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Dave Barber - Policy and Projects Manager  
Warwick District Council  
Riverside House,  
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21st July 2017

Dear Dave,

### **Response to the pre-submission draft of the Baginton and Bubbenhall Neighbourhood Plan**

I refer to the above consultation on the pre- submission of the Baginton Neighbourhood Plan. The plan sets out a vision for the future of the area and planning policies to be used to help make decisions on planning applications within the Town Council area.

The County Council welcomes communities proposing the submission of Neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment.

### **Financial implications of Neighbourhood Plans**

We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans. Therefore, Neighbourhood Plans should not identify capital or revenue schemes that rely on funding from the Council. However, we will assist communities in delivering infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.

We have the following comments on the pre-submission consultation to the Neighbourhood Plan:

### **Housing mix matters**

The Plan seems to be silent on the issue of housing for the vulnerable citizens of the town. The NP is an ideal opportunity to promote the inclusion of housing suitable for older people and younger adults with disabilities.

## **Comments on transport matters:**

### **Road safety**

Should the Neighbourhood Plan contain proposals that require any changes to the highway i.e. speed limits, traffic calming measures etc. these will need to meet the relevant criteria and be subject to consultation. In addition, funding to achieve these should be provided by the proposed development.

Warwickshire County Council generally supports the emphasis that has been placed on increasing public footpaths and cycle routes. We recommend that projects, such as, car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.

### **Transportation matters**

The County Council supports the objectives, policies and projects contained within the draft neighbourhood plan.

Warwickshire would recommend that projects such as car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.

Our specific comments on the Plan are as follows:

### **Policy G4 Traffic Management and transport Improvements**

Whilst the County Council supports new developments providing new or improved sustainable travel, traffic calming measures or pedestrian improvements. Any associated improvements to access to the highway will be subject to detail consultation with the Highway Authority. This includes any impact to existing road networks or introducing new or increasing existing public and community transport.

The County Council supports new developments providing adequate amounts of parking as set out in the Local Transport Plan (2011-2026) and the parking standards as set by Warwick District Council's Supplementary Planning Document: Vehicle Parking Standards.

### **Policy G5 Additional Business Premises and Employment Opportunities**

The County Council supports the proposals contained in the Neighbourhood Plan, in principle, subject to both planning and transport planning criteria being met. This includes any impact to existing road networks or the addition of parking. Parking standards are set by the District Council and contained in the Supplementary Planning Document: Vehicle Parking Standards.

### **Policy BAG1 & BAG2**

The County Council supports the emphasis given to cycling and walking. Walking and cycling opportunities should also be identified in new developments.

### **Policy BAG5 Protecting Local Services, Assets and Amenities**

The County Council supports the proposals under Policy BAG5 in principle, subject to both planning and transport planning criteria being met.

As stated, parking standards are set by Warwick District Council's Supplementary Planning Document: Vehicle Parking Standards and therefore the amount of provision that new sites will be required to provide are subject to those rules and regulations.

### **Policy BAG6 Traffic Management and Transport Improvements**

The County Council supports improvements to public transport in the area.

We note that there is a goal of developing a comprehensive long term plan for managing road safety. The County would require further information on this before commenting further. We would require further detail information regarding aspirations for the provision of additional pavements and increasing the widths of pavements in the area before commenting further.

### **Policy BUB3 Provision and Protection of Facilities and Services**

Further details would be required regarding the accessibility of individual sites before commenting further.

### **Flood risk matters**

The County Council as the Lead Local Flood Authority (LLFA) has the following comments to make:

### **Policy G1: Protecting and Enhancing Local Landscape Character**

We are supportive of the points made in 4.12 – 4.14 and G1 in relation to flood risk. For example:

Wetlands conservation and enhancement; which has the potential to increase flood storage during heavy rainfall events, potentially reducing flood risk to communities further down the catchment.

Maintaining and replanting hedgerows can be particularly beneficial when hedgerows are parallel to surface water runoff paths can act to slow down flows and reduce soil erosion.

### **Protecting green spaces in policies BAG4 and BAG5**

#### **Policy G6: Managing flood risk**

We are support all three points in G6, and recommend an additional point is included on the use of appropriate SUDs in all new developments. In brief, the LLFA requires the use of above ground SUDs designed in accordance with CIRIA 753 SUDs manual, providing attenuation to greenfield runoff rates. Requirements set out in the following guidance should also be adhered to:

The National Planning Policy Framework Paragraphs 030 - 032 of the Planning Practice Guidance (PPG).

Defra's Non-statutory technical standards for sustainable drainage systems

WCC Flood Risk and Drainage Planning Advice further details can be found on our web pages here: <http://www.warwickshire.gov.uk/floodpreappadvice>

### **Housing allocations**

Part of allocation H08 is situated within flood zone 2 as identified by the Environment Agency. According to the Environment Agencies' Updated Flood Map for Surface

Water, there is also currently a high risk of surface water flooding to the site. Careful consideration of how this pluvial flood risk is reduced and managed through development will be required in consultation with LLFA. Pre-application advice should be sought.

It is strongly recommended that a point is added to BAG2 to reflect the points made in the above 2 sections, whilst BAG1 and BUB2 could include a point on the need for suitable above ground SUDs providing attenuation to greenfield runoff rates.

### **Public Health matters**

To provide guidance for communities Public Health Warwickshire has produced guidelines for communities preparing Neighbourhood Plans. Please also find attached our Neighbourhood Development Planning for Health document. The document contains evidence and guidance for promoting healthy, active communities through the neighbourhood planning process. The document can be found on the following link: <https://apps.warwickshire.gov.uk/api/documents/WCCC-630-656>

Alongside this, Public Health England's [local health tool](#) can be used to understand the health needs of the population the population of Stratford Town.

Should the Town Council wish to discuss the guidance document or the local health tool further please contact Gemma McKinnon on E mail address; [gemma.mckinnon@warwickshire.gov.uk](mailto:gemma.mckinnon@warwickshire.gov.uk).

Should you wish to discuss or require further information on any of the above matters please let me know?

Yours sincerely,

Jasbir Kaur  
Strategic Planning and Development Manager

*Working for  
Warwickshire*