road, Wednesbury	4.8	105 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0.6% in medium zone; 2.11% in low zone Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has planning permission DC/23/68742 for 105 houses)	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
SH10	Tipton Conservative and Unionist Club, 64 Union St	0.14	14 Houses	More Vulnerable	Surface Water – 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH11	Sandwell District & General Hospital,	0.82	121 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0% in medium zone; 2.29% in low zone Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has planning permission for 121 homes)	No
SH13	Silverthorne Lane/ Forge Lane Cradley Heath	2.41	81 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0% in medium zone; 3.62% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH14	Langley Maltings, Western Road, Langley	2.72	71 Houses	More Vulnerable	Surface Water –11.13% in high risk surface water zone; 14.12% in medium zone; 20.89% in low zone.	Yes - site within a sustainable development location	No

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					Flood Risk - Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH15	Macarthur Road Industrial Estate Cradley Heath	0.3	13 Houses	More Vulnerable	Surface Water – 0% - in high and medium surface water risk zone; 3.33% in low zone. Flood Risk - Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB outline permission DC/15/58907 for wider site)	No
SH16	Cradley Heath Factory Centre, Woods Lane, Cradley	4.85	170 Houses	More Vulnerable	Surface Water – 0.36% in high risk surface water zone; 1.13% in medium zone; 5.94% in low zone Flood Risk - Flood Risk – 97.11% of the site is within Flood Zone 1. 2.86% in Flood Zone 2 and 0.03% in Flood Zone 3	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available. (NB outline permission DC/15/58907 for wider site)	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.

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SH17	Land adj to Droicon Estate, Portway Road, Rowley R	0.66	28 Houses	More Vulnerable	Surface Water – 0.06% in high risk surface water zone; 0.17% in medium zone; 8.01% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH18	STW/SMBC Land Friar Park	9.99	630 Houses	More Vulnerable	Surface Water – 2.69% in high-risk surface water zone; 3.14% in medium zone; 13.15% in low zone Flood Risk – 99.64% in Flood Zone 1; 0.36% in Flood Zone 2	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH19	Land at Horseley Heath, Alexandra Road, and Lower	2.26	45 Houses	More Vulnerable	Surface Water – 0.53% in high risk surface water zone; 0.69% in medium zone; 9.27% in low zone.	Yes - site within a sustainable development location	No

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					Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH20	Elbow Street, Old Hill	0.72	33 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 9.96% in medium zone; 35.8% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH21	Dudley Road East	2.65	90 Houses	More Vulnerable	Surface Water- 0% in high and medium risk surface water zone; 1.11% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH22	Tatbank Road Oldbury	1.15	52 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0.87% in medium zone; 8.40% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No

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SH23	28-64 High Street, West Bromwich	0.97	53 Houses	More Vulnerable	Surface Water – 0% on high and medium risk surface water zone; 3.09% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH24	Cokeland Place / Graingers Lane, Cradley Heath	0.36	16 Houses	More Vulnerable	Surface Water- 0% in high risk surface water zone; 0.01% in medium zone; 1.10% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH25	Bradleys Lane / High Street, Tipton	5.3	189 Houses	More Vulnerable	Surface Water – 0.80% in high risk surface water zone; 1.56% in medium zone; 5.13% in low zone Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH26	Lower City Road, Oldbury	2.33	73 Houses	More Vulnerable	Surface Water – 0.63% in high risk surface water zone; 0.97% in medium; 5.77% in low zone	Yes - site within a sustainable development location	No

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					Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH27	Site surrounding former Post office and Telephone	1.17	52 Houses	More Vulnerable	Surface Water – 0% in high and medium risk surface water zone; 1.44% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH28	Friar Street, Wednesbury	1.01	45 Houses	More Vulnerable	Surface Water – 0% in higher risk surface water zone; 2.76% in medium zone; 15.23% in low zone. Flood Zone – 78.92% in Flood Zone 1; 21.02% in Flood Zone 2; 0.06% in Flood Zone 3 Flood zone 3a plus higher central climate change allowance of 30% completely surrounds the site	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH29	Used Car Sales site on corner	0.57	23 Houses	More Vulnerable	Surface Water – 2.76% in high risk surface water zone; 29.59% in medium zone; 42.14% in low zone	Yes - site within a sustainable development location	No

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	of Lower Church Lane				Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH30	Land to east of Black Lake, west Bromwich	2.45	83 Houses	More Vulnerable	Surface Water – 0% in higher and medium risk surface water zone; 4.24% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH31	Summerton Road, Oldbury	0.89	36 Houses	More Vulnerable	Surface Water – 3.17% in high risk surface water zone; 2.37% in medium zone; 22.32% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH32	Bank Street (West), Hateley Heath	0.84	43 Houses	More Vulnerable	Surface Water – 0% in high and medium risk surface water area; 0.74% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No

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SH33	Wellington Road, Tipton	0.86	40 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 1.25% in medium zone; 2.28% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH34	Brandhall Golf Course	5.17	190 Houses	More Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH35	Rattlechain Site Land to the north of Temple Way,	9.99	518 Houses	More Vulnerable	Surface Water – 1.94% in high risk surface water zone; 18.94% in medium zone; 9.75% in low zone. Flood Risk – 97.94% in flood zone 1; 2.05% in flood zone 2; 0.01% in flood zone 3.	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.

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SH36	Land between Addington Way and River Tame, Temple	0.89	36 Houses	More Vulnerable	Surface Water – 1.65% in high risk surface water zone; 2.39% in medium zone; 7.19% in low zone. Flood Risk – 67.07% in Flood Zone 1; 32.83% in Flood Zone 2; 0.10% in Flood Zone 3. A proportion of the site is in flood zone 3b (albeit a small proportion) and the flood zone 3a plus 30% climate change extent have some impact and proportion along the eastern boundary.	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH37	Edwin Richards Quarry, Portway Road, Rowley Regis	9.99	626 Houses	More Vulnerable	Surface Water – 1.34% in high risk surface water zone; 1.82% in medium zone; 6.21% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location Permission for battery storage; Permission for 278 homes in southern part of site.	No
SH38	Brades Road, Oldbury	1.19	51 Houses	More Vulnerable	Surface Water – 1.13% in high risk surface water zone; 1.24% in medium zone; 25.69% in low zone.	Yes - site within a sustainable development location	No

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					Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH40	Langley Swimming Centre, Vicarage Road, Oldbury	0.49	20 Houses	More Vulnerable	Surface Water – 3.86% in high risk surface water zone; 17.07% in medium zone; 50.85% in low zone Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH41	North Smethwick Canalside	8.77	500 Houses	More Vulnerable	Surface Water – 0.52% in high risk surface water zone; 1.57% in medium zone; 6.02% in low. Flood Risk – 98.97% in Flood Zone 1; 1.03% in Flood Zone 2; 0% in Flood Zone 3	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH42	The Forge Tavern, Junction	0.14	10 Houses	More Vulnerable	Surface Water – 0% in high and medium risk surface water zone; 9.59% in low zone.	Yes - site within a sustainable development location	No

