

## Sophie Leaning

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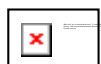
**From:** Juliet Carter [REDACTED]  
**Sent:** 28 October 2018 20:04  
**To:** Neighbourhoodplans  
**Subject:** Brandon & Bretford Neighbourhood Development Plan

Dear Sirs

The Joint Burial Committee of Wolston Parish Council wishes to endorse the response made by Wolston Parish council on the Brandon & Bretford Neighbourhood Development Plan.

Yours faithfully

Juliet A Carter (Mrs)  
Clerk to the Joint Burial Committee of Wolston Parish Council



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## Sophie Leaning

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**From:** McLaughlin, Anne-Marie M [REDACTED]  
**Sent:** 31 October 2018 14:42  
**To:** Neighbourhoodplans  
**Subject:** Brandon and Bretford Neighbourhood Plan  
**Attachments:** dps1.pdf

Good afternoon,

Apologies for the delay, please find attached our response which we hope will still be considered.

If you have any queries do not hesitate to contact me.

Kind regards,

Anne-Marie

**Anne-Marie McLaughlin**

**Planning Advisor – Sustainable Places | West Midlands Area**

**Environment Agency | Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR**

[REDACTED]

**Incident management standby role:** Incident Support Officer



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Victoria Chapman  
Rugby Borough Council  
Development Control  
PO Box 16  
Rugby  
Warwickshire  
CV21 2LA

**Our ref:** UT/2007/101479/AP-  
04/SB1-L01  
**Your ref:** Brandon and Bretford  
**Date:** 30 October 2018

Dear Madam

### **Brandon and Bretford Neighbourhood Plan Submission (Regulation 16)**

Thank you for referring the above listed document to the Environment Agency for comment. Having reviewed the information submitted we wish to raise the following points.

#### **FLOOD RISK**

We have reviewed the draft plan with regard to main river flood risk and in our strategic role and have the following comments. The River Avon and its tributaries flow within the Neighbourhood Plan Boundary. The Wolston Brook comes into confluence with the River Avon at the centre of the southern plan boundary.

The Neighbourhood Plan Policies should be consistent with the policies in the NPPF and seek to reinforce and enhance the policies in the emerging Rugby Borough Council Local Plan 2011 to 2031. In particular, we consider the following policies should be considered:

- Policy SDC5: Flood Risk Management
- Policy SDC6: Sustainable Urban Drainage
- Policy SDC7: Protection of the Water Environment and Water Supply

We welcome the inclusion of Policy INF 4 Drainage and Flooding however we recommend that this policy is expanded to safeguard land at risk from fluvial flooding as well as the provision of sustainable management of surface water from both allocated and future windfall sites. We have the following specific comments on the below proposed policy:

#### Policy INF 4

1. We recommend that the first sentence is expanded on and includes the following sentence 'The River Avon floodplain must be maintained and, where

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Cont/d..

opportunities arise, restored in order to maximise natural storage of flood water, reduce flooding problems and increase landscape, ecological and conservation value’.

2. We recommend that the second point should build upon the requirements of Policy SDC6. All developments should seek to control and discharge all surface water runoff generated on site during the 1 in 100 year plus climate change rainfall event. For Greenfield development sites, the surface water runoff generated as a result of the development should not exceed the Greenfield runoff rate. For Brownfield development sites, developers are expected to deliver a substantial reduction in the existing runoff rate, and where possible, reduce the runoff to the equivalent Greenfield rate.
3. We recommend that the NDP defines a “no build zone” either side of the River Avon and its tributaries extending at least 8m from the top of bank and incorporating the 1 in 100 year plus climate change extent. This should be used for open space and offer the opportunity to create multifunctional flood storage areas and ensure access for maintenance of the watercourses is maintained in the future.
4. Consideration should also be given to opening up culverted watercourses and removing unnecessary obstructions to reduce flood risk within the NDP area.

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.

We have recently updated our guidance for Neighbourhood Planning Groups on the gov.uk website: <https://www.gov.uk/guidance/consulting-on-neighbourhood-plans-and-development-orders> which provides information on when to consult the Environment Agency.

## **BIODIVERSITY**

The Environment Agency is generally in support of the policies / proposals outlined in the Plan regarding biodiversity along with the protection of local green spaces and nature conservation sites. We have the following specific comments on the below proposed policy:

### Policy CON 2

1. We recommend this policy is expanded to include support for proposals that seek to provide linkages between SSSI, LWS and ancient woodland within the Brandon and Bretford and surrounding neighbourhoods.

## **GROUNDWATER & CONTAMINATION**

We have the following comments to make which relate solely to the protection of ‘Controlled Waters’ receptors. We do not consider that the plan is likely to have significant impacts on ‘Controlled Waters’ receptors.

In planning any development in this area 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

Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that *'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'*. Consequently should a development site currently or formerly have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any Planning Application must be supported by a Preliminary Risk Assessment. This should demonstrate that the risks posed to 'Controlled Waters' by any contamination are understood by the applicant and can be safely managed.

We recommend that the risk management framework provided in the document 'Model Procedures for the Management of Land Contamination' (CLR11) is followed, when dealing with land affected by contamination.

According to information held by the Environment Agency there are several historic landfill sites within the neighbourhood plan area. We recommend that the local council, as lead regulator for these sites, are contacted for further information. The potential to mobilise any existing contamination during the proposed development of these sites should be considered.

If you have any queries contact me on the details below.

Yours faithfully

**Ms Anne-Marie McLaughlin**  
**Planning Advisor**

