



Technical advisers on environmental issues

**FLOOD RISK ASSESSMENT AND DRAINAGE
STRATEGY IN RESPECT OF THE GRS ROADSTONE
LIMITED AGGREGATES RAILHEAD AT NEILSON RAIL
SIDINGS, WELLINGBOROUGH**

**PLANNING APPLICATION
TO IMPORT IBAA INTO THE EXISTING
WELLINGBOUGH RAILHEAD REGULATED UNDER
PLANNING CONSENT 09/00009/MIN
DATED 7 APRIL 2009 AND BLEND THE SAME WITH
RAW AGGREGATE TO DERIVE A
SECONDARY/RECYCLED CONSTRUCTION MATERIAL**

Report reference: GRS/WE/KW/20082/01
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FIGURES

Figure 1 Site location and layout (drawing reference GRS/WE/08-23/23860)

APPENDICES

- Appendix A David L Walker Limited plan entitled "IBAA Import – Layout Plan" reference W78/PL3/03 dated July 2023
- Appendix B Information on flood risk requested from the EA comprising the Product 4 package of information
- Appendix C Anglian Water sewer plan
- Appendix D Surface runoff calculations

1. Introduction

- 1.1** MJCA is commissioned by GRS Roadstone Limited to undertake a site specific flood risk assessment (FRA) with respect to the proposed importation of Incinerator Bottom Ash Aggregates (IBAA) and blending of the IBAA with primary aggregate at Neilson Rail Sidings, Wellingborough.
- 1.2** The FRA has been carried out in support of a planning application in relation to the proposed activities. The FRA has been undertaken consistent with the National Planning Policy Framework (NPPF) (reference 1) and the associated Planning Practice Guidance (PPG) (reference 2).
- 1.3** It is understood that the application area has the benefit of an existing Planning Permission reference WP/2009/0047 dated 7 April 2009 relevant to the operation of a rail aggregates depot. The site location and layout are shown on Figure 1. The area of the current Planning Permission and additional site details are shown on the plan presented at Appendix A.
- 1.4** The application area comprises part of the Wellingborough Railhead (the railhead site) operated by GRS Roadstone Limited. The railhead site includes the existing railhead with ancillary facilities including areas of hardstanding yard space and stocking bays together with areas of open storage, miscellaneous plant and material stores together with a wheel wash, weighbridge and site offices. The railhead site comprises part of the Neilson Rail Sidings site where aggregates are imported by rail, stored and loaded for onward distribution by road. Based on historical Ordnance Survey (OS) mapping there have been railway sidings in the vicinity of the application area since at least 1899 and the extent of the area of sidings and associated activity has changed over time. The site is located in a predominately industrial area on the north eastern outskirts of Wellingborough, Northamptonshire.
- 1.5** As shown on Figure 1 the application area comprises two main parts: an area of hardstanding in the north and an existing site access road in the south. It is understood that the majority of the railhead site comprises porous hardstanding including the hardstanding area to be associated with the proposed IBAA handling activities in the north of the application area shown on Figure 1. There are ancillary

facilities such as site offices, weighbridge and car parking in the south of the application area associated with the site access road.

Proposed development

- 1.6** It is understood that it is proposed to import IBAA and subject the imported materials to a simple blending process to generate a non-waste recycled aggregate/construction material product. The proposed blending process will necessitate the construction of three bays for the IBAA storage and blending operations in the northern part of the site which comprises an area of hardstanding.
- 1.7** The IBAA blending operations will be carried out using loading shovels and the placement in the bays of alternate layers of IBAA and aggregate. Each IBAA storage and blending bay will be constructed using precast concrete Legioblocks® and each bay will be approximately 30m long, 12.5m wide and 4m high.
- 1.8** The IBAA storage and blending bays will be established on the existing hardstanding on the current railhead subject to some slight re-grading to facilitate the containment of drainage in the storage bays. The IBAA storage and blending bays will incorporate impermeable surfaces with sealed drainage systems. Surface runoff from the IBAA storage and blending bays will be collected and contained in suitable storage tanks before being removed from the site for off site disposal.
- 1.9** It is understood that no new processing plant or equipment is required and no changes to materials handling methods are required. It is understood that the existing facilities such as site offices, weighbridge and car parking in the south of the application area associated with the site access road will be unchanged. It is understood that the railhead and site management facilities already are consented and do not need developing further in support of the planning application.
- 1.10** Access to the site as regulated through the consent is to and from Meadow Close to the east of the site. However, since late 2019 the operations at the site have benefited from a new and enhanced access off Roundhouse Way to the south. This access was instated by Network Rail under their own permitted development powers to service access to their interests (including the site) at the Neilson Sidings. This

application seeks consent to continue the use of this new access both for the proposed development and the ongoing use of the site as an aggregates railhead.

2. Geological and hydrological setting

Site Setting

- 2.1** The application area is centred approximately on National Grid Reference (NGR) SP 90457 69639 and is located approximately 1.5km north east of the centre of Wellingborough and 2.3km south west of the centre of the village of Finedon. The Harrowden Brook is located approximately 30m east of the northern part of the application area at its closest point.
- 2.2** The railhead site of which the application area comprises a part includes the existing aggregate stocking and handling yard with ancillary facilities including areas of hardstanding, yard space and stocking bays together with areas of open storage, miscellaneous plant and material stores. The application area is located in a predominantly industrial area. There are areas of undeveloped land including scrub and woodland located to the east and north of the northern part of the application area.
- 2.3** The northern part of the application area has dimensions of approximately 50m by 100m which is understood to comprise porous hardstanding. The site access road and associated facilities comprise the southern part of the application area. The site access road is approximately 550m in length. The site access road and the adjacent railway cross over the Harrowden Brook approximately 180m south of the northern part of the application area and cross under the Finedon Road approximately 415m south of the northern part of the application area. The application area is accessed from the south off Roundhouse Way. As shown on the site layout plan presented at Appendix A there is an existing car park, weighbridge and a site office building in vicinity of the site entrance approximately 315m south of the northern part of the application area.
- 2.4** Based on an Environment Agency (EA) 2022 LIDAR Digital Terrain Model (DTM) the northern part of the application area and the wider hardstanding area of which it comprises a part is at an elevation of between approximately 49.5m above Ordnance Datum (mAOD) and 50.5mAOD. At the edge of the hardstanding area approximately 15m east of the northern part of the application area the ground falls away steeply to

the east towards Harrowden Brook which is at an elevation of approximately 43mAOD to 44mAOD. On the east bank of the Harrowden Brook ground levels are between approximately 45mAOD and 46mAOD.

Geology

- 2.5** Based on British Geological Survey (BGS) web map service (WMS) 1:50,000 scale geological mapping the bedrock underlying the application area comprises mudstone of the Whitby Mudstone Formation which comprises part of the Jurassic Lias Group.
- 2.6** The application area is recorded by the BGS as being underlain by artificial ground comprising undivided Made Ground. The Made Ground extends eastwards to Harrowden Brook and westwards to the railway line located approximately 100m west of the northern part of the application area.
- 2.7** Based on the BGS mapping there are no superficial deposits recorded at the site. Quaternary Alluvium comprising clay and silt is recorded to the east of Harrowden Brook.

Hydrogeology

- 2.8** The Whitby Mudstone Formation bedrock underlying the site is classified as an unproductive aquifer. The Alluvium is classified as a Secondary A aquifer. Secondary A aquifers comprise permeable layers that can support local water supplies and may form a component of baseflow. There are no groundwater Source Protection Zones (SPZs) located in vicinity of the site.

Hydrology

- 2.9** The Harrowden Brook is a west bank tributary of the River Ise. The confluence of Harrowden Brook and the River Ise is located approximately 150m north east of the northern part of the application area. The River Ise is located east of the application area and flows generally north to south. The River Ise has a confluence with the River Nene approximately 2km south of the site.
- 2.10** Based on OS mapping it is considered that the Harrowden Brook runs in a culvert under the railway and site access road approximately 180m south of the northern part

of the application area. There is an additional crossing of Harrowden Brook approximately 85m north east of the northern part of the application area. It is understood that the additional crossing is associated with an alternative site access route to the railhead which is located off Meadow Close on the eastern bank of Harrowden Brook.

- 2.11** Based on the Environmental Agency Flood Map for Planning the application area generally is located in Flood Zone 1 with the exception of an approximately 15m wide strip in the east of the northern part of the application area which is located in Flood Zone 2. Based on the Flood Map part of the existing site access road in the vicinity of the crossing of Harrowden Brook is also located in Flood Zone 2. Based on the Flood Map a small area of ground immediately adjacent to Harrowden Brook (but outwith the application site) is located in Flood Zone 3. Flood Zone 1 is defined in the PPG to the NPPF (reference 2) as land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1%). Flood Zone 2 is defined as land assessed as having between a 1 and 1000 and a 1 in 100 annual probability of river or sea flooding (between 0.1% and 1%). Flood Zone 3 is defined as land assessed as having greater a 1 and 100 annual probability of river or sea flooding (>1%).
- 2.12** The location of the flood zones at and in the vicinity of the site are shown at Appendix B which comprises flood risk information requested from the EA. The information presented at Appendix B is described in detail in Section 4 of this report.

3. Strategic flood risk assessment

- 3.1** A Level 1 Strategic Flood Risk Assessment (SFRA) was produced in February 2011 by Royal Haskoning for the Borough Council of Wellingborough (BCW) and Kettering Borough Council (KBC). BCW commissioned Northamptonshire County Council (NCC) in September 2016 to prepare an updated Level 1 SFRA (reference 3) (the 2017 SFRA Update).
- 3.2** Based on the 2017 SFRA Update the section of Harrowden Brook in the vicinity of the site has been modelled using 1D hydrodynamic (ISIS) hydraulic models and it is reported that the EA should be contacted for further details of the modelling carried out. Flood risk information requested from the EA to facilitate preparation of this FRA is presented at Appendix B.
- 3.3** The 2017 SFRA Update includes flood maps which record that there are areas with a high risk of fluvial flooding (Flood Zone 3a) located on Harrowden Brook upstream of the application area to the west of the crossing of the railway over Harrowden Brook in the vicinity of the site access road. The application area and the reach of Harrowden Brook downstream of the railway crossing over the Harrowden Brook and upstream of its confluence with the River Ise is not recorded as being located in Flood Zone 3a. There are substantial areas shown in Flood Zone 3a on the east bank of the River Ise.
- 3.4** Based on 2017 SFRA Update the application area is not recorded in Flood Zone 3b (the Functional Floodplain) which comprises land where water has to flow or be stored in times of flood. There are substantial areas of Functional Floodplain on the east bank of the River Ise.
- 3.5** Based on the surface water flooding maps in the 2017 SFRA Update there is part of Neilson Rail Sidings west of the northern part of the application area which may have a medium to high risk of surface water flooding. A high risk area is defined as an area with greater than or equal to a 1 in 30 chance in any given year of surface water flooding. An area of medium risk is defined as having less than a 1 in 30 but greater than a 1 in 100 chance in any given year of surface water flooding.