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	Franchise Street and B				Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH43	Land of Tanhouse Avenue, Great Barr	1.66	46 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0.17% in medium zone; 22.96% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH44	Wyndmill crescent, West Bromwich	0.19	11 Houses	More Vulnerable	Surface Water- 0% in high and medium risk surface water zone; 1.12% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH45	Site of 30-144 Mounts Road, Wednesbury	1.07	45 Houses	More Vulnerable	Surface Water – 1.16% in high risk surface water zone; 2.76% in medium zone; 7.65% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has pp for 24 homes and is under construction)	No

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SH47	Site Of Former Stone Cross Neighbourhood Office	0.28	14 Houses	More Vulnerable	Surface Water – 4.98% in high risk surface water zone; 0.49% in medium zone; 4.84% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has permission for 14 homes)	No
SH49	St Johns St, Carters Green	0.82	33 Houses	More Vulnerable	Surface Water – 4.45% in high risk surface water zone; 4.38% in medium zone; 4.84% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH50	Tentec, guns lane	0.6	126 Houses	More Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB has permission for 125 homes)	No
SH51	Providence Place / Bratt St	0.74	40 Houses	More Vulnerable	Surface Water – 0% in high risk surface water zone; 0.06% in medium zone; 2.09% in low zone.	Yes - site within a sustainable development location	No

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					Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH52	Overend street, West Bromwich	0.71	70 Houses	More Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB has permission for 125 homes)	No
SH53	Grove Lane/ Cranford Street/ London Street	1.23	500 Houses	More Vulnerable	Surface Water- 0% in high risk surface water zone; 0.01% in medium zone; 3.19% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH54	Cranford Street / Heath Street / Canal	4.99	115 Houses	More Vulnerable	Surface Water- 10.65% in high risk surface water zone; 11.43% in medium zone; 28.62% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH55	Cape Arm Cranford Street	2.13	170 Houses	More Vulnerable	Surface Water- 2.90% in high risk surface water zone; 5.83% in medium zone; 81.46% in low zone.	Yes - site within a sustainable development location	No

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					Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SH56	Moilliett Street Park - Grove Lane masterplan	0.77	35 Houses	More Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH57	Grove Street / MMUH / School - Grove Lane MP	2.18	85 Houses	More Vulnerable	Surface Water – 1.07% in high risk surface water zone; 0.84% in medium zone; 3.52% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH58	Abberley Street Grove Lane Master Plan	2.48	140 Houses	More Vulnerable	Surface Water- 0.7% in high risk surface water zone; 0.16% in medium zone; 9.27% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No

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SH59	Beever Road	0.83	18 Houses	More Vulnerable	Surface Water – 0% in high and medium risk surface water zone; 5.15% in low zone. Flood Risk – 46.35% in flood zone 1; 53.47% in flood zone 2; 0.18% in flood zone 3	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available. Site has permission for 18 homes and is under construction	Yes – Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.
SH61	Thandi Coach Station	0.45	58 Houses	More Vulnerable	Surface Water- 3.18% in high risk surface water zone; 7.89% in medium zone; 56.79% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location (NB site has permission for 58 homes and work has started on site)	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
SH62	Star and Garter, 252 Duchess Parade, West Bromwich	0.05	60 Houses	More Vulnerable	Surface Water- 0% in high and medium risk surface water zone; 14.67% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH63	192-200 Dudley Road, Oldbury	0.58	24 Houses	More Vulnerable	Surface Water – 0% in high and medium risk surface water zone; 5.70% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH64	Windmill House, Windmill Lane, Smethwick	0.21	10 Houses	More Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SH65	Smethwick Police Station, Piddock Road, Smethwick		10 Houses	More Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
SH66	Wednesbury Police Station, Albert Street, Wednesbury	0.33	15 Houses	More Vulnerable	Surface Water- 0% in high and medium risk surface water zone; 0.01% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SM1	Chances Glass Works	0.64	Mixed Use – 276 houses 7208 sqm workspace 779 sqm heritage centre 1ha open space	More Vulnerable / Less Vulnerable	Surface Water- 0.49% in high risk surface water zone; 0.90% in medium zone; 6.54% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SM2	Lion Farm	0	Mixed Use - 200 houses Retention of six sports pitches with changing facilities and car parking – 5ha Employment – 2.3ha	More Vulnerable / Less Vulnerable	Surface Water – 1.72% in high risk surface water zone; 6.07% in medium zone; 17.10% in low zone. Flood Risk – 90.61% in Flood Zone 1; 9.32% in Flood Zone 2; 0.07% in Flood Zone 3	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for	Yes – Exception Test on page 37.

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
						other development or are not available.	
SM3	Evans Halshaw car showroom	0.89	Mixed Use – 140 houses Ancillary commercial – 7 units (approx. 2,000m2 total)	More Vulnerable / Less Vulnerable	Surface Water- 0.06% in high risk surface water zone; 1.18% in medium zone; 4.76% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SM4	Army Reserve, Carters Green	1.17	Mixed Use – 63 houses Ancillary commercial – 4 units (approx. 1,000m2 total)	More Vulnerable / Less Vulnerable	Surface Water- 1.33% in high risk surface water zone; 3.11% in medium zone; 6.39% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SM5	Cultural quarter, West Bromwich	1.09	Mixed Use – 52 houses Food and Beverage – 1,054m2 Community / Leisure – 2,000m2 Parking – 10 spaces	More Vulnerable / Less Vulnerable	Surface Water- 0% Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
SM6	Queens Square Living	3.06	Mixed Uses – 396 houses Retail – 7,447m2 Offices – 855m2 Community / Leisure – 1,395m2 Parking – 206 spaces	More Vulnerable / Less Vulnerable	Surface Water- 0.41% in high risk surface water zone; 0.81% in medium zone; 5.41% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SM7	West Bromwich Central	4.53	Mixed Use – 343 houses Retail – 2,302m2 Offices – 5,032m2 Educational – 5,060m2 Food and Beverage – 11,840m2 Community / Leisure – 9,862m2 Health – 5,205m2 Parking – 625 spaces	More Vulnerable / Less Vulnerable	Surface Water- 1.87% in high risk surface water zone; 2.13% in medium zone; 9.04% in low zone. Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SM8	George Street Living	2.36	Mixed Use - 327 houses Community / Leisure – 1,150m2	More Vulnerable / Less Vulnerable	Surface Water- 0.01% in high risk surface water zone; 0.93% in medium zone; 2.44% in low zone.	Yes - site within a sustainable development location	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
			Parking – 79 spaces		Flood Risk – 100% of the site is within Flood Zone 1. No climate change impact.		
SG1	Brierley Lane, Tipton	0.75	Existing G&T site, 16 pitches		Surface Water – 8.31% in high risk surface water flood zone; 5.74% in medium zone; 17.81% in low zone. Flood Zone - 100% of the site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SG2	Brierley Lane, Tipton	0.62	Vacant Site – 10 Pitches		Surface Water – 0% in high risk surface water zone; 4.18% in medium zone; 6.13% in low zone. Flood Zone - 100% of the site is within Flood Zone 1. No climate change impact	Yes - site within a sustainable development location	No
SEC1-1	Whitehall Road, Tipton	5.3	Mixed employment use	Less Vulnerable	Surface Water – 2.80% of the site is within a high-risk zone; 4.30% is within a medium risk zone; 12.61% is within a low-risk zone. Flood Zone – 100% of site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
SEC1-2	British Gas, Land off Dudley Road, Oldbury	1.05	Mixed employment use	Less Vulnerable	Surface Water – 0% of the site is within a high-risk zone; 1.67% is within a medium risk zone; 14.43% is within a low risk zone. Flood Zone – 100% of site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SEC1-3	Junction Two, Oldbury	1.12	Mixed employment use	Less Vulnerable	Surface Water – 0% is within a high-risk surface water zone; 0.05% is within a medium risk zone; 7.24% is within a low risk zone. Flood Zone – 100% of site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SEC1-4	Coneygre Business Park	7.22	Mixed employment use	Less Vulnerable	Surface Water – 1.04% is within a high risk surface water zone; 0.78% is within a medium risk zone; 7.13% is within a low risk zone.	Yes - site within a sustainable development location	No

