Your ref: PAP/2021/0663
Our ref: WCC002350/FRM/CSB/001
Your letter received: 10/12/2021

Flood Risk Management
Warwickshire County Council
Shire Hall
Warwick
Warwickshire

Mr J Brown
Head of Planning
North Warwickshire Borough Council
The Council House
South Street
Atherstone CV9 1DE

FAO Andrew Collinson

11 January 2022

Dear Mr Brown

PROPOSAL: **Outline planning permission for development of land within Use Class B2 (general industry), Use Class B8 (storage and distribution) and Use Class E(g)(iii) (light industrial), and ancillary infrastructure and associated works, development of overnight lorry parking facility and ancillary infrastructure and associated works. Details of access submitted for approval in full, all other matters reserved**

LOCATION: **Land On The West Side Of, Dordon Road, Polesworth**

Warwickshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the application which was received on the 10 December 2021. Based on the information submitted the LLFA currently recommends refusal of planning permission and **objects** to the development based on the following reasons.

Reason
The information submitted with this application does not comply with the requirements set out in the National Planning Policy Framework (NPPF) and paragraphs 079-086 of the Planning Practice Guidance (PPG). The submitted information does not, therefore, provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development.

In particular the following information was not submitted with the application and forms the basis of our objection. It should be noted that this is in line with prior advice provided in pre-application advice (ref: PRE000033) and in WCC LLFA's response to the EIA Scoping Opinion, dated 7th December 2020.

- The FRA states the development will be attenuated the Qbar greenfield rate, supporting calculations are required.

- Further information is required regarding the outfall from the site. Whilst it is noted information has been provided through the pre-application advice process with the LLFA, this information should be provided within the planning application to ensure a holistic review of the information available.

- A preliminary surface water drainage strategy is required showing where SuDS features will be located and demonstrating sufficient space is accorded within the parameter plans to be approved.

- Supporting calculations demonstrating that the various attenuation features are suitably sized to accommodate the 1 in 100 year storm event including an allowance for climate change.

- It's stated within the FRA that the design life of the development is 30 years and an allowance of +20% has been used. This design life could be considered low and as such the LLFA would wish to see the surface water drainage strategy sensitivity tested using a +40% climate change allowance to understand the risks to this and wider development.

- Further consideration in relation to the culverted watercourse passing through the site. Opportunities to daylight this feature should be considered early and space made available within the masterplan.

- Assess the likely water quality hazard arising from the development and identify appropriate mitigation

- Consider and demonstrate how any surface water exceedance and overland flow will be managed and routed through the development.

Overcoming our objection

You can overcome our objection by submitting further information which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application.

We ask to be re-consulted with the results of any additional information. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Informative

1. The LLFA does not consider oversized pipes or box culverts as sustainable drainage. Should infiltration not be feasible at the site, alternative sustainable drainage should be used, with a preference for above ground solutions.

2. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. Sustainable Drainage Systems (SuDS) are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on-site as opposed to traditional drainage approaches which involve piping water off-site as quickly as possible.

3. SuDS involve a range of techniques including methods appropriate to impermeable sites that hold water in storage areas e.g. ponds, basins, green roofs etc. rather than just the use of infiltration techniques. Support for the SuDS approach is set out in NPPF.

Yours sincerely

HS2 Senior Flood Risk Management Engineer