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Long Itchington Parish Council
The Community Centre
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Our ref: UT/2007/101490/OR-
11/IS1-L01
Your ref:
Date: 02 November 2020

Dear Madam

Long Itchington Neighbourhood Development Plan (Draft Consultaton)

Thank you for referring the above Neighbourhood Development Plan (NDP) draft submission for comment which was received on 06 October 2020. We are broadly in support of the aims and objectives and wish to make the following comments:

The NDP policies should be consistent with the policies in the NPPF and seek to reinforce and enhance the policies in Stratford on Avon District Council's adopted Core Strategy 2011 to 2031 and the draft Development Requirements SPD, Part V: Climate Change Adaption and Mitigation. In particular, we consider the following policies should be considered:

- Policy CS.2 (Climate Change and Sustainable Construction)
- Policy CS.4 (Water Environment and Flood Risk)
- Policy CS.7 (Green Infrastructure)

We have the following comments on the NDP and the proposed Policies;

The River Itchen is classified as a Main River and runs through the NDP area as well as to the East of Long Itchington. There is flood risk associated with this watercourse, as shown on the Flood Map for Planning (Rivers and Sea) and many properties located along the river corridor are highlighted as being at risk of flooding. There are also flood defences within Long Itchington which provide a level of protection to properties to the East of the watercourse.

It should be recognised that even in defended areas there will always still be a degree of residual risk if flood defences are overtopped or breached by a flood event greater than that for which the defences are designed. As climate change increases the frequency and severity of flooding this brings increased maintenance requirements of maintaining watercourses and flood defences. As a result, we strongly recommend incorporating wording within the NDP and Policy NE4 to ensure essential maintenance access is provided to the River Itchen and for the existing flood defences.

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The NDP currently contains a policy for 'Flooding and Water Management (Policy NE4)' however we recommend that this could be further strengthened and developed further to take into consideration existing flood risk within the town and the opportunities to reduce flood risk through new development and/or safeguarding land for future flood risk management purposes. Any new development should have a positive effect on flood risk and the conveyance of water throughout the channel. Opportunities to reduce flood risk should be explored in all new development proposals and ensure designs are appropriately flood resistant and resilient.

Section 4 – Vision Statement

Whilst we support the inclusion of 'Enhancing and protecting the natural environment', this could be strengthened to make reference to River Itchen running through the NDP area. There are opportunities through new development to ensure existing flood defences are maintained effectively, as well as opportunities to further reduce flood risk through Natural Flood Risk Management interventions or other engineered solutions.

The theme 'the Natural and Built Environment' in paragraph 4.2 should discuss blue and green infrastructure in more detail and the wider benefits of making space for water.

Section 5 - Neighbourhood Plan Policies

The 'Summary Statement - Supported New Housing Development' on page 15 should include a sentence to ensure all new development is located within Flood Zone 1 and where ever possible contribute to reducing flood risk, as well as ensuring flood risk is not increased. There should also be consideration for climate change in relation to flood risk. This is particularly prominent as Stratford-on-Avon District Council declared a Climate Emergency in July 2020.

Policy EB3 & Policy EB4

These policies refer to change of use applications and should ensure all applications are in line with planning policy and should consider the inclusion of an additional point for 'the proposals would not conflict with any other policies in the Plan' as used in Policy H4.

Paragraph 5.4. The Natural Environment

Consideration of an additional Policy relating to 'Blue and Green Infrastructure' should be given within the Natural Environment section.

We recommend emphasis on blue-green corridors as they provide multiple benefits to areas including services such as flood management provision, green space, cooling local temperatures, ecological function and some amenity. All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure.

Consequently they then need to be afforded a high level of protection from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This could be integrated with the 8m easement requirement as discussed in Policy NE4 comments below.

If green spaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential in relation to the impacts of climate change. This can also be incorporated into the surface water management of future development sites.

Policy NE4 – Flooding and Water Management

The River Itchen corridor is a natural feature running through the NDP area and needs to be fully considered within this and other policies of the NDP building upon the requirements of Policy CS.4 in the Core Strategy. We would recommend strengthening the policy wording so that not only will new development not be at flood risk or increase flood risk, but that the existing flood defences will not be negatively impacted by any future development and wherever possible improved or enhanced.

There is no mention within the policy regarding appropriate easements needed for the existing flood defence and watercourse. We would strongly recommend that the NDP defines a “no build zone” or easement either side of the River Itchen extending at least 8m from the top of bank and incorporating the 1 in 100 year plus climate change extent. This easement should also extend at least 8m from the toe of any flood defence structure. This will create open space and offer the opportunity to create multifunctional flood storage areas and ensure access for maintenance of both the watercourse and flood defences is maintained in the future. Without this requirement included within this policy there is a risk that encroachment onto the watercourse and/or flood defences may occur which will have a detrimental impact on the space available for water during a flood event and maintenance access.

Consideration should be given to re-wording the second paragraph starting ‘*any proposal that has and adverse impact...*’ so that it is clearer. We support the principle however may suggest simplifying the wording similar to - ‘*Any proposal that will have an adverse impact on the effectiveness of the existing flood defences along the River Itchen will not be supported.*’

The policy should also include detail and reference to what works could be undertaken to further reduce flood risk in the Long Itchington NDP area. Through new development, opportunities to hold back water as well as Natural Flood Management interventions which can slow, hold back and de-synchronise the flow of water within the River Itchen catchment could be considered. Such measures could include the creation of swales, offline holding ponds and leaky dams to divert water runoff, combined with strategic tree planting and other measures to enhance soil permeability.

The policy should also include detail and reference to any works which could be undertaken to reduce flood risk to Long Itchington. Warwickshire County Council are promoting a scheme on the next FCERM capital programme (from 2021 – 2027) to reduce flood risk to properties in Long Itchington. Currently, within that scheme, there are opportunities to install Property Flood Resilience measures to reduce the risk of surface water flooding. We would advise contacting Warwickshire County Council for further information regarding this scheme.

There is no mention of Climate Change within this policy or another specific policy solely for climate change. We would welcome inclusion of a climate change policy within the NDP due to the Climate Emergency declared in July 2020. Reference to the Development Requirements SPD, Part V: Climate Change Adaption and Mitigation should be made.

We note the Water Framework Directive (WFD) has been mentioned in the evidence base for this policy. The River Itchen (conf R Stowe to conf R Leam - GB109054044110) is classified as having ‘Moderate Ecological Status or Potential’ and under the WFD there is a requirement for all waterbodies to meet ‘Good Ecological Status or Potential’ by 2027. The policy could be strengthened to secure water quality improvements where possible and align with Stratford-on-Avon District Council’s Core

Strategy 2011 to 2031, in particular Policy CS.4 Water Environment and Flood Risk. Reference to this may be more suited under **Policy NE5 – Environmental Pollution**.

Finally, we would strongly recommend that this policy includes wording around the use of silts or voids within development proposals. The use of stilts and/or voids to mitigate the impacts of flooding and climate change is not appropriate. Areas under stilts/within voids are often used as storage spaces and have the potential to become blocked during flood events which will have a cumulative impact in terms of flood risk. Therefore, we recommend including wording within the NDP policy to discourage the use of stilts and/or voids in the design of developments at risk of flooding.

Further Recommendations

We recommend that Warwickshire County Council as the Lead Local Flood Authority are consulted on this NDP. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water. However, in our Strategic Overview role we would welcome and support the introduction of green streets, rain gardens and swales (SuD's) to reduce surface water run-off, improve water quality and improve local amenity value.

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

Yours sincerely

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