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
					Flood Zone – 100% of site is within Flood Zone 1. No climate change impact.		
SEC1-5	Site off Bilport Lane, Wednesbury	5.29	Mixed employment use	Less Vulnerable	Surface Water – 1.28% is within a high risk surface water zone; 1.11% is within a medium risk zone; 4.72% is within a low risk zone. Flood Zone – 100% of site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	Yes – Exception Test on page 34.
SEC1-6	Brandon Way / Albion Road	1.54	Mixed employment use	Less Vulnerable	Surface Water – 8.99% is within a high risk surface water zone; 8.88% is within a medium risk zone; 21.17% is within a low risk zone. Flood Zone – 100% of site is within Flood Zone 1. No climate change impact.	Yes - site within a sustainable development location	No
SEC1-7	Legacy 43, Ryder Street, West Bromwich	0.88	Mixed employment use	Less Vulnerable	Surface Water – 0.57% is within a High-Risk Surface Water Zone. 2.32% of site is within a medium	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the	Yes – Exception Test would be applicable at the planning application stage if the applicant

Site Ref	Site Name	Area (ha)	Proposed Development	Vulnerability	Flood Risk from all sources now & in the future *Surface Water:* *Low risk – between 0.1 and 1% risk per year* *Medium risk – between 1 and 3.3% risk per year* *High Risk – greater than 3.3% risk each year*	Can development be steered towards an area at lower risk?	Exception Test Required?
					risk zone. 17.13% of site is within a Low-risk zone. Flood Zone – 95.01% is within Flood Zone 1; 3.81% is within Flood Zone 2; 1.18% is within Flood Zone 3.	proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	chooses not to steer all built development to areas of flood zone 1.
SEC1-8	Roway Lane, Oldbury	3.65	Mixed employment use	Less Vulnerable	Surface Water – 0.57% is within a high risk surface water zone; 2.32% is within a medium zone; 17.13% is within a low risk zone. Flood Zone – 95.01% within Flood Zone 1; 3.81% within Flood Zone 2; 1.18% within Flood Zone 3.	The Council has identified all reasonably available sites that have a lower risk of flooding from all sources in the proposed site allocations. It is not possible to accommodate the proposed development in a more suitable area with lower flood risk, as all lower risk sites have already been identified for other development or are not available.	Yes – Exception Test on page 31.

Exception Test

Where it has been demonstrated that a site has passed the Sequential Test, a further test, the 'Exception Test' has to be satisfied. At least 80% of all sites are within Environment Agency's (EA's) Flood Zone 1, with no risk of fluvial flooding in these areas. The remaining sites are affected by one or more of flood zones 2, 3a or 3b. Out of the all the sites, some were deemed to require the Exception Test. The Exception Test have been done for the 3 sites that were selected for Sandwell Level 2 Strategic Flood Risk Assessment. For the remaining sites, an Exception Test would be applicable at the planning application stage if the applicant chooses not to steer all built development to areas of flood zone 1.

To pass the Exception Test, it must be shown that the development will provide wider sustainability benefits that outweigh the risk, and that the development will be safe throughout its lifetime without increasing risk elsewhere. The former is a planning-related consideration and the Level 2 SFRA helps to answer the latter part of the test.

The Level 1 SFRA (2024), Section 3.2.2, explains in more detail the requirements of the Sequential Test:

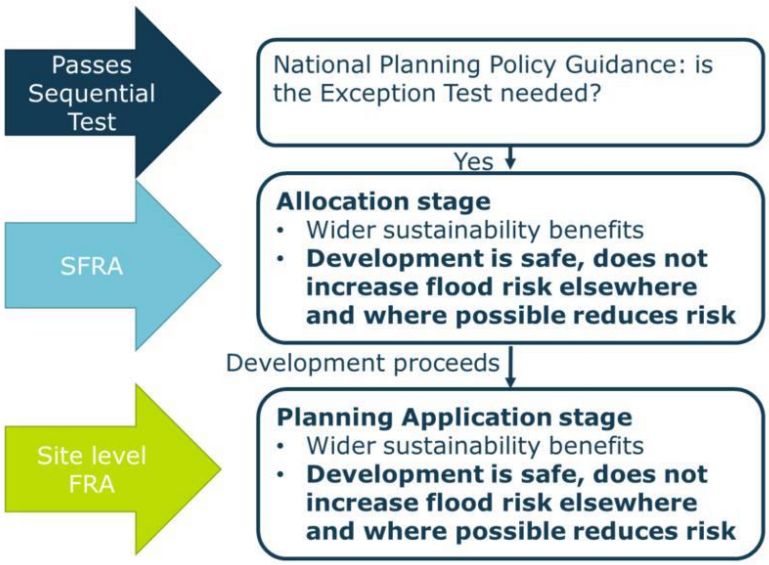
"It will not always be possible for all new development to be located on land that is not at risk from flooding. To further inform whether land should be allocated, or Planning Permission granted, a greater understanding of the scale and nature of the flood risks is required. In these instances, the Exception Test will be required.

The Exception Test should only be applied following the application of the Sequential Test. It applies in the following instances:

- 'More vulnerable' development in Flood Zone 3a
- 'Essential infrastructure' in Flood Zone 3a or 3b
- 'Highly vulnerable' development in Flood Zone 2
- *Any development where a higher risk of surface water has been identified (surface water Zone B) and the site does not clearly show that development can be achieved away from the flood risk.*

'Highly vulnerable' development should not be permitted within Flood Zone 3a or Flood Zone 3b. 'More vulnerable' and 'Less vulnerable' development should not be permitted within Flood Zone 3b.