- 3.6** Based on the 2017 SFRA Update the application area is assessed as having a negligible risk of groundwater flooding and reservoir flooding.
- 3.7** Detailed information is not provided in the 2017 SFRA Update on the risk of sewer flooding. It is stated that sewers are typically designed to cater for a storm period from 1 in 50 annual probability (2%) up to the 1 in 30 annual probability (3.33%) storm event.

4. Assessment of the risk of flooding at the site

- 4.1** Detailed flood risk mapping information obtained from the EA is presented at Appendix B. The information requested from the EA comprises the Product 4 package of information. Product 4 comprises a Detailed Flood Risk Assessment Map, including flood zones, defences and storage areas, areas benefiting from defences, statutory main river designations, historic flood event outlines and more detailed information from EA computer river models (including model extent, information on one or more specific points, flood levels, flood flows).
- 4.2** Based on the Historic Flood Map presented at Appendix B Harrowden Brook in the vicinity of the site flooded in March 1947. In the 2017 SFRA Update it is reported that in March 1947 a combination of heavy rain on a frozen catchment followed by rapid snowmelt resulted in substantial flooding on the River Nene between Northampton and Wellingborough and flooding on Harrowden Brook.
- 4.3** The western boundary of the March 1947 flood event shown on the Historic Flood Map coincides with the western boundary of Flood Zone 2 on the Flood Map for Planning. On this basis there is part of the east of the northern part of the application area and part of the site access road shown as being within the March 1947 flood extent.
- 4.4** The information presented at Appendix B includes information derived from EA hydraulic river models. Modelled flood levels for storm events with a range of return periods are provided for three modelled node points each on Harrowden Brook and a further three node points on the River Ise. The predicted flood levels for the modelled node points on the River Ise are lower than for the modelled flood nodes on the Harrowden Brook adjacent to the site hence are not considered in detail here.
- 4.5** A map provided at Appendix B shows modelled flood extents for Harrowden Brook. It would appear that the modelled flood extents are applicable to the modelled node points upstream of the application area (node points Ha661 and Ha448). This area is upstream of the culverted section of Harrowden Brook under the railway line and site access road.

- 4.6** Flood extents do not seem to have been provided for modelled flood node Ha59U located on Harrowden Brook in the vicinity of the site. As shown on Figure 1 node Ha59U is located at the additional crossing point over Harrowden Brook located north east of the northern part of the application area. For modelled flood note Ha59U the modelled 1 in 100 year plus 20% climate change flood level and the modelled 1 in 1000 year plus 20% climate change flood levels are 44.97mAOD and 45.51mAOD respectively. For comparison the northern part of the application area is at an elevation of between approximately 49.5mAOD and 50.5mAOD based on the EA 2022 LIDAR DTM. For illustrative purposes the areas upstream of node Ha59U which are at an elevation lower than the 1 in 100 year and 1 in 1000 year modelled flood levels are shown on Figure 1. Consistent with Figure 1 the whole application area is significantly higher in elevation than either the 1 in 100 year or the 1 in 1000 year modelled flood levels for node Ha59U.
- 4.7** As the western boundary of the March 1947 flood event coincides with the western boundary of Flood Zone 2 shown on the EA Flood Map for Planning it is considered that the extent of Flood Zone 2 is designated on the Flood Map local to the application area based on the March 1947 flood outline rather than the EA flood modelling described above. As the BGS geological mapping records artificial ground comprising Made Ground at the site it is considered that in the course of the historical use of the site as rail sidings ground levels are likely to have increased significantly compared with the ground levels prior to the development of the rail sidings. Whilst it may be conservative to assume that the 1947 flood outline comprises the western extent of Flood Zone 2 it is considered that this approach does not take into account that ground levels are likely to have changed significantly in the more than 76 years since the 1947 historic flood event and on this basis may be unrealistic. It is considered that the flood modelling results and current ground elevations comprise a more realistic basis for assessing the risk of fluvial flooding than the 1947 historical flood extent.
- 4.8** For the western part of the site to be located in the floodplain would necessitate a flood level of approximately 49.5mAOD or approximately 4m higher than the modelled 1 in 1000 year plus 20% climate change flood level of 45.51mAOD for

modelled flood node Ha59U. A flood level of 49.5mAOD would cause inundation of a substantially greater area of land than the extent of the 1947 historic flood event.

- 4.9** Based on the information reviewed it is considered that the northern part of the application area generally is not located in the fluvial floodplain and lies approximately 4m higher than the predicted flood levels for the 1 in 1000 year plus 20% climate change fluvial flood event. Consistent with Figure 1 it is considered that neither the northern part of the application area or the site access road are located in the floodplain. On this basis it is considered that the risk of fluvial flooding to the application area is negligible.
- 4.10** Detailed information is not provided in the 2017 SFRA Update on the risk of sewer flooding. A plan showing sewers at and in the vicinity of the application area is presented at Appendix C. A 300mm diameter foul sewer crosses the site access road south of Harrowden Brook. Based on the information presented at Appendix C there are no other sewers located in proximity to the application area and it is considered that the risk of sewer flooding generally is low.
- 4.11** Consistent with the 2017 SFRA Update it is considered that there are no significant risks to the application area associated with surface water flooding, reservoir flooding or groundwater flooding.

5. Flood risk Sequential Test

- 5.1** The NPPF (reference 1) sets out planning policy for England. The NPPF includes national policy for development and flood risk which must be taken into account in the preparation of local plans and is a material consideration in planning decisions. It is stated in the NPPF that strategic policies should be informed by a strategic flood risk assessment (SFRA) and that a sequential, risk-based approach should be applied to the location of development taking into account the current and future impacts of climate change.
- 5.2** Based on the allocated housing sites and sustainable urban development extensions maps in the 2017 SFRA Update the application area is in an area which is allocated as suitable for Sustainable Urban Extension. It is reported in the 2017 SFRA Update that the site specific allocation process including the Sequential Test has been informed by the available evidence base on flood and water management.
- 5.3** Notwithstanding that the application area comprises part of an area which it is understood is allocated for Sustainable Urban Extension, for the purpose of preparing the FRA a sequential, risk-based approach has been followed to assess the proposed development consistent with the NPPF, the 'flood risk and coastal change' section of the PPG and EA guidance on Flood Risk Assessment (FRA). Other sources of information on flood risk including the 2017 SFRA Update have also been reviewed.
- 5.4** The NPPF sets out the basis for the flood risk Sequential Test, the aim of which is to steer new development to areas with the lowest risk of flooding. Consistent with the NPPF, development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. An Exception Test is defined in the NPPF with reference to the potential vulnerability of the site to flooding and the nature of the development proposed for application in circumstances where it is not possible for development to be located in zones with a lower risk of flooding. It is stated that for the Exception Test to be passed it should be demonstrated that:

“...a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall...

- 5.5** Based on the NPPF the acceptability or otherwise of a development in an area at risk of flooding should be assessed on a site specific basis taking into account the Sequential Test and the Exception Test where applicable and whether (among other criteria) the most vulnerable development within the site is located in areas of lowest flood risk, the development is appropriately flood resistant and resilient, incorporates sustainable drainage systems, and whether any residual flood risk can be managed safely. Based on the NPPF, developments which increase flood risk elsewhere should not be permitted.
- 5.6** The NPPF is supported by the PPG which provides guidance on how relevant policy in the NPPF should be implemented. The PPG defines flood risk zones (Flood Zones) and sets out a vulnerability classification for different types of proposed development in relation to flood risk. It is stated in the NPPF (reference 1) that:
- “The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.”*
- 5.7** The Flood Zones refer to the probability of river and sea flooding ignoring the presence of defences and do not take into account the potential future impacts of climate change.
- 5.8** Based on the EA Flood Map for Planning the majority of the site is located in Flood Zone 1 and part of the east of the site is located in Flood Zone 2. Based on the review of the detailed flood modelling information presented at Appendix B and described in Section 4 it is considered that the application area is not located in the fluvial floodplain and that on this basis all of the application area is located in Flood Zone 1.
- 5.9** Flood risk vulnerability classifications are presented at Annex 3 to the NPPF (reference 2). The proposed development comprises an IBAA storage and

processing facility. “Waste treatment (except landfill and hazardous waste facilities)” and “mineral working and processing (except sand and gravel)” land uses are assigned a “less vulnerable” vulnerability classification and on this basis it is considered that the application area comprises a “less vulnerable” development.

- 5.10** Based on Table 2 of the PPG to the NPPF a development use classified as less vulnerable is an appropriate land use in all flood zones except Flood Zone 3b and it is not necessary to undertake the Exception Test for such development. On this basis it is considered that the proposed development is consistent with the requirements of the flood risk Sequential Test hence is located appropriately with respect to minimising flood risk.

6. Assessment of the potential for flooding in the future at the proposed development

6.1 As explained in Section 2 it is understood that the existing facilities such as site offices, the weighbridge and car parking in the south of the application area associated with the site access road will be unchanged under the development proposals. It is understood that the railhead and site management facilities already are consented and do not need developing further in support of this planning application. On this basis the only aspects of the proposed development which will change from the existing situation relate to the northern part of the application area in which the three bays for the IBAA storage and blending operations will be constructed.

6.2 As explained in Section 4 the approximate extent in the vicinity of the application area of ground with an elevation lower than the 1 in 1000 year plus climate change modelled flood level for flood node Ha59U on the Harrowden Brook is shown on Figure 1. Consistent with Figure 1, it is considered that both the northern and southern parts of the application area are at elevations which are significantly higher than the 1 in 1000 year plus climate change modelled flood level and on this basis no parts of the application area are located in the fluvial floodplain. As the northern part of the application area is not located in the floodplain the construction of the three IBAA storage and blending bays will have no effect on fluvial flood flows or levels or on storage of flood water in the floodplain.

