

Tabulated Warwickshire County Council Flood Risk Management Comments on the Leek Wootton and Guys Cliffe Neighbourhood Development Plan

WCC FRM has the following content related comments:

Page	Paragraph No.	Commencing:	Comment
23		<i>Objective 5</i>	Transport, Traffic and Infrastructure – the objective is related to proposed new developments, therefore a specific bullet point could be added in relation to drainage and flooding.
24	6.0.2	<i>'Neighbourhood Plans are required'</i>	Good awareness and implementation of key planning policies, as well as following the current (and emerging) Warwick District Local Plan.
33 45	6.1.13 Policy LW4	<i>'Multi-functional green infrastructure'</i>	We like this section on flood risk, especially the mentioned benefits of green infrastructure to both flood mitigation and the local environment, as well as Policy LW4 - <i>'6. Proposals should incorporate sustainable drainage techniques (SUDS) and include the use of grey water recycling where possible.'</i>
64	Policy LW8		There is no overall statement on the use of SUDs and attenuation to greenfield runoff rates. This policy covers smaller infill sites that the FRM team at WCC are not statutory consultee for so should give sufficient detail to ensure that this is done. We would suggest that this policy states that new developments should restrict surface water discharges to greenfield rates. Additionally, it should state that a mention to greenfield rates and that restricting flows to less than 5 l/s is viable so should not be considered a minimum discharge rate., and would be really useful for developers.
67	6.4.7 & 6.4.9		In relation to the re-laying of the car park, or creating any new car parks with future developments, you could specify the use of permeable surfacing or reinforced grass, emphasising the importance of using SUDs and reducing additional surface water runoff.
76	6.5.18 6.5.20	<i>'Sewerage and Drainage Infrastructure'</i>	Referring to the SUDS discharge hierarchy would be of benefit, with the preferred choice of infiltration or water discharged into an existing watercourse being the first options, before connecting to a sewer. Any new developments should be designed and built with separate systems up to the point of where they connect to the combined sewer, in line with building regulations. There is sufficient coverage of public sewers, but not enough on SUDS. We would suggest an entire paragraph specifically for the need for new developments to incorporate SUDS into plans. Details in regards to attenuation to greenfield on all sites would be good, as well as the minimum discharge rate of 5l/s being clearly stated. Consider the different types of flooding, not just fluvial from main rivers, it is important to look at surface water

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		flooding as well.
76	6.5.20	<p>This section focuses too heavily on the use of public sewers without highlighting the need to utilise SuDS.</p> <p>We would suggest as a minimum that you add a paragraph specifically for the need for new developments to incorporate SUDS into plans. This paragraph should detail your preferences in relation to the type of SuDS used.</p> <p>Our preference would be for an additional policy detailing a requirement for all new developments to utilise SuDS to achieve the multi-functional benefits of good SuDS design. This policy should include a requirement for all sites to attenuate to greenfield rates and include that 5 l/s is NOT the minimum possible discharge rate achievable.</p> <p>Consider the different types of flooding, not just fluvial from main rivers, it is important to look at surface water flooding as well.</p>