Figure 1 below summarises the Exception Test.



For sites proposed for allocation within the Local Plan, the LPA should use the information in this SFRA to inform the Exception Test. At the planning application stage, the developer must design the site such that it is appropriately flood resistant and resilient in line with the recommendations in national and local planning policy and supporting guidance and those set out in this SFRA. This should demonstrate that the site will still pass the flood risk element of the Exception Test based on the detailed site level analysis.

For developments that have not been allocated in the Local Plan, developers must undertake the Exception Test and present this information to the LPA for approval. The Level 1 SFRA can be used to scope the flooding issues that a site-specific FRA should investigate in more detail to inform the Exception Test for windfall sites.

There are two parts to demonstrating a development passes the Exception Test:

1.Demonstrating that the development would provide wider sustainability benefits to the community that outweigh the flood risk.

At the stage of allocating development sites, LPAs should consider wider sustainability objectives, such as those set out in Local Plan Sustainability Appraisals. These generally consider matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health, transport etc.

The LPA should consider the sustainability issues the development will address and how far doing so will outweigh the flood risk concerns for the site, e.g. by facilitating wider regeneration of an area, providing community facilities, infrastructure that benefits the wider area etc.

2.Demonstrating that 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.

In circumstances where the potential effects of proposed development are material a Level 2 SFRA is likely to be needed to inform the Exception Test for strategic allocations to provide

evidence that the principle of development can be supported. At the planning application stage, a site-specific FRA will be needed. Both will need to consider the actual and residual risk and how this will be managed over the lifetime of the development.

The information contained within the SA and SHLAA/ EDNA has been used to determine whether sites pass the first part of the Exception Test. The information contained in the Level 2 SFRA (2024) has informed assessment of the second part of the Exception Test. This has been summarised in each assessment in the following section, but this report should be read in conjunction with the SA, SHLAA/ EDNA, Level 2 SFRA, and the detailed allocation policies and development guidelines in the Proposed Submission Local Plan Update.

EMP2-3: Direct 2, Roway Lane
EXCEPTION TEST
As the site is within Flood Zone 3 and Flood Zone 2, classified as 'Less vulnerable', the Exception Test is not required for this site. However, given the significant surface water risk to the site, the LPA should carefully weigh the benefits of developing the site against the risk, and satisfy themselves that site users can be kept safe throughout its lifetime.
<u>Does the development provide wider sustainability benefits to the community that outweigh flood risk?</u> The site is located to the south of Roway Lane, which borders the northern site boundary. The site is in a predominantly urban area, with housing to the west and south of the site and a construction site to the east. The site is in a sustainable location within easy walking distance of services and facilities to meet daily needs. Whilst constraints are present, these are considered capable of being addressed within a development. The site contributes towards the spatial strategy of directing development towards the more sustainable settlements in the borough. The SFRA identifies 'Implementation of SuDS at the site could provide opportunities to deliver multiple benefits including volume control, water quality, amenity and biodiversity. This could provide wider sustainability benefits to the site and surrounding area.'
<u>Will the development be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk</u> The site is not at risk of fluvial present-day flooding. The site is shown to be at risk of pluvial flooding in the 1% AEP plus 40% climate change and 0.1% AEP event. More detailed hydraulic modelling of the site is required as the fluvial data for the River Tame is a 1D-only model and a proxy was used for Flood Zone 3b plus Climate Change. There is also access and egress issues with the 0.1% AEP surface water event and the design surface water event (1% AEP plus 40% climate change allowance). The site is considered to be at residual risk of canal overtopping or breach. The Level 2 SFRA provides the following guidance for site design and making development safe: • The developer will need to show, through an FRA, that future users of the development will not be placed in danger from flood hazards throughout its lifetime. It is for the applicant to show that the development meets the objectives of the NPPF's policy on flood risk. For example, how the operation of any mitigation measures can be safeguarded and maintained effectively through the lifetime of the development. (Para 048 Flood Risk and Coastal Change PPG). • Should built development be proposed within the 0.5% AEP tidal breach extent or 1% AEP surface water flood extent, careful consideration will need to be given to flood resistance and resilience measures. • The risk from surface water flow routes should be quantified as part of a site-specific FRA, including a drainage strategy, so runoff magnitudes from the development are not increased by development across any ephemeral surface water flow routes. A drainage strategy should help inform site layout and design to ensure runoff rates are as close as possible to greenfield rates.

- Arrangements for safe access and egress will need to be demonstrated for the 1% AEP pluvial events with an appropriate allowance for climate change, using the depth, velocity, and hazard outputs.
- Consultation with RMAs early on should be implemented to ensure an appropriate flood evacuation plan is put in place for the site.
- Flood resilience and resistance measures should be implemented where appropriate during the construction phase, e.g. raising of floor levels. These measures should be assessed to make sure that flooding is not increased elsewhere. If the floor levels cannot be raised to meet the minimum requirements, developers will need to: raise them as much as possible.
    - consider moving vulnerable uses to upper floors.
    - include extra flood resistance and resilience measures.

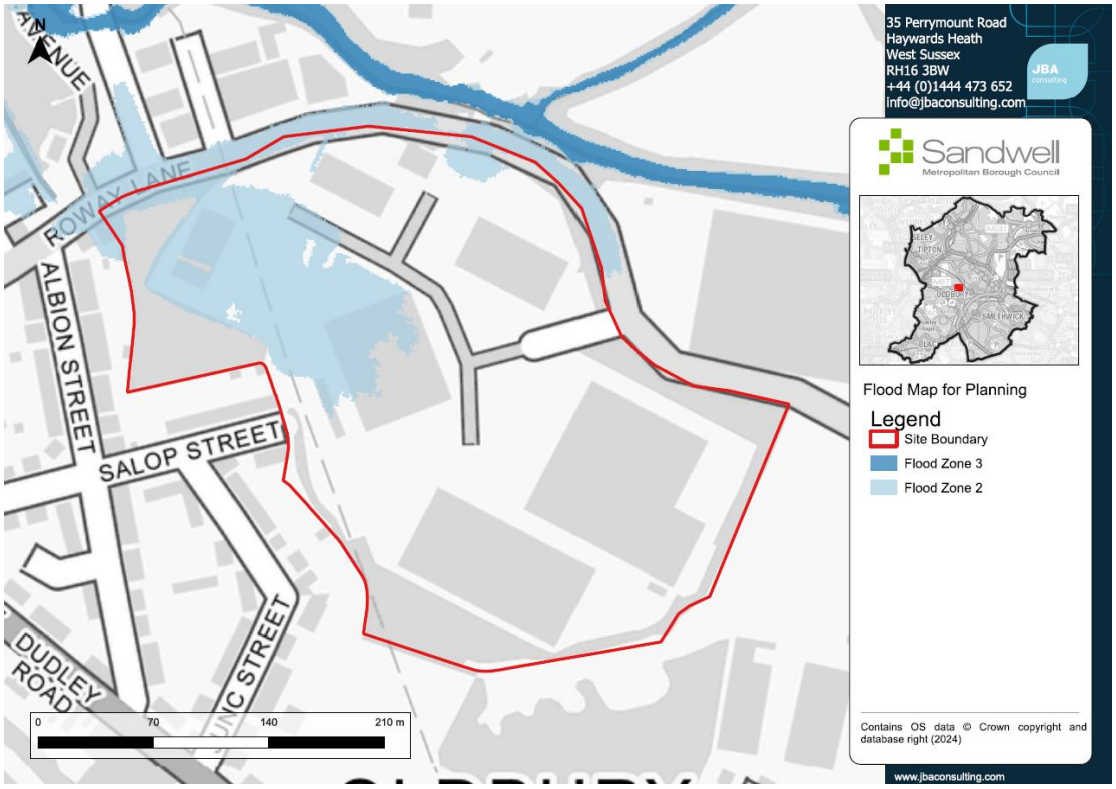
Additionally, the key messages from the Level 2 SFRA are that development on site is likely to be able to proceed if:

- To locate new development in areas of lowest risk, in line with the Sequential Test, by steering sites to river Flood Zone 1 and avoiding where possible areas with a high risk of surface water flooding. If a Sequential Test is undertaken and a site at flood risk is identified as the only appropriate site for the development, the Exception Test shall be undertaken. If development can't be avoided in a high-risk surface water Zone, then part "b" of the Exception Test should be satisfied.
- A carefully considered and integrated flood resilient and sustainable drainage design is put forward, with development to be steered away from the areas identified to be at risk of surface water flooding within the site.
- A site-specific Flood Risk Assessment that demonstrates that site users will be safe in the design surface water events, including an allowance for climate change. This will need to show that the site is not at an increased risk of flooding in the future and that development of the site does not increase the risk of surface water flooding on the site and to neighbouring properties.
- A site-specific Surface Water Drainage Strategy, and SuDs maintenance and management plan is submitted along with the FRA.
- Raise residential and commercial finished floor levels 300mm above the 1 in 100-year plus climate change flood level. Protect and promote areas for future flood alleviation schemes.
- If flood mitigation measures are implemented then they are tested to ensure that they will not displace water elsewhere (for example, if land is raised to permit development on one area, compensatory flood storage will be required in another).

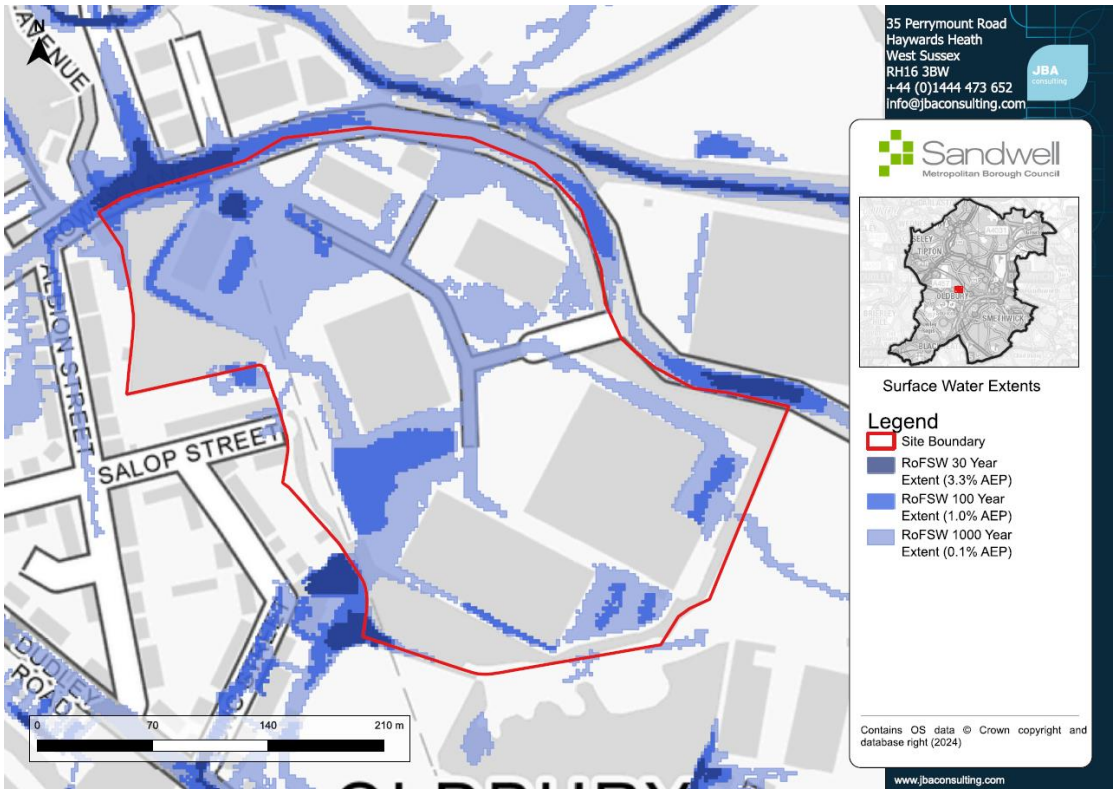
Having considered the advice contained within the SFRA, the following development guidelines are proposed in relation to the site:

- Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime.
- The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding, it will be important to consider access/egress to all parts of the site.

Conclusion
The site has been demonstrated to pass the Exception Test for allocation for employment use as it offers wider sustainability benefits and is capable of being made safe for its lifetime. This conclusion has been informed by engagement with the LLFA. Further consultation with the LLFA will be undertaken as proposals develop.