6.3 With regard to access and egress during flood events it is considered that as the southern part of the application area is at an elevation higher than the 1 in 1000 year plus climate change modelled flood level there would be no adverse effect on access and egress during an extreme flood event.

6.4 Details of the proposed surface water management in the northern part of the application area are presented in Section 7. Consistent with the information presented in respect of the proposed surface water management there will be no increase in rates of surface water runoff from the application area and on this basis there will be no increase in flood risk at or in the vicinity of the site as a result of the proposed development.

7. Surface water management

- 7.1** The purpose of this section of the FRA is to set out the principles of the management of surface water at the application area following development. Consideration is given to the quantity of surface water runoff that it may be necessary to manage during storm events.
- 7.2** The northern part of the application area has dimensions of approximately 50m by 100m and comprises porous hardstanding. Three bays for the IBAA storage and blending operations are proposed to be constructed on the hardstanding. The IBAA storage and blending bays will incorporate impermeable surfaces with sealed drainage systems.
- 7.3** Surface runoff from the IBAA storage and blending bays will be collected and contained in suitable storage tanks before being removed from the site for off site disposal. For the purpose of the calculations it is assumed that there would be no discharge from the drainage system during a storm event.
- 7.4** Each IBAA storage and blending bay will be approximately 30m long and 12.5m wide and have an area of approximately 375m² (0.0375 ha). In areas external to the IBAA storage and blending bays rainfall will continue to drain to ground consistent with the current situation.
- 7.5** Preliminary calculations of the proposed surface water management system are presented at Appendix D. The calculations are based on the Rational Method presented in the SuDS Manual (reference 4) and on design rainfall intensity data from the Flood Estimation Handbook (FEH) web service.
- 7.6** The calculations include an allowance for future climate change. Climate change allowances for individual catchment areas are presented on the gov.uk website¹. The central climate change allowance for the Nene Management Catchment for the 1% annual exceedance rainfall event and developments with a lifetime between 2061 and 2125 is 25%.

¹ <https://environment.data.gov.uk/hydrology/climate-change-allowances/rainfall?mgmtcatid=3059>

7.7 The calculations presented at Appendix D are based on the following assumptions:

- The assessment is based on runoff for a 24 hour duration 1 in 100 year rainfall event incorporating a 25% allowance for increased rainfall intensity as a result of future climate change.
- The area of each IBAA bay is 0.0375ha which comprises a sealed drainage system. As the drainage system will be sealed a rate of discharge from the drainage system of 0m³/day is assumed.
- Taking into account the generally granular texture of IBAA and aggregates the calculations are based on an estimated runoff coefficient of 0.46. Further details of the runoff coefficient estimation method are provided at Appendix D.

7.8 Based on the calculations presented at Appendix D it is estimated that a 24 hour 1 in 100 year plus climate change storm event would generate approximately 20m³ of runoff from each of the three IBAA storage and blending bays. On this basis it is considered that the storage capacity needed to contain runoff from the sealed drainage system associated with the three IBAA bays is 60m³ in total. This storage capacity will be provided by tank(s) of suitable specification and capacity. The sealed drainage system including the storage tanks will be subject to routine maintenance and monitoring the principles of which are set out below:

- Regular inspection of the sealed drainage system and tanks will be undertaken. The purpose of the inspections will be to confirm the adequate performance of the drainage system and tanks, to identify operational problems and to facilitate planning of maintenance actions as necessary.
- Insofar as it is practicable inspections of the sealed drainage system will be carried out in a range of weather conditions including during rainfall events.
- Maintenance actions will be planned and implemented as necessary to facilitate the proper functioning of the sealed drainage system and tanks.

Specific maintenance and management actions are likely to include but may not be limited to:

- Removal of debris such as leaves or litter identified within the tanks or conduits comprising the sealed drainage system as part of the regular inspections.
- Removal of silt or debris identified during emptying of the tanks. The silt or debris will be removed as part of the tank emptying operations and taken to a suitably permitted facility for treatment.
- Repair of defects or damage to the conduits or tanks of the sealed drainage system identified as part of the regular inspections. Should immediate repair not be feasible a suitably experienced contractor will be engaged to repair or replace any defective or damaged conduits or tanks.

7.9 The tank(s) will provide storage capacity to enable the recycling re-use of the collected water for use in dust suppression on the IBAA storage and blending bays in drier parts of the year. Any excess water will be tankered off site and disposed of at a suitably permitted facility facilitating inspection of the tanks and any necessary maintenance of the sealed drainage system as outlined above.

7.10 The northern part of the application area in which the IBAA storage and blending bays will be located will have an area of approximately 4,420m². Of this area approximately 1,125m² or about 25% of the total area will comprise a sealed drainage system following development. Runoff will continue to drain to ground consistent with the current situation in the approximately 75% of the northern part of the application area which will not comprise part of a sealed drainage system. On this basis it is estimated that following development the runoff generated from the northern part of the application area will be approximately 25% less than the current situation for storm events which generate runoff volumes less than the 24 hour duration 1 in 100 year plus 25% climate change storm event. On this basis it is estimated that the proposed development will result in a significant reduction in runoff rates during storm extreme storm events.

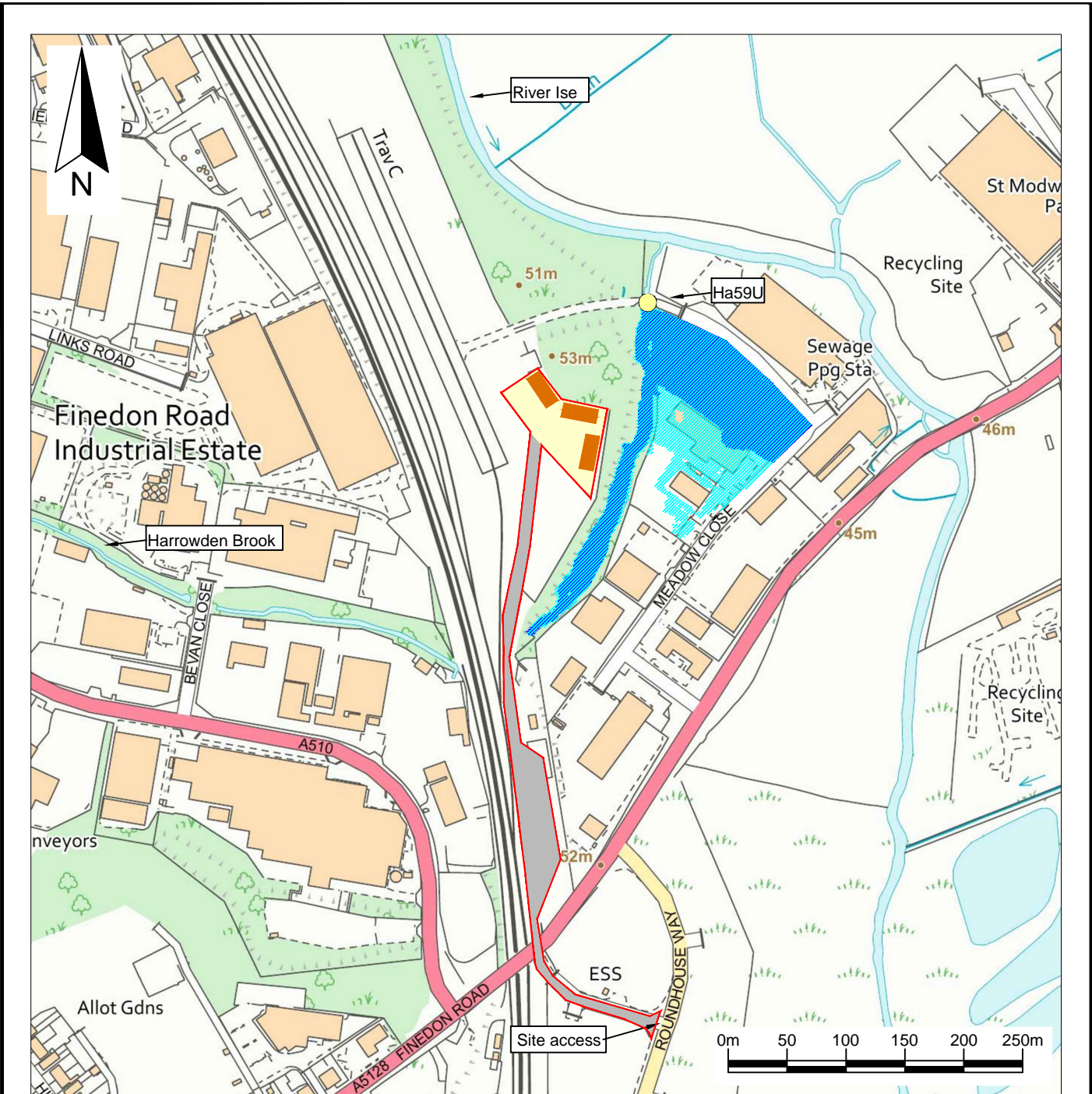
8. Conclusions

- 8.1** Based on the information reviewed it is considered that the northern part of the application area is not located in the fluvial floodplain and lies approximately 4m higher than the predicted flood levels for the 1 in 1000 year plus 20% climate change fluvial flood event. It is considered that neither the northern part of the application area or the site access road are located in the fluvial floodplain. On this basis it is considered that the risk of fluvial flooding to the application area is negligible.
- 8.2** It is considered that there are no significant risks to the application area associated with surface water flooding, reservoir flooding or groundwater flooding.
- 8.3** It is considered that the proposed development is consistent with the requirements of the flood risk Sequential Test hence is located appropriately with respect to minimising flood risk.
- 8.4** Based on the surface water runoff calculations undertaken the proposed development will result in a significant reduction in runoff rates from the application area during storm events. An outline drainage design is presented to specially accommodate the sealed drainage requirements under the environmental permitting regime in relation to the proposed IBAA area. Outline maintenance and monitoring procedures in respect of the sealed drainage system are proposed.

