

Warwick District Council
PO Box 2178
Leamington Spa
Warwickshire
CV32 5QH

Our ref: UT/2007/101229/OT-
01/SB1-L01

Your ref: hs/Baginton and
Bubbenhall NP

Date: 02 November 2016

Dear Sir/Madam

SEA SCREENING OPINION FOR THE BAGINTON AND BUBBENHALL JOINT NEIGHBOURHOOD PLAN

Thank you for your consultation letter of 12th October 2016.

Environment Agency position

We have reviewed the Strategic Environmental Assessment Screening Report submitted and have further comments to make in respect of Groundwater and flood risk to ensure that the Neighbourhood Plan will appropriately address the environmental issues we consider are of most importance for this proposal.

Our technical comments detailing the information we consider should be provided in the screening report are provided below.

Flood Risk

The following two allocated housing sites are located within the NDP Area:

H19 Baginton – Land north of Roswood Farm: The site is located in Flood Zone 1 (low risk) as shown on our Flood Map for Planning (Rivers and Sea).

H08 green field site: The River Sowe flows through the southern boundary of the site and is located partly within Flood Zone 2 (medium risk). You may wish to consider including a Policy to ensure that all development is located outside of the River Sowe floodplain.

The NDP (section 2.15) recognises that the NDP area is at risk of flooding from the Main Rivers Sowe and Avon and the surface water drains are at capacity in Bubbenhall. However, the Plan does not propose any Policies to safeguard land at risk from fluvial flooding and the provision of sustainable management of surface water from both allocated (H08) and future windfall sites to ensure that sites are safe and will not increase flood risk elsewhere and that opportunities to reduce flood risk are identified.

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
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We recommend that a flood risk management Policy is included in the NDP to cover these aspects and take into account the impacts of climate change. This should support the strategic development needs as set out in Warwickshire District Council's Local Plan. In particular with regard to Policy FW1 (Development in Areas at Risk of Flooding) and Policy FW2 (Sustainable Urban Drainage) of the emerging Local Plan. Consideration should be given to the following measures to protect and enhance the river corridors of River Sowe and River Avon which are located in the NDP Area.

This should consider the inclusion of the following mitigation measures:

- Ensure all development is located outside of flood risk areas
- Opportunities to reduce flood risk elsewhere by allocating flood storage areas
- Setting back development 8m from watercourses to allow access for maintenance and restoring the natural floodplain
- Ensure SuDS all required on all developments and all SuDS features must be located outside of the 1 in 100 year plus climate change flood extent
- Open up culverted watercourses and remove unnecessary obstructions

We recommend that Warwickshire County Council, as the Lead Local Flood Authority, are consulted on this Plan. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water.

Baginton and Bubbenhall Joint Neighbourhood Plan Strategic Environmental Assessment Screening Opinion (October 2016)

The SEA Screening Opinion concludes that the NDP does not require a full SEA to be undertaken. We agree with the conclusion as the NDP is not allocating any new sites for development and is unlikely to have significant environmental effects (allocated sites are not located in high flood risk area) that have not already been dealt with through a sustainability appraisal of the Local Plan for the area.

Groundwater

We have the following comments to make which relate solely to the protection of 'Controlled Waters' receptors.

The 'Baginton and Bubbenhall Draft Neighbourhood Development Plan 2011 – 2029' (September 2016) does not include maps of specific potential development areas so we are unable to provide any site specific comments.

In planning any development reference should be made to our 'Groundwater Protection: Principles and Practice' (GP3) document. This sets out our position on a wide range of activities and developments, including:

- Storage of pollutants and hazardous substances
- Solid waste management
- Discharge of liquid effluents into the ground (including site drainage)
- Management of groundwater resources
- Land contamination
- Ground source heat pumps
- Cemetery developments

The comments we set out above are without prejudice to future decisions we make

regarding any applications subsequently made to us for our permits or consents for operations at the site.

Yours sincerely

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