



drainage systems and rivers. This would reduce the pressure on these systems, and reduce the frequency of flooding.

*Question 7) Should policy TP6 require surface water runoff to be restricted to the greenfield runoff rate on all development sites?*

We feel that a policy to restrict surface water runoff to greenfield runoff rates on all development sites is necessary to contribute towards a reduction in flood risk. We have been in discussions with Birmingham City Council and have come to an agreement on revised policy wording to address this issue. This shall replace the existing requirements for greenfield and brownfield sites specified within TP6:

*'For all sites requiring a site-specific FRA, surface water discharge rates shall be limited to the equivalent site-specific greenfield runoff rate for all return periods up to the 100 year-plus climate change event, unless it can be demonstrated that the cost of achieving this would make the proposed development unviable.'*

The requirement for this to apply only on sites requiring a FRA is because it may be difficult to enforce the policy or attenuate to such low rates on smaller sites e.g. domestic extensions. Reference to the 100 year plus climate change event is to ensure that developers attenuate in the critical storm event, and not only in smaller and more frequent storms.

*Question 8) Are the requirements of policy TP6 for setting back from watercourses sufficient?*

We welcome the inclusion of MOD74 which requires a development easement from rivers and streams which did not previously form part of the policy. We are h, rth,ei (rt) 0 (h) -0.2..

We do not consider that the current title of this policy 'Managing Flood Risk' correctly summarises its breadth of content. This policy not only includes policies on fluvial flood risk, surface water risk, and SuDS, it also tackles diffuse water pollution, Water Framework Directive, water-based habitat and groundwater. Should our written statement in relation to Matter C result in a change to this policy, it would also include foul drainage infrastructure.

In light of this we recommend the policy is renamed 'The Water Environment'.

Yours faithfully

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3