9. References

1. Ministry of Housing, Communities & Local Government, 2021. National Planning Policy Framework. <https://www.gov.uk/government/publications/national-planning-policy-framework-2>. Accessed on 28 July 2023.
2. Ministry of Housing, Communities & Local Government, 2021. National Planning Policy Framework Guidance. Flood Risk and coastal change. <https://www.gov.uk/guidance/flood-risk-and-coastal-change>. Accessed on 28 July 2023.
3. Northampton County Council (on behalf of the Borough Council of Wellingborough). 2017. Level 1 Strategic Flood Risk Assessment Update. February 2017.
4. Woods Ballard, B., Wilson, S., Udale-Clarke, H., Illman, S., Scott, T., Ashley, R. and Kellagher, R. 2015. The SuDS Manual. CIRIA, London.

FIGURES



Key / Notes

- Application area
- Storage area for imported and blended IBAA
- Existing hardstanding area
- Site access road
- Approximate location of flood model node Ha59U

Approximate extent of the area upstream of model node Ha59U for which ground levels are lower than the 1 in 100 year plus 20% climate change flood level of 44.97m AOD.

Approximate extent of the area upstream of model node Ha59U for which ground levels are lower than the 1 in 1000 year plus 20% climate change flood level of 45.51m AOD.

Note:
Ground levels are based on the Environment Agency 2022 1m LIDAR Digital Terrain Model.

Rev	Final	TL	CJC	JRC	16/08/23
	Status	Drn	App	Chk	Date
Site WELLINGBOROUGH					
Client GRS Roadstone Limited					
Title Site location and layout					
Figure 1				Scale 1:5,000@A4	
Drawing Ref GRS/WE/08-23/23860					
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APPENDIX A

**DAVID L WALKER LIMITED PLAN ENTITLED "IBAA IMPORT – LAYOUT PLAN"
REFERENCE W78/PL3/03 DATED JULY 2023**

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GRID NORTH



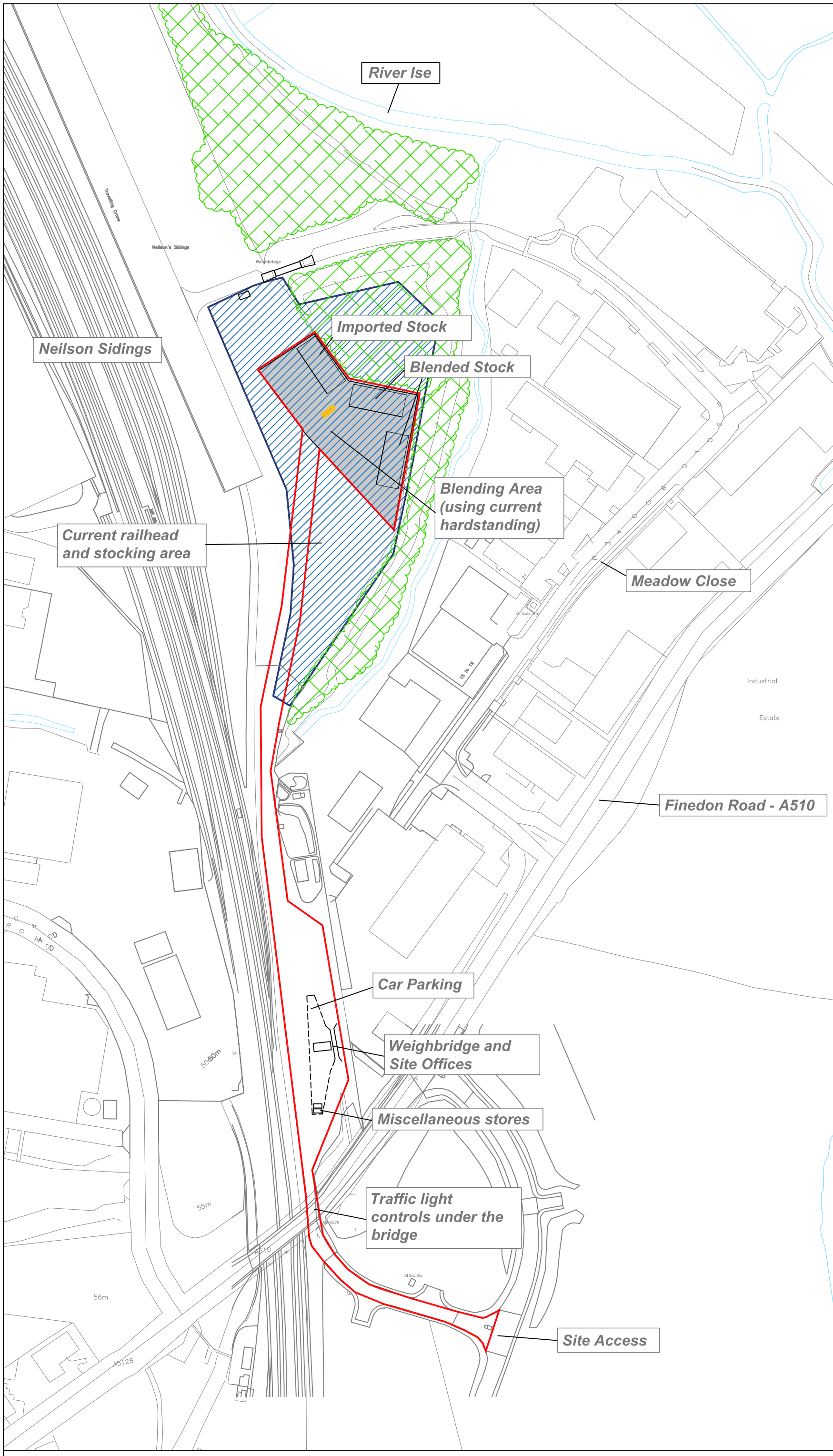
Application Area



Current Permitted Area



Perimeter Vegetation



Revision No.		Revision By.
Date.		



Location
Wellingborough Railhead

Title
IBAA Import - Layout Plan

Drg.No.	Scale	Date
W78/PL3/03	1:2000@A3	07/23



Albion House 89 Station Road
Eckington Sheffield S21 4FW

Tel: 01246 431 749 Fax: 01246 431 863
Email: headoffice@dlwalker.net

APPENDIX B

**INFORMATION ON FLOOD RISK REQUESTED FROM THE EA COMPRISING THE
PRODUCT 4 PACKAGE OF INFORMATION**

Keith Wright
keithwright@mjca.co.uk

Our ref: CCN-2023-315791

Date: 17/07/2023

Dear Keith,

Provision of Flood Risk Information for Burrow's Bush, Wellingborough.

Thank you for your request for our flood risk information for the above site. The information is set out below and attached. It is important you read any contextual notes on the maps provided.

If you are preparing a Flood Risk Assessment (FRA) for this site, please note this information may not be sufficient by itself to produce an adequate FRA to demonstrate the development is safe over its lifetime. Additional information may be required to carry out an appropriate assessment of all risk, such as consequence of a breach in defences.

We aim to review our information on a regular basis, so if you are using this data more than twelve months from the date of this letter, please contact us again to check it is still valid.

Please read the letter in full as the information covered has been updated in **June 2023**.

1. Flood Map for Planning

The attached map includes the current Flood Map for Planning for your area. The map indicates the area at risk of flooding, **assuming no flood defences exist**, for a flood with a 0.5% chance of occurring in any year for flooding from the sea, or a 1% chance of occurring for fluvial (river) flooding. It also shows the extent of the Extreme Flood Outline which represents the extent of a flood with a 0.1% chance of occurring in any year, or the highest recorded historic extent if greater.

In some locations, such as around the fens and the large coastal floodplains, showing the area at risk of flooding assuming no defences may give a slightly misleading picture in that if there were no flood defences, water would spread out across these large floodplains. This flooding could cover large areas of land but to relatively shallow depths and could leave pockets of locally slightly higher land as isolated dry islands. It is important to understand the actual risk of the flooding to these dry islands, particularly in the event of defence failure.

The Flood Map for Planning also shows the location of formal raised flood defences and flood storage reservoirs. It represents areas at risk of flooding for present day only and does not take account of climate change.

The Flood Map for Planning only indicates the extent and likelihood of flooding from rivers or the sea. It should also be remembered flooding may occur from other sources such as surface water sewers, road drainage, etc.

2. Recorded Flood Outlines

The area was previously known to have flooded in March 1947 and April 1998.

A copy of the Recorded Flood Outlines Map showing the extent of previous recorded flooding in your area is attached. This only covers information we hold and it is possible recent flooding may have occurred which we are currently investigating, therefore this information may be subject to change. It is possible other flooding may have occurred which other organisations, such as the Lead Local Flood Authority (ie top tier council), Local Authority or Internal Drainage Board (where they exist), may have records.

3. Schemes in the area

There are no ongoing capital projects to reduce or sustain the current flood risk to this site.

4. Fluvial Flood Risk Information

This site is considered to be at risk of flooding from main rivers.

The site may also be at risk from local ordinary watercourses for which other risk management authorities, such as the Lead Local Flood Authority (ie top tier council) or Internal Drainage Board (where they exist) have responsibility.

4.1 Fluvial Defence Information

There are no formal flood defences reducing the risk of flooding to this site.

4.2 Fluvial Modelled Levels and Flows

Available modelled fluvial flood levels and flows for the model nodes shown on the attached map are set out in the data table attached. This data is taken from the model named on the data table, which is the most up-to-date model currently available.

Please note these levels are “in-channel” levels and therefore may not represent the flood level on the floodplain, particularly where the channel is embanked or has raised defences.

Our models may not have the most up to date climate change allowances. In time we will update our models for the latest allowances. You should refer to '[Flood risk assessments: climate change allowances](#)' to check if the allowances modelled are appropriate for the type of development you are proposing and its location. You may need to undertake further assessment of future flood risk using different allowances to ensure your assessment of future flood risk is based on best available evidence.

4.3 Fluvial Modelled Flood Extents

Please find attached a map showing available modelled flood extents, taking into account flood defences, for your area. This data is taken from the model named on the map, which is the most up-to-date model currently available.

In some cases the flood extents shown may not be from main river, but may be from other sources such as IDB lowland drainage networks.

4.4 Fluvial Hazard Mapping

For certain locations we have carried out modelling to map the maximum values of flood depth, velocity and hazard rating (danger to people) resulting from overtopping and / or breaching of defences at specific locations for a number of scenarios.

