

12a Regent Street
Leamington Spa
Warwickshire
CV32 5HQ

Our ref: UT/2015/113995/01-L01
Your ref: Area Designation
Date: 10 March 2015

Dear Sir,

**NEIGHBOURHOOD PLAN AREA CONSULTATION FOR BAGINTON BUBBENHALL
STONELEIGH AND ASHOW**

BAGINTON, BUBBENHALL, STONELEIGH AND ASHOW

Thank you for engaging with the Environment Agency for the designation of the above area.

Drawing up a neighbourhood plan is an opportunity to think about improving a local environment. General opportunities for neighbourhood planning include:

- New green spaces or improvements to public space through new development. This could include linking open spaces to make green corridors for people and wildlife, planting trees, or making improvements to local waterways.
- Helping a community to manage the risk of flooding by providing landscaping to manage and store water and by promoting the use of sustainable drainage systems (SuDS).
- It could also help to promote the use of wood and recycled materials in construction and encourage energy efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those using the building. This will also help the environment by reducing emissions and improving air quality.

A key principle of the planning system is to promote sustainable development. Sustainable development meets the needs for housing, employment and recreation while improving the environment. It ensures that the right development is built in the right place at the right time.

To assist in the preparation of any document and sustainable development we have identified the following information to help you maximise environmental gain from future development and to reduce its environmental impact.

Water Quality

The Water Framework Directive (WFD) came into force on December 2000 and was transposed into UK law in December 2003. The first principle of the WFD is to prevent deterioration in aquatic ecosystems. No deterioration requires that a water body does not deteriorate from its current ecological or chemical classification and applies to individual pollutants within the water body.

There are five WFD river catchments within, or just falling outside of the neighbourhood area:

- GB109054044620, River Sherbourne;
- GB109054043920, River Avon;
- GB109054043840, River Avon;
- GB109054044540, River Sowe; and
- GB109054044480, Finham Brook

The waterbodies are achieving a 'Moderate' or 'Good' status.

The Environment Agency has worked with a number of partners to deliver a variety of projects in the Warwickshire Avon catchment that have sought to mitigate pressures preventing good status in water bodies. These have included community projects to reduce pollution from urban areas in Coventry, mitigating barriers to fish movements on the River Sowe, soil management workshops for farmers and campaigns to educate the public and businesses about misconnections to surface water drains.

It is hoped that any Neighbourhood Plan in this area would actively encourage practices and developments that would help prevent deterioration in water quality and maximise the environmental benefits. In particular, it is hoped that farmers are encouraged to reduce their inputs into local watercourses in order to improve the local water environment.

We would welcome the opportunity to provide advice on practices and future proposals to avoid unexpected issues arising.

Water Resources

The Neighbourhood Plan should take into account the availability of potable water supply when assessing new development in the area. The parish lies within the area supplied by Severn Trent Water and it is assumed that any additional water will be supplied using existing courses and under existing abstraction licence permissions. Advice should be sought from the water company to find out whether this is the case, or whether new sources will be needed in the future. For further information on where water is available for abstraction in the area, please see:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291400/LIT_2604_7a244e.pdf

Every opportunity should be taken to build water efficiency into new developments and innovative approaches should be encouraged.

Any proposed development should consider setting high standards regarding water use and other indicators to deliver sustainable development. Making a minimum of Code Level 3 or 4 of the Code for Sustainable Homes mandatory, would ensure high water efficiency and sustainability performance is achieved for all buildings.

We encourage water efficiency in all development. For residential proposals, we recommend a minimum standard of Level 3 of the Code For Sustainable Homes. For advice see:

http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf

For commercial use, we recommend rainwater harvesting and grey water recycling. Development should try to meet the 'very good' rating under the BREEAM Standard for non-residential development. www.breeam.org

Flood Risk

The Parishes contains sections of Main River: River Avon, River Sowe, Finham Brook. The floodplain extent can be viewed in the 'What's in your Backyard?' section of the Environment Agency's website at www.environment-agency.gov.uk

We would hope that any Neighbourhood Plan in this area would consider the need not only that flood risk does not increase, but will seek to actively reduce flood risk and provide betterment wherever possible in line with paragraph 100 of National Planning Policy Framework (NPPF). It is also considered appropriate for a Neighbourhood Plan to investigate possibilities to enhance watercourse corridor biodiversity, as well as contribute to achieving WFD aims of improving the ecological status of the waterbody.

Although the Environment Agency will remain concerned with flooding from main rivers, the Lead Local Flood Authority (in this case Warwickshire County Council) is the lead for local flood risk which includes groundwater, surface water and ordinary watercourses and should be included in any discussions. Further information about flood risk can be found in the Warwickshire County Councils Strategic Flood Risk Assessment at: <http://www.warwickshire.gov.uk/sfra>

Works proposed to main rivers, functional flood plains or within 9m of the landward toe of the channel: Any proposed works affecting statutory main rivers or within the indicative floodplain or within the byelaw distance requires the prior written consent of the Environment Agency under the relevant statutory legislation and current land drainage byelaws. Please contact the Environment Agency Partnerships and Strategic Overview team if further information is required.

