

Response to Objection to Outline planning permission for Extension of MIRA Technology Park

Technical Note

Date: 01/03/2023

Client Name: ERI MTP Limited

Document Reference: EED13833-118-TN-6-1-1

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Prepared by	Checked & Approved by
	Ameena Syed Principal Engineer	Harry Chetty Technical Director

Introduction

- 1.1. Waterman was commissioned by ERI MTP Limited to address objections raised to an outline planning application for the Extension of MIRA Technology Park to comprise employment use (Class B2); associated office and service uses (Class Eg); storage (Class B8); new spine road; car parking, landscaping and enabling works - all matters reserved. The Site is located to the south of Watling Street, Caldecote, CV10 0TS.
- 1.2. The objection from Warwickshire County Council LLFA is included in Appendix A and the further information required to overcome the objection, as outlined by LLFA, is summarised below:

The previously submitted technical note (EED13833-118-TN-3-1-3) stated in paragraph 1.16 that two of the previously proposed ponds would not provide the full 8m easement from the watercourse on site, and therefore the drainage strategy would be revised to provide swales instead. The technical note recently submitted (EED13833-118-TN-5-1-2) does not reflect these changes and the drainage strategy remains unchanged. The LLFA therefore maintains their request for further details of a revised drainage strategy that honours the 8m easement and performs effectively. The LLFA requests:

 - a. A revised Indicative Surface Water Drainage Strategy that reflects the above changes to illustrate the nature and layout of the proposed drainage features.
 - b. Calculations to demonstrate that there is adequate attenuation to limit the site's discharge to the appropriate greenfield run off rate of 4.32l/s/ha.

Proposed Surface Water Drainage Strategy

- 1.1. The purpose of this technical note is to provide clarification that the revised drainage strategy honours the 8m easement and performs effectively.
- 1.2. Paragraph 1.16 of EED13833-118-TN-3-1-3 states that:

There are two ponds on the previously submitted drainage strategy (EED13833-118-R-2-4-3-FRA) that do not provide the full 8m easement. These are currently being redesigned as part of the next stage of the design and the ponds will be removed and replaced with a swale. The 8m easement will be considered and included within the updated drainage strategy and supporting drawings.
- 1.3. As part of the revised drainage strategy EED13833-118-TN-5-1-2, the two ponds were realigned to fall outside the 8m buffer zone (easement) instead of replacing them as swales. The reason for doing this is that the buffer required for the two ponds was not far off from the requirement of 8m easement. Swales shall be investigated as a proposal as part of the detailed scheme design if still required. As part of outline planning application, the drainage strategy demonstrates there is sufficient space allowed for storage by retaining pond solution as such without needing them to replace with swales.
- 1.4. Figure 1 below highlights the two ponds in red box that were realigned outside of the 8m easement. This is an extract of the Drawing Number 13833-WIE-ZZ-XX-DR-92004 Revision P05 from the Appendix B of EED13833-118-TN-5-1-2 submitted in support of the drainage strategy.

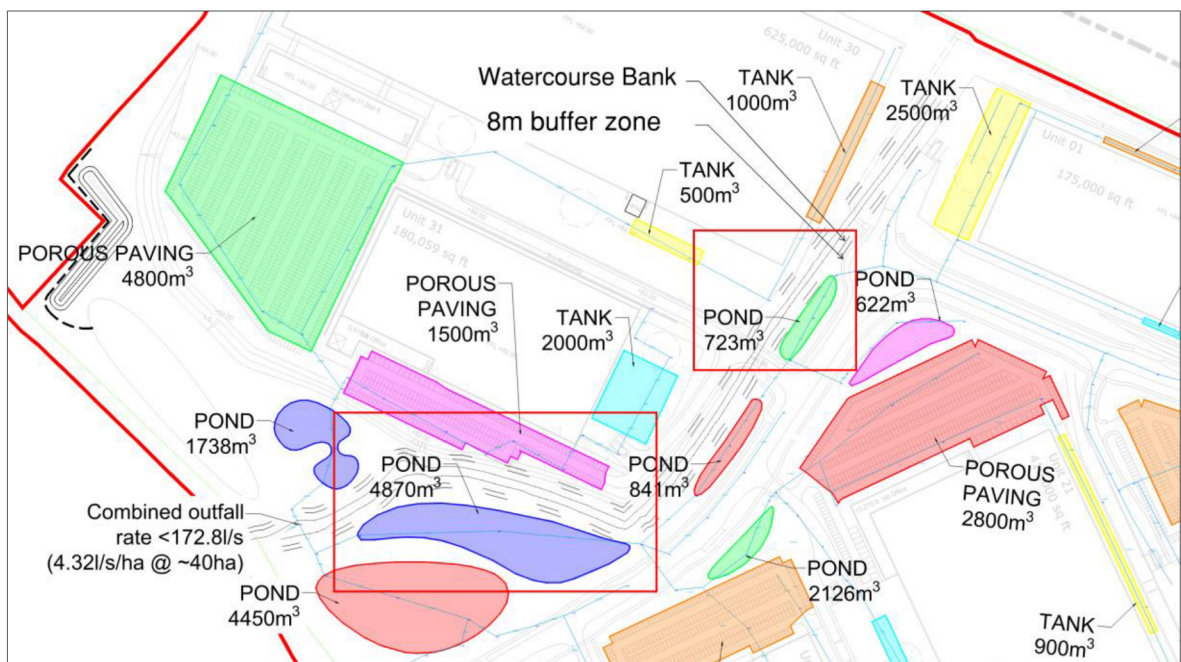


Figure 1 Extract of the Drawing Number 13833-WIE-ZZ-XX-DR-92004 Revision P05

- 1.5. Based on the above, it is understood that the revised Indicative Surface Water Drainage Strategy and the calculations submitted as part of the technical note EED13833-118-TN-5-1-2 reflects all the changes and is sufficient to overcome the objection.