Flood Map for EMP2-3: Direct 2, Roway Lane



Surface Water Extents Map for EMP2-3: Direct 2, Roway Lane

SEC1-5: Site off Bilport Lane, Wednesbury
EXCEPTION TEST
Whilst part of the site is within Flood Zone 3 and Flood Zone 2, the proposed use is classified as 'Less vulnerable', and the Exception Test is not required for this site. However, due to the nearby canals Site off Bilport Lane (SEC1-5) have residual risk and is at risk of surface water flooding in the present day and climate change scenarios. The LPA should carefully weigh the benefits of developing the site against the risk and satisfy themselves that site users can be kept safe throughout its lifetime.
<u>Does the development provide wider sustainability benefits to the community that outweigh flood risk?</u> The site is located to the west of Bilport Lane. The site is in an urban area, with industrial land to the north, west, south and east. The site is in a sustainable location within easy walking distance of services and facilities to meet daily needs. Whilst constraints are present, these are considered capable of being addressed within a development. The site contributes towards the spatial strategy of directing development towards the more sustainable settlements in the borough. The SFRA identifies 'The use of multistage SuDS treatment will clean and improve water quality of surface water runoff discharged from the site and reduce the impact on receiving water bodies.'
<u>Will the development be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk</u> The northern boundary of the site is at risk of fluvial flooding in the present day. Flood extents are similar for fluvial flooding plus climate change; however, flooding is also present along a small section of the eastern boundary. More detailed hydraulic modelling of the site is required as the fluvial data for the River Tame is a 1D-only model and a proxy was used for Flood Zone 3b plus Climate Change. The site is shown to be at risk of pluvial flooding in the 1% AEP and 0.1% AEP event. The site is considered to be at residual risk of canal overtopping or breach. The site is considered 'Less Vulnerable' therefore the Exception Test is not required, however the Sequential Test must still be applied. The Level 2 SFRA provides the following guidance for site design and making development safe: • The developer will need to show, through an FRA, that future users of the development will not be placed in danger from flood hazards throughout its lifetime. It is for the applicant to show that the development meets the objectives of the NPPF's policy on flood risk. For example, how the operation of any mitigation measures can be safeguarded and maintained effectively through the lifetime of the development. (Para 048 Flood Risk and Coastal Change PPG). • Development should be steered away from areas at greatest risk, namely along the northern boundary where there is fluvial risk form the River Tame. • The risk from surface water flow routes should be quantified as part of a site-specific FRA, including a drainage strategy, so runoff magnitudes from the development are not increased by development across any ephemeral surface water flow routes. A drainage strategy should help inform site layout and design to ensure runoff rates are as close as possible to greenfield rates.

- Access and egress are shown to be impeded in the 1% and 0.1% AEP surface water events and careful consideration will need to be given to how safe access/egress can be maintained.
- Consultation with RMAs early on should be implemented to ensure an appropriate flood evacuation plan is put in place for the site.
- Flood resilience and resistance measures should be implemented where appropriate during the construction phase, e.g. raising of floor levels. These measures should be assessed to make sure that flooding is not increased elsewhere. If the floor levels cannot be raised to meet the minimum requirements, developers will need to:
  - raise them as much as possible.
  - consider moving vulnerable uses to upper floors.
  - include extra flood resistance and resilience measures.

Additionally, the key messages from the Level 2 SFRA are that development on site is likely to be able to proceed if:

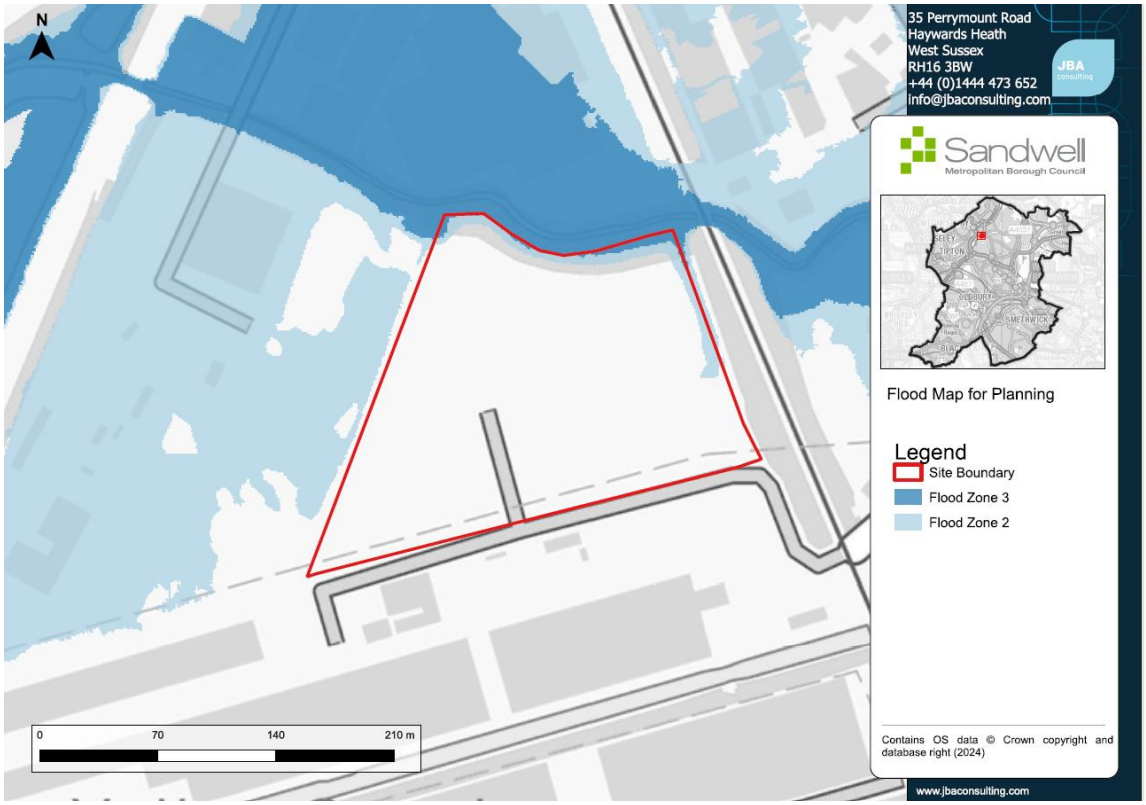
- To locate new development in areas of lowest risk, in line with the Sequential Test, by steering sites to Flood Zone 1 and avoiding where possible areas with a high risk of surface water flooding.
- A carefully considered and integrated flood resilient and sustainable drainage design is put forward. A site-specific Surface Water Drainage Strategy, and SuDs maintenance and management plan is submitted along with the FRA.
- There are access and egress issues with the 1% AEP, 0.1% AEP surface water event and the design surface water event (1% AEP plus 40% climate change allowance). Safe access and egress will need to be demonstrated in the 1% AEP fluvial and surface water events including an appropriate allowance for climate change.
- A site-specific Flood Risk Assessment demonstrates that site users will be safe in the design surface water and fluvial events, including an allowance for climate change. This will need to show that the site is not at an increased risk of flooding in the future and that development of the site does not increase the risk of surface water flooding on the site and to neighbouring properties.
- If flood mitigation measures are implemented then they are tested to ensure that they will not displace water elsewhere (for example, if land is raised to permit development on one area, compensatory flood storage will be required in another).