Surface water drainage

The Neighbourhood Plan is essentially placed to play a vital role in managing surface water runoff and reducing the risk of surface water flooding. This can be achieved through an understanding at a local level of existing surface water flooding issues and recommending action to alleviate or resolve these issues. The Neighbourhood Plan can then go further and actively promote sustainable methods of drainage that ensure surface water runoff does not increase as a result of new development.

It is strongly recommended that the Plan includes strong support for Sustainable Drainage Systems (SuDS). These can achieve multiple environmental benefits not only by reducing flood risk from surface water, but also in areas such as biodiversity, amenity and water quality.

Documents such as Ciria C697 (the SuDS Manual) and Part H of the Building Regulations 2000 can provide excellent reference points for determining a suitable working practice for surface water drainage considerations. It should be noted that any such recommendations within the Neighbourhood Plan must conform to and complement the requirements and aims of local planning policy, as well as the Lead Local Flood Authority's aims in respect of their role as SuDS Approval Body

Groundwater

NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

The majority of the Parishes are underlain by a variety of bedrock which is classified as a Principal Aquifer. Principal Aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. The use of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. In addition, parts of Stoneleigh lie within groundwater Source Protection Zone classification 3.

A number of historic landfill sites are located within the Parishes. These are:

- Home Farm, Kimberley Road, Baginton, Coventry, Warwickshire, which operated from 1979 to 1983 and was licensed to accept inert waste.
- Hall Drive, Baginton (our records show that no further information is available)
- Rowley Road, Baginton, which operated from 1961 until 1970 and accepted household waste and liquid sludge. Gas control measures have been taken at some point during the sites lifetime.
- Coventry Airport, Baginton, which operated from 1974 until 1989 and accepted, inert, commercial and household waste as well as liquid sludge
- Rock Farm, Baginton, Coventry, which operated from 1940 until 1991 and accepted inert, industrial and special (hazardous) waste as well as liquid sludge
- Disused Gravel Pits, A445, Bubbenhall, Ryton on Dunsmore, Warwickshire which operated from 1978 to 1993 and accepted inert, industrial, commercial, household and special (hazardous) waste as well as liquid sludge

We are able to provide further advice on protecting groundwater, including guidance on the use of SuDS.

We recommend that developers:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.

3. Refer to the Severn River Basin Management Plan (currently out for consultation).
4. Refer to our website at www.environment-agency.gov.uk for more information.

We would like to refer the enquirer to our groundwater policies in Groundwater Protection: Principles and Practice (GP3), available from our website. This sets out our position for a wide range of activities and developments including:

- . Waste management
- . Discharge of liquid effluents
- . Land contamination
- . Ground source heat pumps
- . Cemetery developments
- . Drainage

Piling or any other foundation designs / investigation boreholes / tunnel shafts / ground source heating and cooling systems using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

Waste

The waste hierarchy – reduce, re-use, recycle – should be implemented when developing proposals within the Parish. Community composting schemes and the necessary waste handling facilities could be developed as part of the essential infrastructure within the Parish.

The Neighbourhood Plan should be based on a robust long term vision and a clear enough structure for development and change to help make it happen even with changes in political and economic conditions. We look forward to engagement with the Parish to tackle issues and achieve exemplar development wherever possible.

We cannot over-emphasise the importance of early pre-application discussions on all proposals to ensure that any initial issues can be resolved and subsequent planning applications can run smoothly. As sites or more detailed area plans come forward, we will provide more detailed comments. Early liaison will achieve our aim of ensuring that schemes are enabled in a joined up way and avoid issues arising unexpectedly at advanced stages in the process.

Climate Change

We now have a role to provide advice and support to businesses, public sector and other organisations to help them adapt to changing climates. Our aim is to help key sectors increase their resilience to climate risks and we are working closely with Defra as part of Climate Ready – the Government's national programme for adaptation, to help achieve this. It is therefore hoped that the Neighbourhood Plan in this area would encourage development that would address climate change. We would welcome the opportunity to provide any early pre-application advice on future development.

Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. We have appended this to the letter for useful advice.

Please note that this advice is given in good faith on the basis of the information supplied at the time of writing. This advice is given without prejudice to matters that may arise from further information, consultation or examination and is therefore not binding on any formal consultation reply or decision that may be made by the Environment Agency.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Mr Martin Ross
Planning Advisor

Direct dial 01543 405047

Direct e-mail martin.ross@environment-agency.gov.uk