

Long Itchington Parish Council Submission to SAP Consultation December 2020

Introduction

Long Itchington Parish Council has strong reservations about all three sites within the parish which are currently included in the SAP.

We welcome Policy SAP 3 which aims to release reserve sites in a specific order, thus protecting category 1 LSVs like Long Itchington from any further large or medium scale development, **but we reject the need for Local Service Villages to be allocated any Reserve Sites at all.** LSVs are supposed under Core Strategy Policy CS16 to accept approximately 2,000 homes. There are already up to 2,300 permissions granted across the four categories of LSVs and in some cases, notably Long Itchington, permissions greatly exceed the appropriate figure for the village. There is no justification, therefore, to have reserve sites in LSVs as they would, when called upon, cause even further excess above Policy CS16 limits. This policy of Reserve sites leads to land banking by developers and the degrading of the land in question.

We also question the need to provide self-build plots grouped together on one land parcel. Most people interested in self-building will buy plots specifically for their one house. Most plots become available through acquiring infill sites or those that become available through windfall or redeveloped sites within existing settlements. It is undesirable to allocate greenfield land for such houses when they can be accommodated within settlements. Policy SAP5 from the now-withdrawn 2019 version of the SAP provided for normal windfall/infill provision. **Therefore, we object to proposals SCB1 to SCB11, seeing them as unjustified.**

We have concerns that because self-builds may come on stream soon we will be facing another significant development outside the BUAB in the next couple of years. We recognise the challenge in engaging with new residents and want to ensure that we have done as much as possible to help the integration of significant numbers of new residents before receiving further numbers into the community.

We have serious concerns that our primary school will soon be too full for parish children. The changed status for Southam College, which has prompted a changed SAP response does not alleviate the fast-approaching over-full primary school in Long Itchington. Two of the year groups at the primary school are already at capacity. Being able to send your children to your village primary school is fundamental to helping new families integrate successfully.

We welcome strategic objective 7. which asserts the importance you place on biodiversity in the District. We do note, however, that **no reference is made to climate change in your strategic objectives** and we see this as a serious omission. We understand that Stratford District Council declared a Climate Emergency in July 2019, its aim to **be a carbon neutral district by 2030.** This is to be applauded but we would contend that other aspects of your planning activities

(including this SAP) do not support the general thrust of your climate change policies.

We note that all three proposed sites for Long Itchington are outside the agreed BUAB (built up area boundary). **We have grave concerns that this sets a precedent for further development and undermines the purpose of the BUAB.** We would like to see written justification for these sites to be outside the BUAB for our parish and the evidence upon which rests their inclusion.

SITE ALLOCATIONS WITHIN LONG ITCHINGTON

Introduction

We explore here Long Itchington Parish Council's evidence case for the removal of Site SCB.5 (land to the north of Collingham Lane, Long Itchington, known locally as "Ruby's Meadow") as a proposed site within the Site Allocations Plan (SAP) for self-build plots and our case for the removal of site LONG.A (east of Marton Road). We also raise serious concerns regarding site LONG.B (Leamington Road)

Long Itchington Parish Council (LIPC) is fully supportive of Stratford District Council's Core Strategy and acknowledges that the allocation of reserved sites across the district is prudent to ensure the 5-year housing land supply is maintained. Long Itchington has experienced a significant level of recent house building with 289 dwellings either built or under construction since 2016. This is over 250% above the allocation of 113 dwellings stated within the Core Strategy as a maximum for each of the Category 1 Local Service Villages (LSVs) over the entire lifetime of the plan.

SITE SCB.5 – Ruby's Meadow – off Collingham lane

LIPC considers that SITE SCB.5 is completely unsuitable for housing development of any kind. It is outside the BUAB.

Ruby's Meadow is a small sloping area with a spring-fed stream running through the centre of the site. The stream is bordered by willow trees and the whole site provides a biodiverse habitat for a wide range of wildlife. The meadow has not been ploughed or cultivated within living memory and contains remnants of ancient "ridge and furrow" field system. The sections below set out the case (with evidence) explaining why it is essential that this site must be removed as a site for development of any kind.

Local Knowledge

LIPC has been regularly advised in the past that "local knowledge" is helpful (and sometimes vital) in reaching decisions on planning matters. However, such local knowledge is also frequently discounted on the grounds that it cannot be supported by empirical data. It is inevitable that such information is often difficult to substantiate, however, this does not mean that it should be disregarded. Local knowledge is frequently derived from years of observation and experience and is

built upon collective local “wisdom”. Indeed, LIPC have been invited to present such wisdom to SDC:

In purely practical terms, it would be extremely useful if the District Council and its partners can be made aware of any local issues or requirements that may affect the delivery of the two reserve sites ('LONG.A' and 'LONG.B') identified in the emerging SAP

Two recent examples can be used to illustrate the importance of local knowledge. First, when the Marton Road (Bloor Homes) development was proposed, local knowledge of the ground and soil conditions suggested this site was unsuitable for development. When construction commenced the ground conditions proved to be complex; the builder realised that piling would be necessary before the houses could be built. There was also the need to raise the levels of the land on the site to create a gradient for surface water. This has resulted in the dwellings being considerably higher than originally intended. This has resulted in the dwellings being considerably higher than originally intended. In addition, the consequences of these building works resulted in significant flooding which was much worse than had ever been experienced before in areas adjacent to the site, on neighbouring properties' land.

Second, when the Spinney Fields development was approved, local knowledge of the drainage and sewage systems suggested that without the construction of a new sewer the existing infrastructure would struggle to cope. For the last four years Long Itchington has experienced a continuous succession of foul water overflows as a result of the connection of the Spinney Fields development to the village sewage system. Four years later Severn Trent, whilst acknowledging the problem, have still not resolved the issue for residents

It is therefore essential that any references in this report to “local knowledge” are not simply dismissed as speculation or as being unsubstantiated by evidence – they do represent meaningful evidence and must be given due weight.