At present this information is available for fluvial flood risk in Northampton, Lincoln, Wainfleet and some isolated rural locations.

The number of locations we have this information for is expected to increase in time.

At present this site is not covered by any fluvial hazard mapping.

5. Tidal Flood Risk Information

This site is not considered to be at risk from tidal flooding.

6. Development Planning

If you would like local guidance on preparing a flood risk assessment for a planning application, please contact our Sustainable Places team at LNplanning@environment-agency.gov.uk. It will help if you mention this data request and attach your site location plan.

We provide free preliminary advice; additional/detailed advice, review of draft FRAs and meetings are chargeable at a rate set to cover our costs, currently £100 (plus VAT) per hour of staff time. Further details are available on our website at <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>.

General advice on flood risk assessment for planning applications can be found on GOV.UK at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Climate change will increase flood risk due to overtopping of defences. Please note, unless specified otherwise, the climate change data included has an allowance for 20% increase in flow. Updated guidance on how climate change could affect flood risk to new development - 'Flood risk assessments: climate change allowances' was published on GOV.UK in **July 2021**. The appropriate updated climate change allowance should be applied in a Flood Risk Assessment.

You should also consult the Strategic Flood Risk Assessment produced by your local planning authority.

7. Data Licence and Other Supporting Information

We respond to requests for recorded information we hold under the Freedom of Information Act 2000 (FOIA) and the associated Environmental Information Regulations 2004 (EIR).

This information is provided in accordance with the Open Government Licence which can be found here: <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Further information on flood risk can be found on the GOV.UK website at:
<https://www.gov.uk/browse/environment-countryside/flooding-extreme-weather>

8. **Other Flood Risk Management Authorities**

The information provided with this letter relates to flood risk from main river or the sea. The Flood Map for Surface Water can be viewed at <https://www.gov.uk/check-long-term-flood-risk>

Additional information may be available from other risk management authorities, such as the Lead Local Flood Authority (ie top tier council) or Internal Drainage Board (where they exist).

I hope we have correctly interpreted your request. If you have any queries or would like to discuss the content of this letter further please contact Annabelle Webster using the email address below and quoting our CCN reference number above.

Yours sincerely,



020 302 53535

for Alastair Windler
Welland and Nene Partnerships and Strategic Overview Team Leader
e-mail PSOWN@environment-agency.gov.uk

Enc.
Flood Map for Planning
Recorded Flood Event Outlines Map
Modelled Node Points Map
Modelled Fluvial Levels and Flows Data Sheet
Modelled Flood Extent Maps

Flood Map centred on SP 90457 69639 - created July 2023 [Ref: CCN-2023-315791]



Scale 1:10,000



Legend

- Main Rivers
- Raised Defences
- Flood Storage Areas
- Areas at Risk of Flooding from Rivers or the Sea
- Extreme Flood Outline

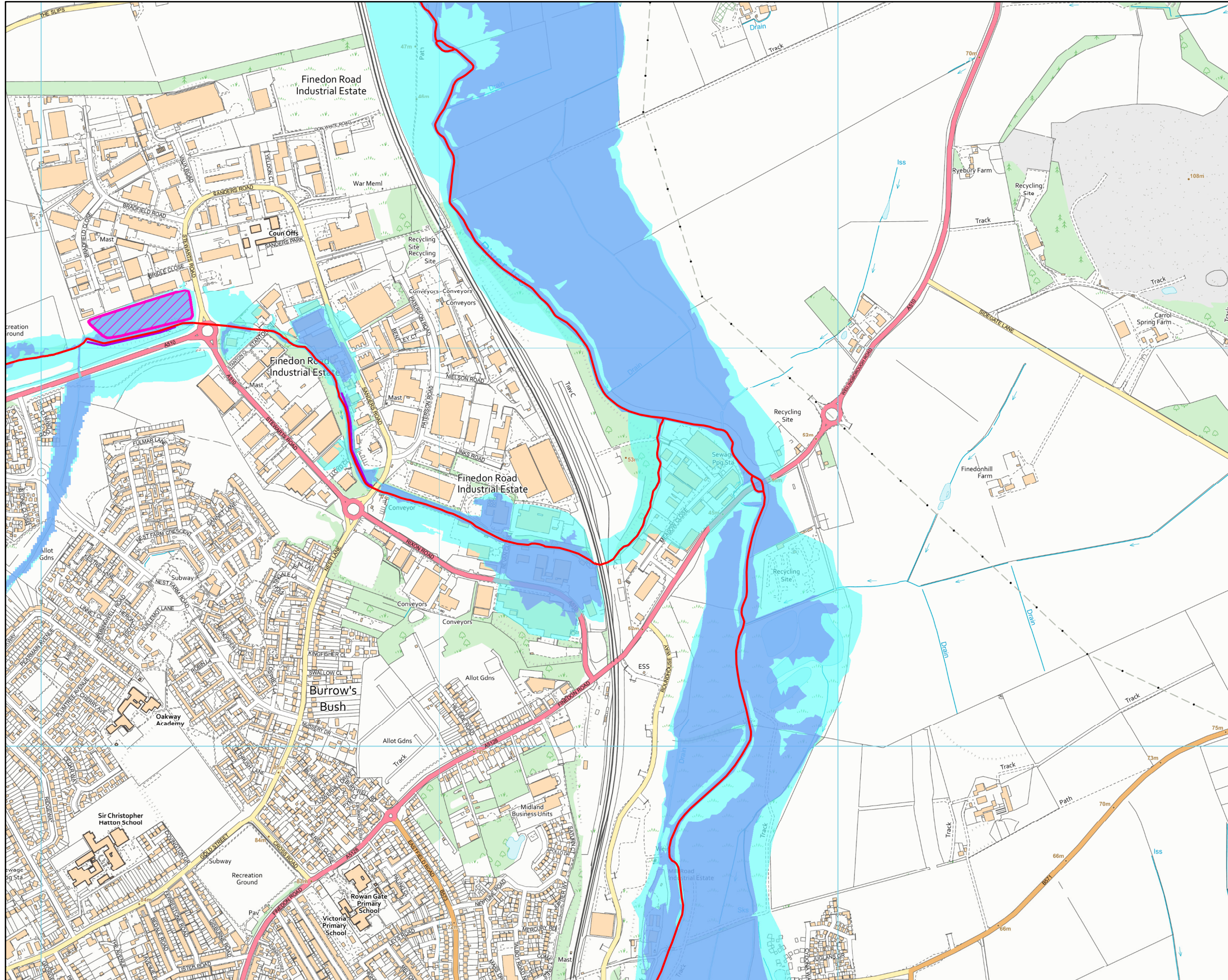
Dark blue shows the area that could be affected by flooding, either from rivers or the sea, if there were no flood defences. This area could be flooded:

- from the sea by a flood that has a 0.5% (1 in 200) or greater chance of happening each year.
- or from a river by a flood that has a 1% (1 in 100) or greater chance of happening each year.

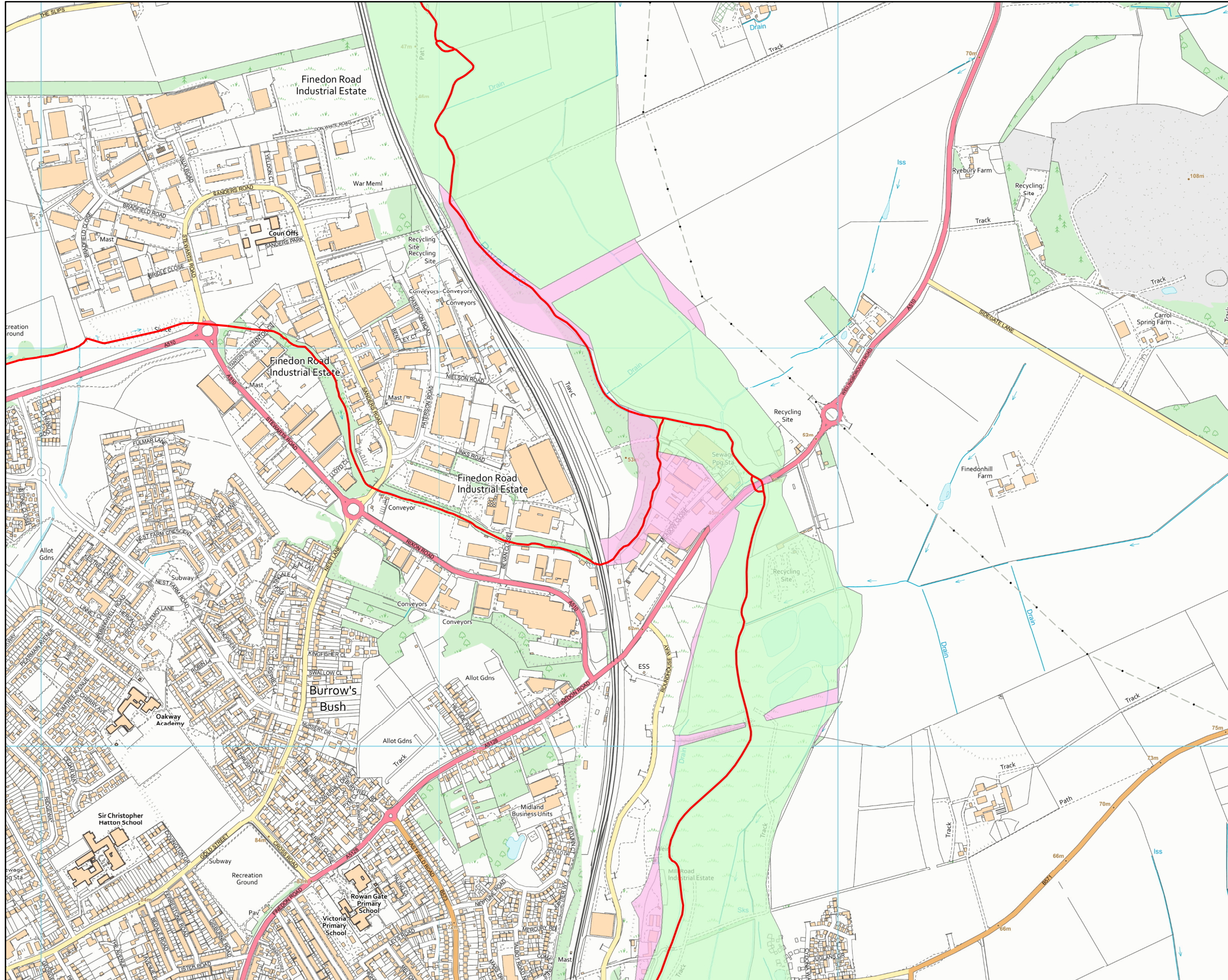
Light blue shows the extent of the Extreme Flood Outline, which represents the extent of a flood event with a 0.1% chance of occurring in any year, or the highest recorded historic extent if greater.

