

Tabulated Warwickshire County Council Flood Risk Management Comments on the Budbrooke Neighbourhood Development Plan

WCC FRM has the following content related comments:

As a general comment, this is a clear and coherent document and those involved in its development should be congratulated. I trust our few comments are seen in this context.

Page	Paragraph No.	Commencing:	Comment
22	4. Vision and Objectives for Budbrooke		<p>There is no mention to any type of flood risk, be that fluvial (river) or pluvial (surface water). Having checked the EA surface water map, there is a range of low-high risk spots in parts of Budbrooke and Hampton Magna; we would suggest that you look into this further for your own information.</p> <p>Any risk of flooding needs to be mentioned in relation to future development; this could be included in a point in the objectives under – ‘Design, Natural and Built Environment’.</p>
30	5.2 Housing		<p>As previously mentioned, there is limited information on the use of SUDs, however the plan could include greater detail on what type of SuDs features the community would prefer and find most beneficial. We would suggest mentioning the multiple benefits of SuDs, including greater biodiversity and amenity value.</p> <p>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.</p> <p>There is no specific detail referring to greenfield Qbar rates, and we would suggest that restricting flows to less than 5 l/s is viable.</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. 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>
37	Policy BNDP7 Design of Development in	(I)Uses Sustainable Drainage Systems	<p>There is a lack of information or details on the preferred SuDs features that the parish would like to see in future developments. With further research, suggestions could then be made for developers when they read the neighbourhood plan.</p>

Page	Paragraph		Comment
	Budbrooke Parish.		A point that mentions the consideration to design standards in accordance with the SuDS manual and their maintenance is highly advised.
39	Policy BNDP9 Protecting and enhancing local landscape character		This policy could include a principle that encourages new developments to open up any existing culverts on a site, and the creation of new culverts should be kept to a minimum.
45	Appendix 1 – Relevant Planning Policies	10. Meeting the challenge of climate change, flooding and coastal change	The NPPF suggests a neighbourhood plan should consider the issues from climate change and flooding, neither of which is not mentioned within the document. See previous comments.
46-48	Warwick Local Plan (2011-2029)	Flooding and Water Policy, FW1 Reducing Flood Risk Policy, FW2 Sustainable Drainage Policy, FW3 Water Efficiency Policy, FW4 Water Supply	Similar as before, the document doesn't mention flooding in line with the Warwick local Plan; this can be resolved with our comments from this consultation.