

**From:** Chris Nugent

**Sent:** 02 June 2021 17:01

**To:** Phil Plant <[phil.plant@midwestplanning.co.uk](mailto:phil.plant@midwestplanning.co.uk)>

**Subject:** RE: Wroxton Motocross application. Additional information about drainage and surface water management.

Good evening Phil,

Thank you for sending me a copy of Mr. Nathanael Stock's email comments, concerning our letter.

You might like to point out to Mr. Stock that my comments at the end of the letter were quoting the Planning Engineer from the LLFA covering the Cherwell District Council Planning area. In choosing to point out that sustainable drainage systems are required to provide water quality, biodiversity and amenity benefits in line with National Guidance, the LLFA are not themselves promoting the application. As a water regulator, Sujeenthan Jeevarangan is pointing out that these aspects are fundamental and central to SuDS practice.

Please find attached the top of p.4 of the SuDS Manual, the first two paragraphs of the document's summary and you will see that this document

***"looks at how to maximise amenity and biodiversity benefits and deliver the key objectives of managing flood risk and water quality"***.

This is not an optional add-on to SuDS, it is an element that is sufficiently central to warrant pride of place, in the very first paragraph of the summary of this 937 page document, which is itself a central reference to correct SuDS practice in the UK.

While I admit in my letter to not being qualified to comment in detail on the sociological or health benefits of providing young people with an amenity such as motocross, I do recognise it as an amenity and like Sujeenthan Jeevarangan, I recognise the role of SuDS in maximising amenity benefits. If Mr. Stock feels that our business and expertise may be important to this assessment, he only has to read the FRA. He will be able to see from Section 9, entitled "Surface water management credentials", my summary as follows:

*"This surface water management plan was written by Chris Nugent of Lidar-Logic. Chris has worked since 1981 in areas of hydrology and fluvial geomorphology, specialising in flood risk assessment and surface water management in 2007. Since then, working for Hydro-Logic Services (HLS), he has written and / or managed well over 500 assessments of flood risk across the UK, most of which included a surface water management component. Chris left HLS to form Lidar-Logic in August 2018"*

As the Team Leader of the General Developments Planning Team at Cherwell District Council, I am very sure that Nathanael Stock will be entirely impartial, representing all members of the district, young and old. I, too have represented a variety of clients, by presenting relevant details of flood risk and SuDS to responsible regulators in an appropriate manner. I do not see the dissemination of pertinent information as "promoting" but rather as "informing" those who will ultimately make the decisions.

Best wishes

Chris

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