These two colours show the extent of the natural floodplain if there were no flood defences or certain other manmade structures and channel improvements. Sites outside the two extents, but behind raised defences, may be affected by flooding if the defences are overtopped or fail.

Created by the Partnerships and Strategic Overview Team, Kettering






Historic Flood Map centred on SP 90457 69639 - created July 2023 [Ref: CCN-2023-315791]



Scale 1:10,000



Legend

-  Main Rivers
- Event name**
-  LNA_1947_March_River Nene_d/s Northampton
-  LNA_1998_April_River Ise

Created by the Partnerships and Strategic Overview Team, Kettering

Harrowden Brook Modelled Node Points Map centred on SP 90457 69639 - created July 2023 [Ref: CCN-2023-315791]

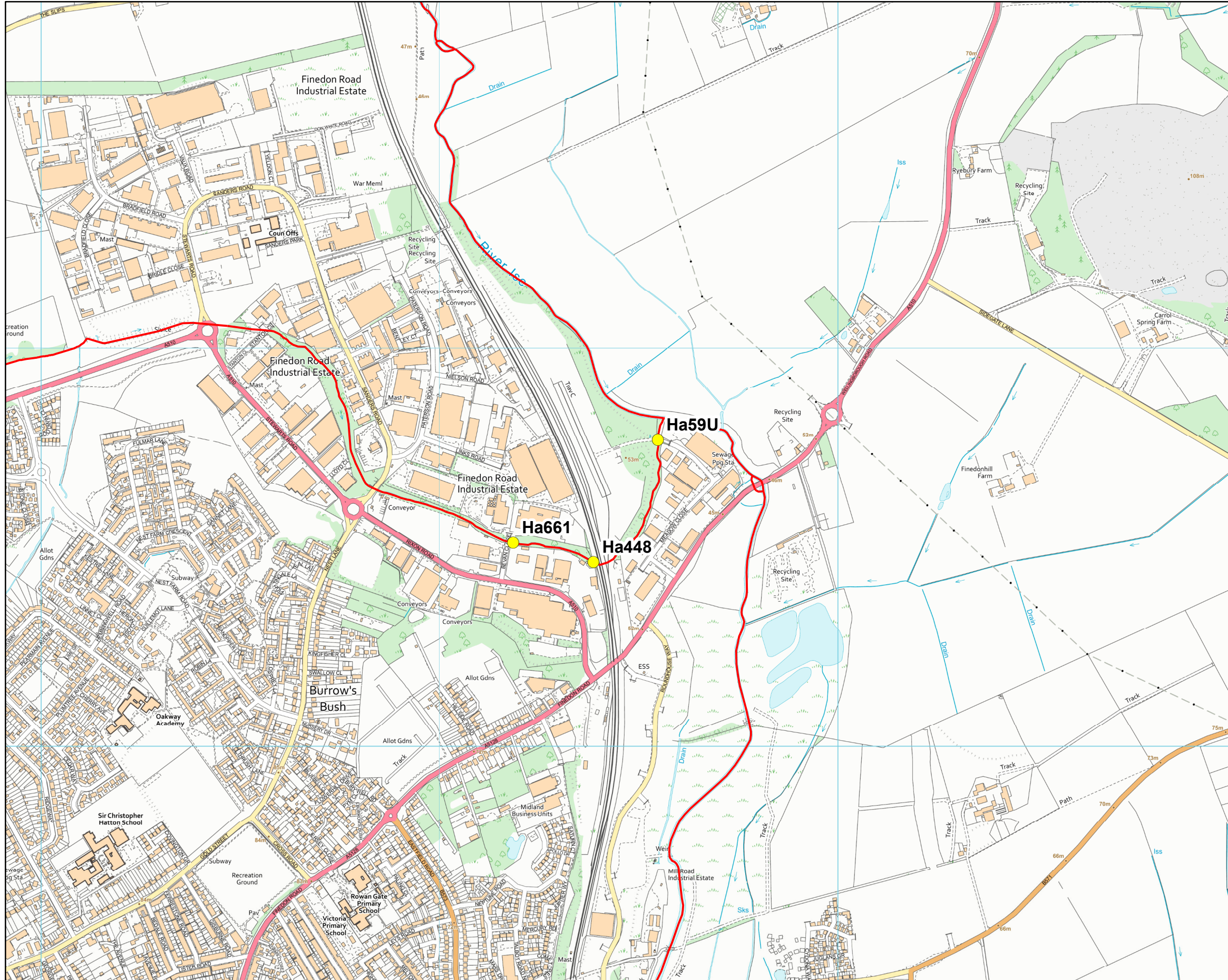


Scale 1:10,000



Legend

- Model Nodes - Levels & Flows
- Main Rivers



Created by the Partnerships and Strategic Overview Team, Kettering

Fluvial Flood Levels (mODN)

The fluvial flood levels for the model nodes shown on the attached map are set out in the table below. They are measured in metres above Ordnance Datum Newlyn (mODN).

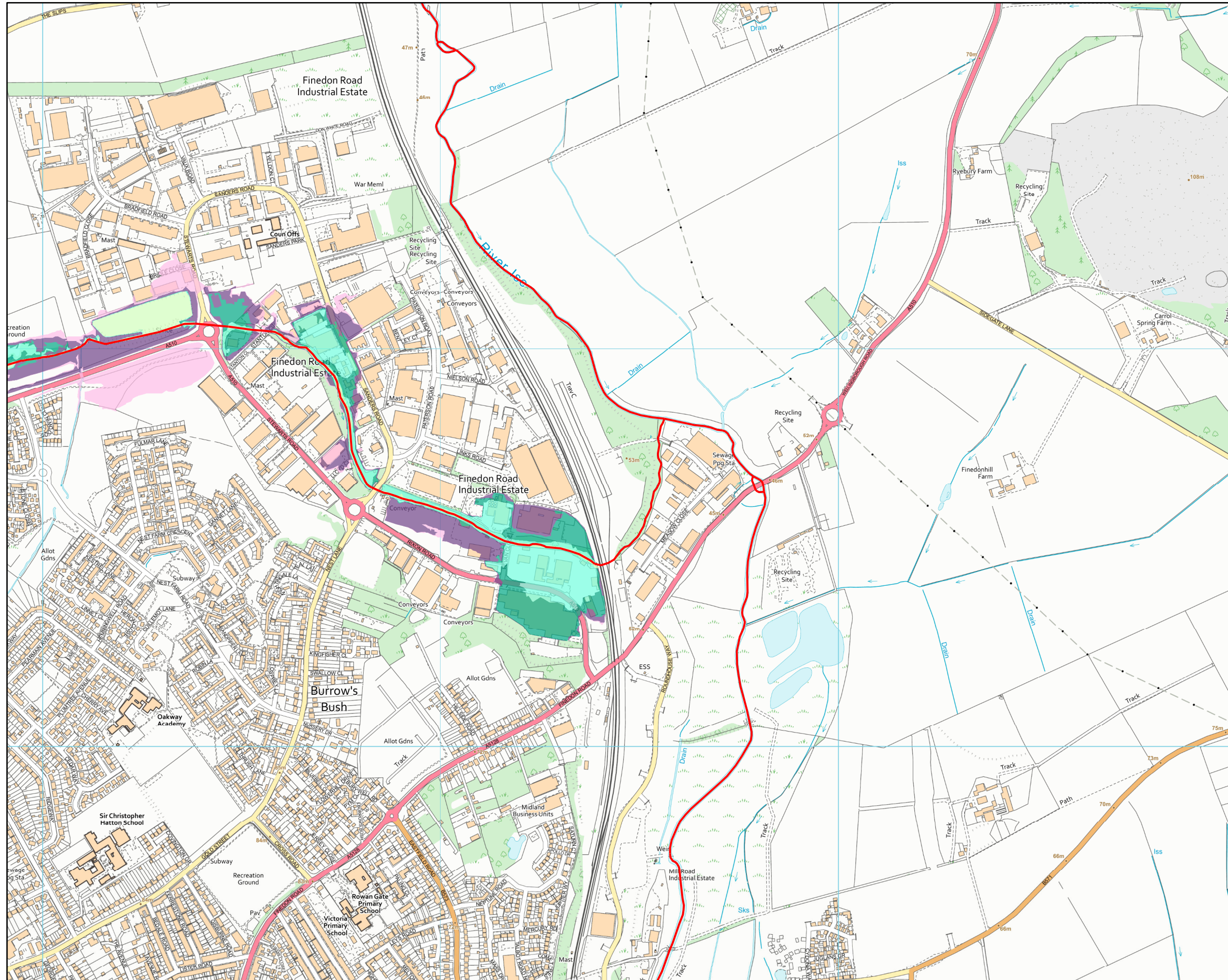
Node Label	Easting	Northing	Annual Exceedance Probability - Maximum Water Levels (mODN)													
			50% (1 in 2)	20% (1 in 5)	10% (1 in 10)	5% (1 in 20)	4% (1 in 25)	4% (1 in 25) inc 20% Climate Change	2% (1 in 50)	1.33% (1 in 75)	1% (1 in 100)	1% (1 in 100) inc 20% Climate Change	0.5% (1 in 200)	0.5% (1 in 200) inc 20% Climate Change	0.1% (1 in 1000)	0.1% (1 in 1000) inc 20% Climate Change
Ha448	490387	269463	45.63	45.93	46.09	46.33	47.00	0.00	48.32	48.82	49.11	49.68	49.74	0.00	49.91	49.95
Ha59U	490548	269769	44.03	44.17	44.30	44.43	44.51	0.00	44.70	44.78	44.84	44.97	44.98	0.00	45.33	45.51
Ha661	490185	269511	45.96	46.13	46.25	46.44	47.03	0.00	48.32	48.82	49.11	49.68	49.74	0.00	49.92	49.95

Fluvial Flood Flows (m³/s)

The fluvial flood flows for the model nodes shown on the attached map are set out in the table below. They are measured in metres cubed per second (m³/s).