APPENDIX A

Your ref: PAP/2022/0423
Our ref: WCC002597 R2/FRM/GF/001
Your letter received: 19/01/2023



SENT BY EMAIL

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FAO Jeff Brown

03 February 2023

Dear Mr Brown

PROPOSAL: Outline planning permission for Extension of MIRA Technology Park to comprise employment use (Class B2); associated office and service uses (Class Eg); storage (Class B8); new spine road; car parking, landscaping and enabling works - All matters reserved

LOCATION: Land to the south of, Watling Street, Caldecote, CV10 0TS

Warwickshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the additional information for this application which was received on the 19 January 2023. It is understood this is in response to the LLFA's prior response on 16 December 2022 where the following was considered outstanding.

1. Given the proposals to revise the drainage strategy so that an adequate buffer alongside the on site watercourse can be provided and limit the site discharge rate to 4.32l/s/ha, the LLFA requires evidence to illustrate that it is possible to provide a viable drainage scheme that meets these criteria. Supporting evidence should include:
 - a. A revised Indicative Surface Water Drainage Strategy to illustrate the nature and layout of the proposed drainage features.
 - b. Calculations to demonstrate that there is adequate attenuation to limit the site's discharge to the appropriate greenfield run off rate.

The LLFA acknowledges the additional information submitted in support of the proposed drainage strategy. However the submitted drainage strategy does not reflect the changes that were previously proposed in EED13833-118-TN-3-1-3 paragraph 1.16 to provide an 8m buffer from the watercourse on site. The LLFA therefore requires further information to demonstrate that this can be achieved.

Based on the information submitted the LLFA currently **maintains our objection** to the development based on the following reasons.



*Working for
Warwickshire*

Reason

The information submitted with this application does not comply with the requirements set out in the National Planning Policy Frameworkⁱ (NPPF) and supporting Flood Risk & Coastal Change guidanceⁱⁱ. Specifically:

- The details relating to the surface water drainage are insufficient.

The submitted information does not therefore allow a suitable assessment of the proposed development, considering flood risk and surface water drainage matters.

Overcoming our objection

You can overcome our objection by submitting further information which is detailed below. This information should provide details of the proposed surface water drainage considering the scale and nature of the development to ensure the site 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.

At the 'outline' planning stage a the Surface Water Drainage Strategy should be developed to inform the masterplan or indicative site layout. This should be based on SuDS principles and provide opportunity to attenuate surface water runoff, improve water quality and provide amenity and biodiversity. This should be supported by suitable high-level calculations demonstrating the performance of the attenuation and that adequate space is provided.

Given the above, the following comments are made and further information required is outlined. This forms the basis of our current objection:

1. The previously submitted technical note (EED13833-118-TN-3-1-3) stated in paragraph 1.16 that two of the previously proposed ponds would not provide the full 8m easement from the watercourse on site, and therefore the drainage strategy would be revised to provide swales instead. The technical note recently submitted (EED13833-118-TN-5-1-2) does not reflect these changes and the drainage strategy remains unchanged. The LLFA therefore maintains their request for further details of a revised drainage strategy that honours the 8m easement and performs effectively. The LLFA requests:
 - a. A revised Indicative Surface Water Drainage Strategy that reflects the above changes to illustrate the nature and layout of the proposed drainage features.
 - b. Calculations to demonstrate that there is adequate attenuation to limit the site's discharge to the appropriate greenfield run off rate of 4.32l/s/ha.

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..

Informative

- a) 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.
- b) The LLFA does not consider oversized pipes or box culverts as sustainable drainage. Where such attenuation is considered necessary, this should be supplemented with suitable above ground features such as green roofs, rain-gardens and tree pits to provide water quality, amenity and biodiversity benefits.
- c) Reference is made to the LLFA's *Flood Risk & Sustainable Drainage Local guidance for developers*ⁱⁱⁱ which provides further advice and guidance as to how surface water drainage proposals should be designed.

Yours sincerely



Georgina Flower
Flood Risk Management Engineer

Documents Reviewed:

- Response to Objection to Outline planning permission for Extension of MIRA Technology Park_ Land to the south of, Watling Street, Caldecote, CV10 0TS_ EED13833-118-TN-5-1-2

N.B. On 10th January 2023, the Defra published^{iv} “the Review for implementation of Schedule 3 to the Flood & Water Management Act 2010;” this recommended implementation of Schedule 3 and the government has accepted this recommendation. Under Schedule 3, Warwickshire County Council will take on the role of the SuDS Approval Body (SAB), responsible for approval of sustainable drainage systems (SuDS) then adopting and maintaining features following construction.

It is expected that Schedule 3 will drive a step-change in the design of holistic SuDS systems. SuDS should meet all four pillars of water quantity, water quality, amenity and bio-diversity, being dispersed around a site and not concentrated into single, large attenuation features.

It is anticipated that implementation will be during 2024 with further consultations taking place through 2023 to determine statutory instruments, regulations and technical standards. Some of this is presumed to be undertaken by central government and others parts of process development will be undertaken by WCC in its role as the SAB. Warwickshire County Council Flood Risk Management team will announce more information as it becomes known.

ⁱ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

ⁱⁱ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

ⁱⁱⁱ <https://api.warwickshire.gov.uk/documents/WCCC-1039-95>

^{iv} <https://www.gov.uk/government/publications/sustainable-drainage-systems-review>