Having considered the advice contained within the SFRA, the following development guidelines are proposed in relation to the site:

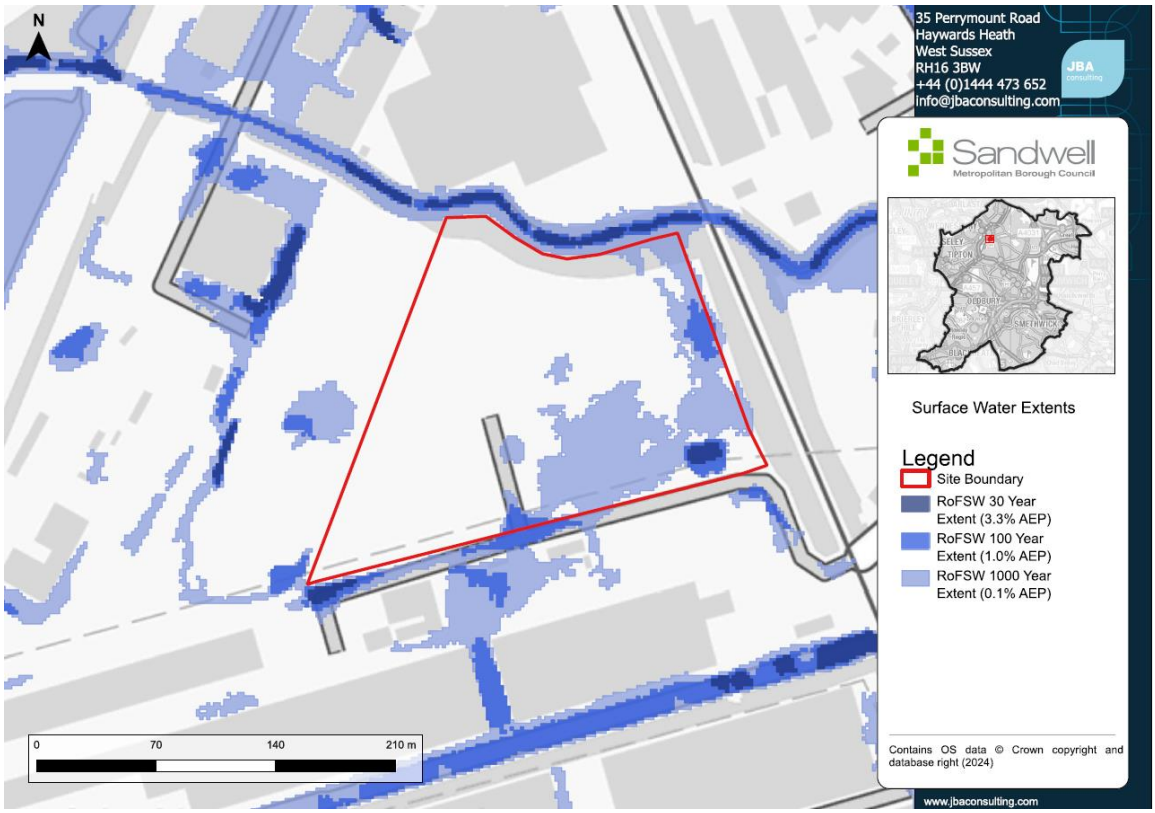
- Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime.
- The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding.

Conclusion

The site has been demonstrated to pass the Exception Test for allocation for employment use as it offers wider sustainability benefits and is capable of being made safe for its lifetime. This conclusion has been informed by engagement with the LLFA. Further consultation with the LLFA will be undertaken as proposals develop.



Flood Map for SEC1-5: Site off Bilport Lane, Wednesbury



Surface Water Extents Map for SEC1-5: Site off Bilport Lane, Wednesbury

SM2: Lion Farm Estate
EXCEPTION TEST
As the site is within Flood Zone 3 and Flood Zone 2, classified as 'More Vulnerable' and has some surface water flood risk, the Exception Test is required for this site.
Does the development provide wider sustainability benefits to the community that outweigh flood risk? The site is located in the south-west of Sandwell, with Oldbury to the north and Rowley Regius to the south. The site is located to the south of Wolverhampton Road (A4123), which borders the site's northern boundary. The site is currently a green space, with an industrial estate bordering the eastern boundary and residential areas to the south and west. The site is in a sustainable location within easy walking distance of services and facilities to meet daily needs. Whilst constraints are present, these are considered capable of being addressed within a development. The site contributes towards the spatial strategy of directing development towards the more sustainable settlements in the borough. The SFRA identifies 'The use of multistage SuDS treatment will clean and improve water quality of surface water runoff discharged from the site and reduce the impact on receiving waterbodies.'
Will the development be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk The north-east of the site is at risk of fluvial flooding in the present day. Flood extents are similar for fluvial flooding plus climate change, situated around Whiteheath Brook. The site is shown to be at risk of pluvial flooding in the 3.3%, 1% and 0.1% AEP events. The site is considered to be at residual risk of flooding from Whiteheath Brook. The site is considered to be 'More Vulnerable' due to the proposed residential development within the site plan, therefore the Exception Test is required once the Sequential Test has been applied. The Level 2 SFRA provides the following guidance for site design and making development safe: • Development should be steered away from areas at greatest risk, namely around the north-east of the site where Whiteheath Brook flows. • The risk from surface water flow routes should be quantified as part of a site-specific FRA, including a drainage strategy, so runoff magnitudes from the development are not increased by development across any ephemeral surface water flow routes. A drainage strategy should help inform site layout and design to ensure runoff rates are as close as possible to greenfield rates. • Should the presence of culverted watercourses be confirmed on site, ideally these should be opened up as part of development proposals to reduce flood risk and provide wider environmental benefits. • Access and egress are shown to be impeded in both the 1% and 0.1% AEP surface water events and careful consideration will need to be given to how safe access/egress can be maintained. • Consultation with RMAs early on should be implemented to ensure an appropriate flood evacuation plan is put in place for the site. • Flood resilience and resistance measures should be implemented where appropriate during the construction phase, e.g. raising of floor levels. These measures should be assessed to

make sure that flooding is not increased elsewhere. If the floor levels cannot be raised to meet the minimum requirements, developers will need to:

- raise them as much as possible.
- consider moving vulnerable uses to upper floors.
- include extra flood resistance and resilience measures.

Additionally, the key messages from the Level 2 SFRA are that development on site is likely to be able to proceed if:

