

Tabulated Warwickshire County Council Flood Risk Management Comments on the Cubbington Neighbourhood Development Plan to 2031

WCC FRM has the following content related comments:

Page	Paragraph No.	Commencing:	Comment
23	5.1	<i>CNDP Objective 1 – To protect and enhance green spaces.</i>	We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces
30	5.11	<i>Policy CNDP3 – Sustainable Design and Construction</i> <i>Point O</i>	<p>The policy states that all new developments uses existing watercourses and ditches, surface, sustainable drainage systems (SUDS) to hold rainwater in storms. SuDS should be planted with native vegetation to support wildlife. All paving should be semi-permeable to allow run-off to drain away.</p> <p>If a site is over 1ha or for 10 or more dwellings, it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment and Surface Water Drainage Strategy must be submitted to the Lead Local Flood Authority for review.</p> <p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites, as supported by the Sustainable drainage systems chapter in the Planning Practise Guidance (PPG). A link has been detailed below:</p> <p>https://www.gov.uk/guidance/flood-risk-and-coastal-change#sustainable-drainage-system</p> <p>You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length.</p>
30	5.11	<i>Policy CNDP3 – Sustainable Design and Construction</i> <i>Point R</i>	The document mentions new developments having appropriate car parking. Whilst wording has been amended and now states surfaces should be permeable, further consideration may be given to the LLFA's previous comments. Depending on the size and type of drainage, there is an opportunity to introduce SuDS and adequate treatment for flows, to ensure that discharge/run off flows leaving the car park site do not degrade the quality of accepting water bodies, providing greater amenity.

Page	Paragraph No.	Commencing:	Comment
63	N/A	<i>Appendix 5</i>	<p>We note that this policy lacks specific reference to surface water flood risk and development drainage apart from Appendix 5. We strongly recommend consideration of the below points:</p> <p>You could develop this point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable.</p> <p>In this section it would be good to mention that all above ground attenuation features should be designed to be multifunctional and consider the four pillars of SuDS which are water quality, water quantity, amenity and biodiversity.</p> <p>A comment could be included to say all developments will be expected to include sustainable drainage systems and that new developments need to consider their flood risk when building on Greenfield and brownfield sites, as supported by the Sustainable drainage systems chapter in the Planning Practise Guidance (PPG). A link has been detailed below:</p> <p>https://www.gov.uk/guidance/flood-risk-and-coastal-change#sustainable-drainage-systems</p> <p>You have included references to the NPPF and Core Strategy Policies. WCC FRM have their own Local Guidance for Developers which may be worth including in the reference documents. A link has been detailed below:</p> <p>https://api.warwickshire.gov.uk/documents/WCCC-1039-95</p>
66	N/A	QV S3.1	<p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p>