Node Label	Easting	Northing	Annual Exceedance Probability - Maximum Flows (m ³ /s)													
			50% (1 in 2)	20% (1 in 5)	10% (1 in 10)	5% (1 in 20)	4% (1 in 25)	4% (1 in 25) inc 20% Climate Change	2% (1 in 50)	1.33% (1 in 75)	1% (1 in 100)	1% (1 in 100) inc 20% Climate Change	0.5% (1 in 200)	0.5% (1 in 200) inc 20% Climate Change	0.1% (1 in 1000)	0.1% (1 in 1000) inc 20% Climate Change
Ha448	490387	269463	4.90	5.58	5.91	6.39	7.67	0.00	9.83	10.56	10.96	12.01	14.02	0.00	30.65	35.49
Ha59U	490548	269769	4.90	5.58	5.91	6.39	7.66	0.00	9.83	10.56	10.96	12.01	14.03	0.00	26.05	26.96
Ha661	490185	269511	4.92	5.62	5.94	6.50	8.14	0.00	10.61	12.08	13.31	17.91	18.98	0.00	30.73	35.54

Modelled Flood Extents (with defences) Model: Harrowden Brook (2012) centred on SP 90457 69639 - created July 2023 [Ref: CCN-2023-315791]



Scale 1:10,000



Legend

- Main Rivers
- 5% (1 in 20) fluvial event
- 1% (1 in 100) fluvial event
- 1% (1 in 100) inc 20% climate change fluvial event
- 0.1% (1 in 1000) fluvial event
- 0.1% (1 in 1000) inc 20% climate change fluvial event

Created by the Partnerships and Strategic Overview Team, Kettering

Middle Nene Modelled Node Points Map centred on SP 90457 69639 - created July 2023 [Ref: CCN-2023-315791]

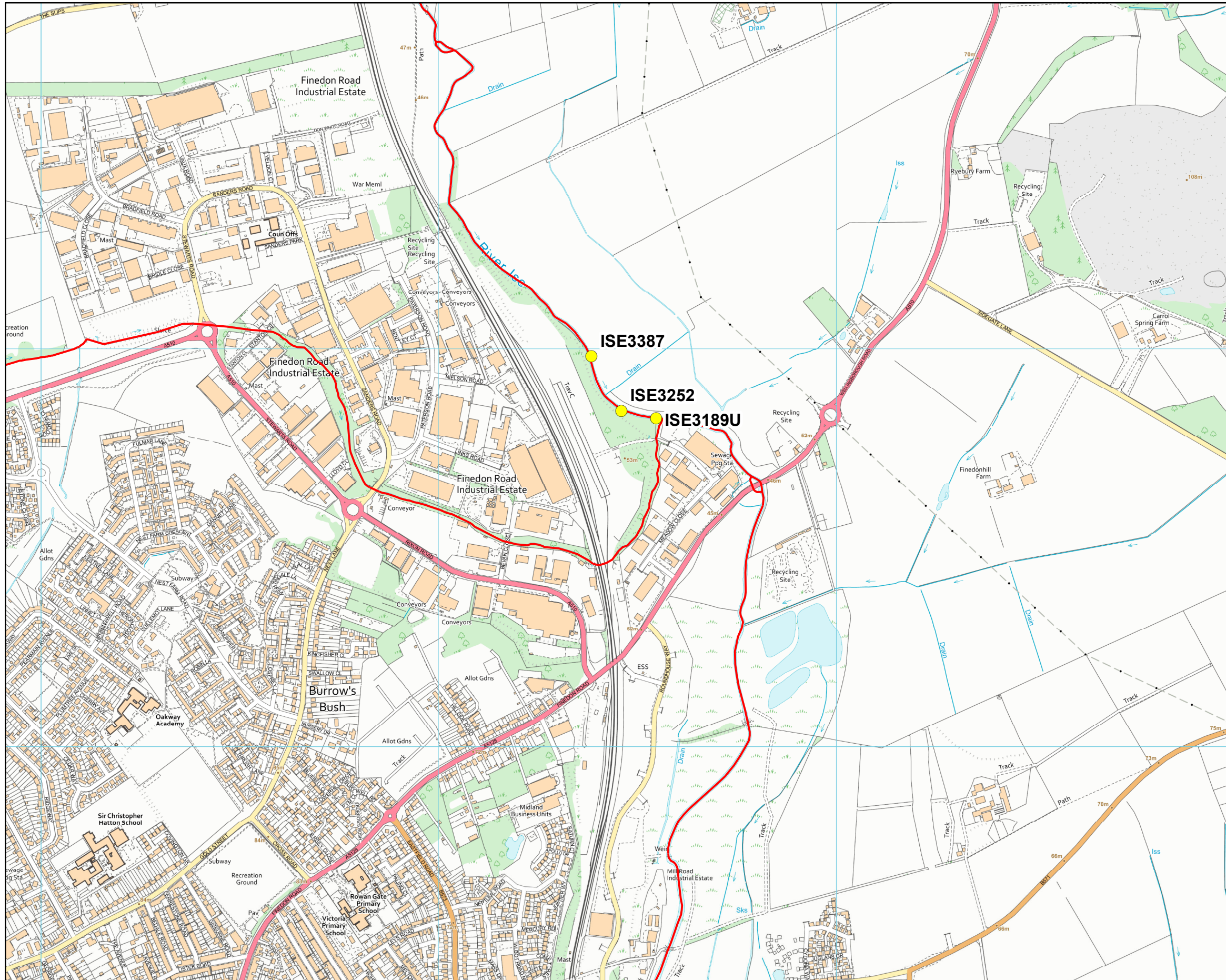


Scale 1:10,000



Legend

- Model Nodes - Levels & Flows
- Main Rivers



Created by the Partnerships and Strategic Overview Team, Kettering

Fluvial Flood Levels (mODN)

The fluvial flood levels for the model nodes shown on the attached map are set out in the table below. They are measured in metres above Ordnance Datum Newlyn (mODN).

Node Label	Easting	Northing	Annual Exceedance Probability - Maximum Water Levels (mODN)												
			50% (1 in 2)	20% (1 in 5)	10% (1 in 10)	5% (1 in 20)	4% (1 in 25)	2% (1 in 50)	1.33% (1 in 75)	1% (1 in 100)	1% (1 in 100) inc 20% Climate Change	0.5% (1 in 200)	0.5% (1 in 200) inc 20% Climate Change	0.1% (1 in 1000)	0.1% (1 in 1000) inc 20% Climate Change
ISE3387	490384	269981	43.98	44.15	44.24	44.30	44.33	44.42	44.43	44.43	44.52	44.53	44.63	44.71	44.81
ISE3252	490459	269844	43.83	44.04	44.15	44.23	44.26	44.37	44.38	44.38	44.48	44.48	44.59	44.67	44.78
ISE3189U	490547	269825	43.80	44.02	44.14	44.22	44.25	44.35	44.36	44.36	44.46	44.47	44.57	44.66	44.76

Fluvial Flood Flows (m³/s)

The fluvial flood flows for the model nodes shown on the attached map are set out in the table below. They are measured in metres cubed per second (m³/s).

Node Label	Easting	Northing	Annual Exceedance Probability - Maximum Flows (m ³ /s)												
			50% (1 in 2)	20% (1 in 5)	10% (1 in 10)	5% (1 in 20)	4% (1 in 25)	2% (1 in 50)	1.33% (1 in 75)	1% (1 in 100)	1% (1 in 100) inc 20% Climate Change	0.5% (1 in 200)	0.5% (1 in 200) inc 20% Climate Change	0.1% (1 in 1000)	0.1% (1 in 1000) inc 20% Climate Change
ISE3387	490384	269981	17.37	21.87	23.50	24.86	25.39	26.77	26.94	26.95	28.33	28.37	29.63	29.90	29.93
ISE3252	490459	269844	12.18	13.31	13.74	14.08	14.36	15.53	15.69	15.70	17.26	17.32	19.15	20.50	22.63
ISE3189U	490547	269825	10.73	11.14	11.55	12.24	12.58	13.95	14.11	14.12	15.62	15.67	17.45	18.75	20.23

**Modelled Flood Extents (with defences) Model: Middle Nene (2013)
centred on SP 90457 69639 - created July 2023 [Ref: CCN-2023-315791]**