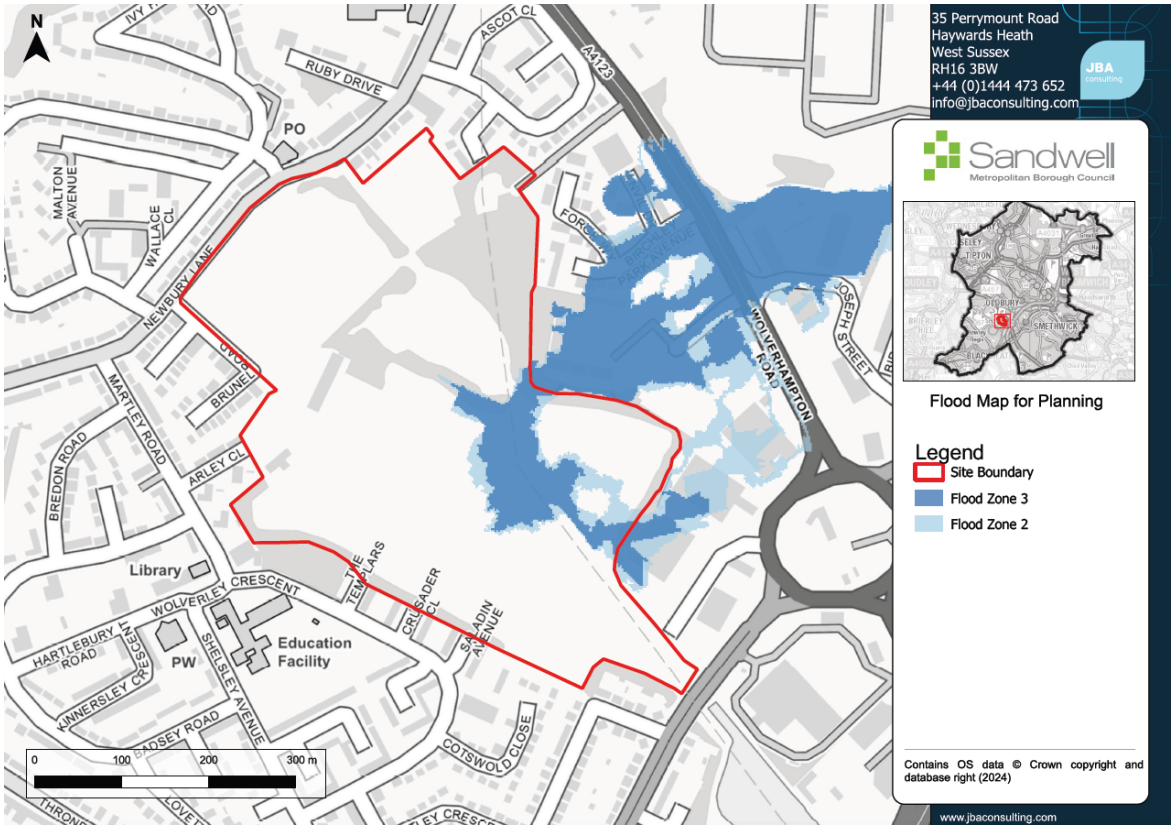
- A site-specific Flood Risk Assessment demonstrates that site users will be safe in the design surface water and fluvial events, including an allowance for climate change. This will need to show that the site is not at an increased risk of flooding in the future and that development of the site does not increase the risk of surface water flooding on the site and to neighbouring properties. This should include investigations into the layout of potential culverted watercourses on the site, and detailed modelling of the watercourse considering the true watercourse arrangement. Ideally any culverted watercourses would be opened up as part of development proposals.
- Development should be located in areas of lowest risk, in line with the Sequential Test, by steering sites to river Flood Zone 1 and avoiding where possible areas with a high risk of surface water flooding. If a Sequential Test is undertaken and a site at flood risk is identified as the only appropriate site for the development, the Exception Test shall be undertaken. If development can't be avoided in a high-risk surface water Zone, then part "b" of the Exception Test should be satisfied.
- Raise residential and commercial finished floor levels 300mm above the 1 in 100-year plus climate change flood level. Protect and promote areas for future flood alleviation schemes.
- A carefully considered and integrated flood resilient and sustainable drainage design should be put forward and a site-specific Surface Water Drainage Strategy, and SuDS maintenance and management plan submitted along with the FRA.
- There are access and egress issues with the 1% AEP, 0.1% AEP surface water event and the design surface water event (1% AEP plus 40% CC). Safe access and egress will need to be demonstrated in the 1% AEP fluvial and surface water events including an appropriate allowance for climate change.
- If flood mitigation measures are implemented, then they are tested to ensure that they will not displace water elsewhere (for example, if land is raised to permit development on one area, compensatory flood storage will be required in another).

Having considered the advice contained within the SFRA, the following development guidelines are proposed in relation to the site:

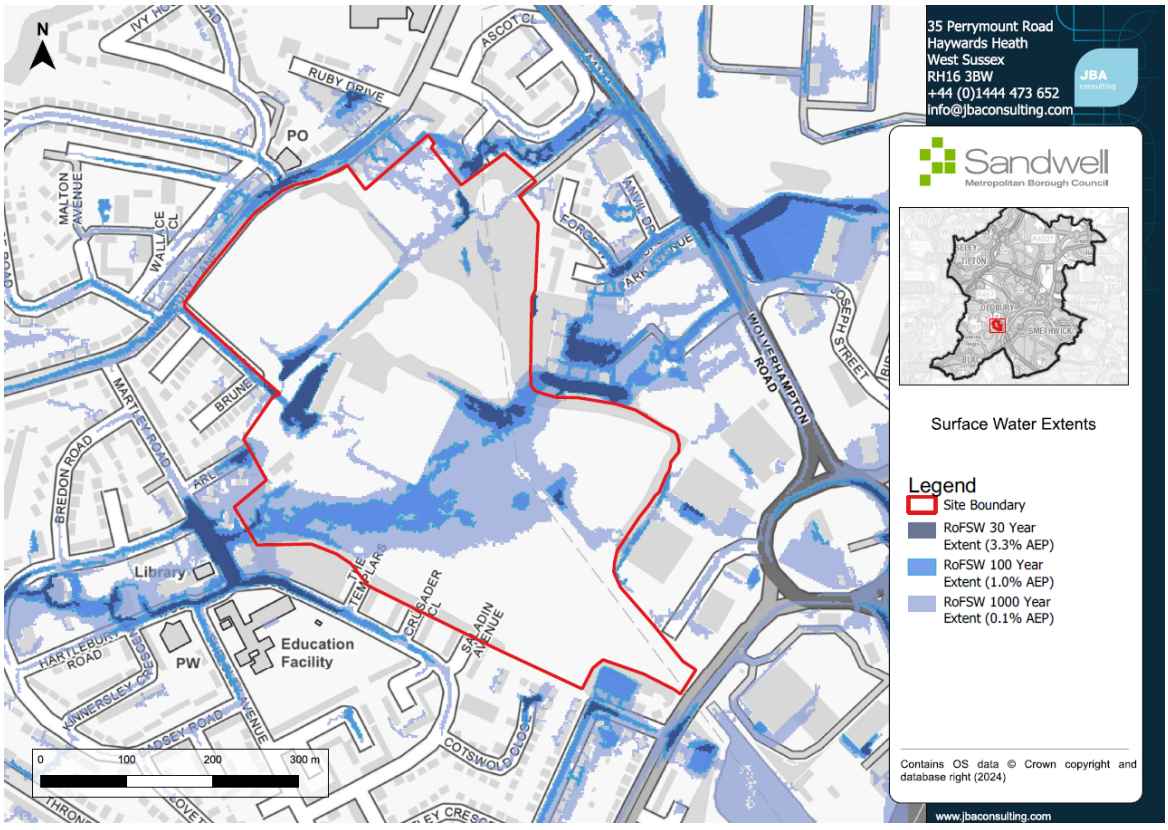
- Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime.
- The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding.

Conclusion

The site has been demonstrated to pass the Exception Test for allocation for employment use as it offers wider sustainability benefits and is capable of being made safe for its lifetime. This conclusion has been informed by engagement with the LLFA. Further consultation with the LLFA will be undertaken as proposals develop.



Flood Map for SM2: Lion Farm Estate



Surface Water Extents Map for SM2: Lion Farm Estate