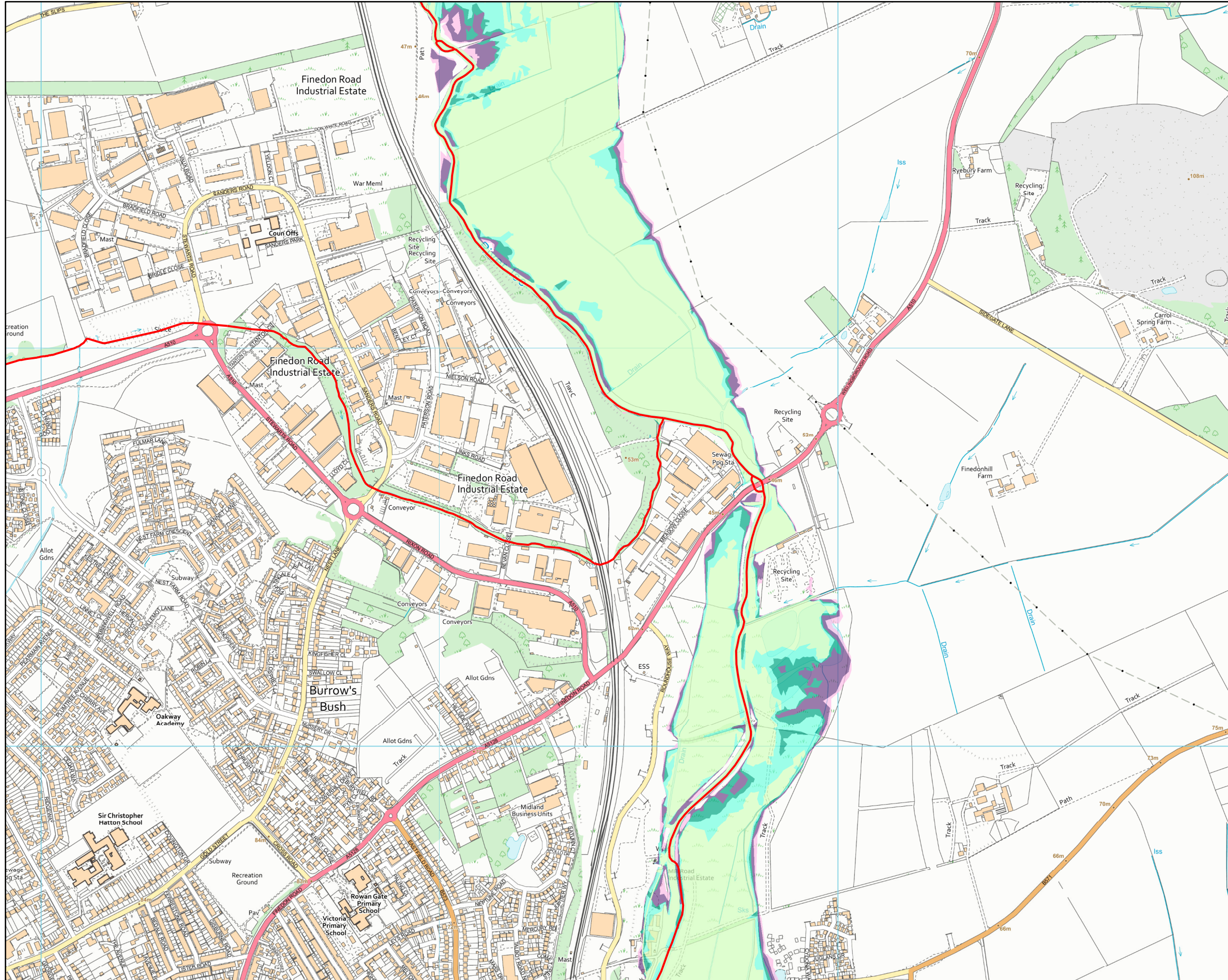


Scale 1:10,000



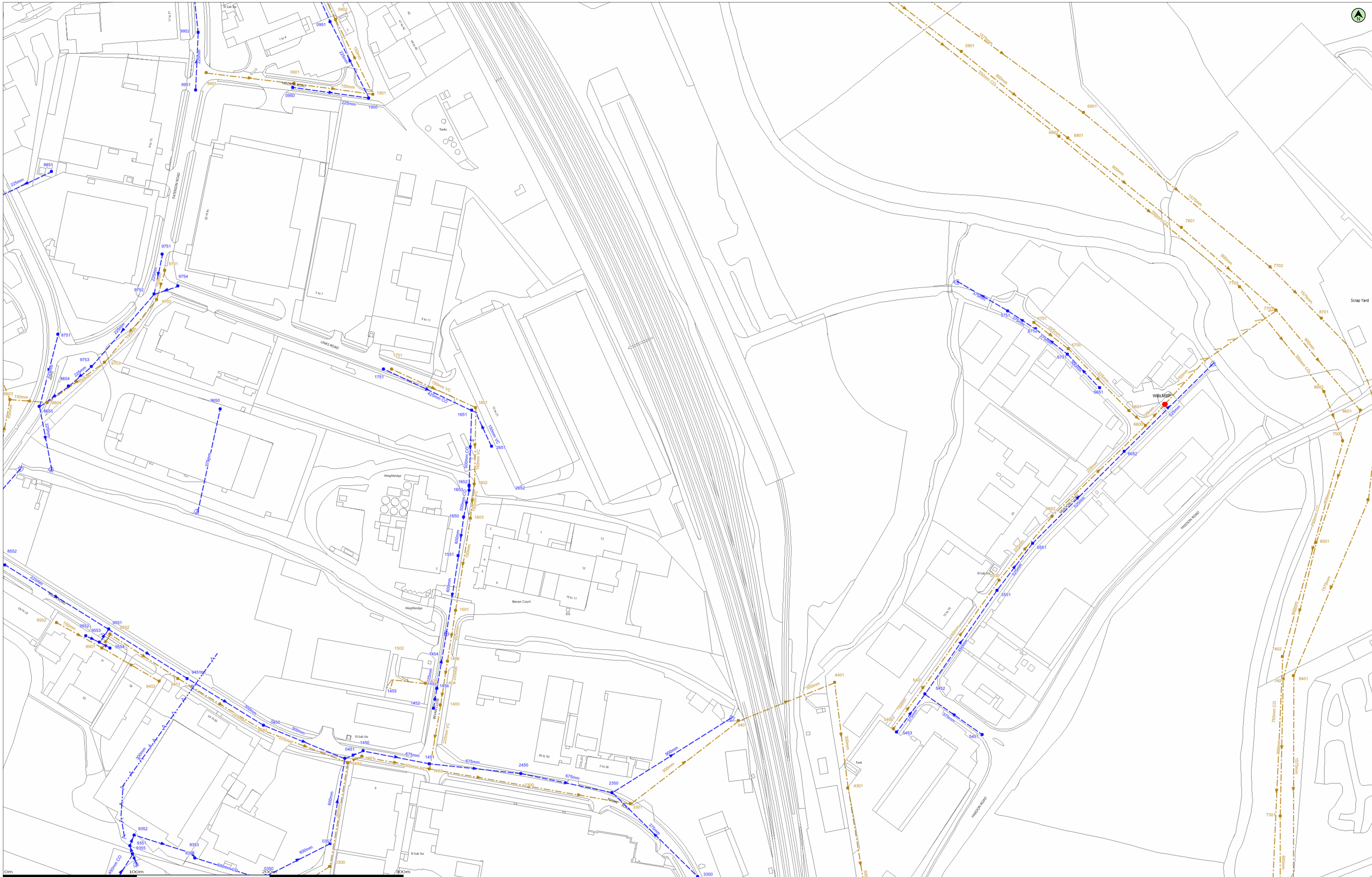
Legend

- Main Rivers
- 5% (1 in 20) fluvial event
- 1% (1 in 100) fluvial event
- 1% (1 in 100) inc 20% climate change fluvial event
- 0.1% (1 in 1000) fluvial event
- 0.1% (1 in 1000) inc 20% climate change fluvial event



Created by the Partnerships and Strategic Overview Team, Kettering

APPENDIX C
ANGLIAN WATER SEWER PLAN



(c) Crown copyright and database rights 2023 Ordnance Survey 100022432 Date: 03/07/23 Scale: 1:1250 Map Centre: 490351,269659 Data updated: 31/05/23 Our Ref: 1215449 - 1 Wastewater Plan A1

This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown. Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or disposal main or any item of apparatus. This information is valid for the date printed. This plan is produced by Anglian Water Services Limited (c) Crown copyright and database rights 2023 Ordnance Survey 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other uses of the map data or further copies is not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

Foul Sewer	— — — — —	Outfall*	— — — — —
Surface Sewer	— — — — —		
Combined Sewer	— — — — —		
Final Effluent	— — — — —	Inlet*	— — — — —
Rising Main*	— — — — —		
Private Sewer*	— — — — —	Manhole*	○
Decommissioned Sewer*	— — — — —		

⊕	Sewage Treatment Works	□	dan.walker@dlwalker.net
⊕	Public Pumping Station	●	Wellingborough RH
●	Decommissioned Pumping Station	●	
	(Colour denotes effluent type)		



APPENDIX D
SURFACE RUNOFF CALCULATIONS

Calculation of attenuation storage during a 1 in 100 year storm event plus an allowance for climate change for the site using the Rational Method (reference 1)

Parameter	Value	Units	Reference
Catchment area	0.0375	ha	Approximate area of each IBAA storage and blending bay.
Net discharge rate	0	m ³ /day	The site will comprise a sealed drainage system. For the purpose of the calculations it is assumed that there would be no discharge from the drainage system during a storm event.
Runoff coefficient	0.46	unitless	The runoff coefficient has been estimated using a calculation method derived consistent with the nomogram presented on Figure 3 of reference 1. A vegetation type of bare earth is assumed and a soil type of sand and gravel is assumed. A stockpile gradient of 1v:2h is assumed.
Climate change factor	25%	unitless	The recommended precautionary increase in peak rainfall intensity to allow for climate change during the period 2061 to 2125 (reference 3).

Storm Duration (hr)	Rainfall for the site derived from reference 2 (mm)	Rainfall Intensity corrected for climate change (mm/hr)	Volume of rainfall runoff in time period (m ³)	Outflow in time period (m ³)	Storage necessary in time period (m ³)
0.25	28.87	144.35	6.23	0.00	6
0.5	37.5	93.75	8.09	0.00	8
0.75	42.73	71.22	9.21	0.00	9
1	46.59	58.24	10.05	0.00	10
1.25	49.76	49.76	10.73	0.00	11
1.5	52.46	43.72	11.31	0.00	11
1.75	54.81	39.15	11.82	0.00	12
2	56.9	35.56	12.27	0.00	12
2.25	58.83	32.68	12.69	0.00	13
2.5	60.58	30.29	13.06	0.00	13
2.75	62.17	28.26	13.41	0.00	13
3	63.63	26.51	13.72	0.00	14
3.25	64.98	24.99	14.01	0.00	14
3.5	66.23	23.65	14.28	0.00	14
3.75	67.39	22.46	14.53	0.00	15
4	68.48	21.40	14.77	0.00	15
4.25	69.47	20.43	14.98	0.00	15
4.5	70.4	19.56	15.18	0.00	15
4.75	71.27	18.76	15.37	0.00	15
5	72.09	18.02	15.54	0.00	16
5.25	72.86	17.35	15.71	0.00	16
5.5	73.59	16.73	15.87	0.00	16
5.75	74.28	16.15	16.02	0.00	16
6	74.93	15.61	16.16	0.00	16
12	84.31	8.78	18.18	0.00	18
24	91.43	4.76	19.71	0.00	20

References

- Reference 1. National Coal Board, 1982. Technical Management of Water in the Coal Mining Industry.
- Reference 2. Flood Estimation Handbook web service <https://fehweb.ceh.ac.uk/>
- Reference 3. <https://environment.data.gov.uk/hydrology/climate-change-allowances/rainfall?mgmtcatid=3059>

Input

Output