The evidence for the removal of SCB.5 presented is divided into two broad types:

- First, specific written evidence that can be referenced through a variety of documents and reports. These documents have not been attached as appendices; however, specific links and references have been included. LIPC is happy to provide any documents that may be required.
- Second, relevant information and knowledge provided to the parish council by local residents. All references to information from residents and local sources can be substantiated and should not be discounted or dismissed as speculation. If there is doubt regarding any reference made within this report LIPC will provide the supporting detail behind it.

The case for the removal of Site SCB.5 is set out under six headings; general lack of suitability, flooding and flood risk, biodiversity and wildlife, road traffic and safety, sewage/foul water overflows and climate change.

1. General unsuitability of the site for development

In 2015 Stratford District Council, in preparation of its response to the Gladman Appeal (Land to the East of Southam Rd, Long Itchington, for up to 100 dwellings, planning reference 15/00562/OUT), commissioned a landscape sensitivity report from Alison Frost, a Landscape Officer employed in the Planning Department. In her report for the Appeal ref: 15/00562/OUT (page 15, para 5.20 ([Stratford-on-Avon District Council: Eplanning](#))) Ms Frost highlighted that

“It [the Gladman site] is separated from the existing built edge on the north side of Collingham Lane by the small pasture with stream, mature willow trees as well as remnant ridge and furrow (this field is specifically mentioned in the LCP sensitivity text as to be avoided)”

The LCP sensitivity text reference is taken from the Stratford District Landscape Sensitivity Study undertaken by Whites Consultants on behalf of the District Council in 2012 and can be found on the SDC website. And at www.longitchington.org.uk. The relevant reference can be found on page B419 of the study and states;

“There may be opportunities south of the industrial estate but avoiding the pasture with willows....”

It is therefore clear that two different studies commissioned by Stratford District Council Planning department both highlight that Site SCB.5 unsuitable for development. LIPC consider this is compelling evidence to support the view that this site is unsuitable and should be withdrawn from the SAP and replaced by a suitable alternative site. If this evidence was valued enough to form a major part of the District’s case at Appeal, then its credibility cannot now be ignored.

2. Flooding and Flood Risk

LIPC has a number of concerns regarding flooding on this site and is aware that a Level 2 flood risk assessment has now been commissioned by Stratford District Council.

The Environment Agency surface flooding map (see appendix) shows an area of high-risk surface flooding running down through the site. This area broadly follows the line of the existing stream. LIPC considers that the level of flood risk on the site makes it entirely unsuitable for building. The sites of any dwellings erected would have to be sited well away from the flood risk areas and would significantly compromise both the layout and the aesthetics of the site. Suitable SUDS (e.g. abatement ponds) would need to be substantial and their construction and positioning would further compromise the viability of the site.

LIPC is particularly concerned that the building of even a small number of properties on this site will significantly increase the risk of run-off flooding to existing properties. There are nine existing dwellings sited “down-stream” of the site at Southam Road and LIPC consider that the impermeable “foot print” of just 12 additional houses will significantly contribute to the volumes of run-off water flowing down towards existing dwellings. The construction of any dwellings on the site will also significantly reduce

the capacity of the ground to absorb rainfall thus further increasing the risk of run-off flooding.

In their response to our emerging Neighbourhood Plan, the Environment Agency has stated the following:

“Any new development should have a positive effect on flood risk and the conveyance of water throughout the channel”

*“The NP should state that....all new development is located within Flood Zone 1 and wherever possible contribute to reducing flood risk, **as well as ensuring flood risk is not increased.**”*

In March 2016 one of the properties located directly below the site was inundated by run-off flood water flowing down from the site. In November 2019 a heavy rainfall event resulted in a “near miss” inundation of a property as the stream running down from the meadow rose at a significant rate. At 3.00am on the morning of 10 November 2019 two residents (including a parish councillor) witnessed the water level rise to within inches of flooding into at least one property before rapidly receding again. Any building on this site (even with the installation of a SUDS system) will significantly increase the flooding risk to existing properties. The impact of climate change is projected to result in more frequent and more intense heavy rainfall events thereby increasing further the risk of run-off flooding.

LIPC has been advised that the stream running down through the site is spring fed from a number of springs located further up the Debdale slope. The general soil structure within the area of the site is comprised of layers of Lias clay. It is locally observed that the springs in and around the site regularly migrate depending on rainfall patterns and levels within the water table. For example, one area was known to have been completely dry for several years when (after a period of sustained significant rainfall) a spring appeared and fed into the stream system for several months. This spring subsequently dried up and yet did not reappear during the very wet winter of 2019/20. The nature of the soil/ground structure of the area, including the proposed self-build site, is clearly hydrologically unstable and unsuitable for the building of dwellings.

3. Sewage/Foul water overflows

Stratford District Council Planning department is aware of the ongoing sewage overflow problems that have been experienced on Stockton Road, Southam Road and Church Road. These issues all result from an error made by Severn Trent. In their asset plan they identified the existing storm drain running down Stockton Road as a foul sewer. Consequently, the foul sewage of the new development (150 houses) was connected to the storm drain which is causing ongoing issues.

The sewage overflows from both the drain covers in the highway and drain covers located in residents' properties were first experienced in 2017. Continuous discussions have been held with Severn Trent in an attempt to get the problems resolved. However, despite repeated site visits and various remedial works being carried out the overflows continue to occur.

On 6 November 2019 LIPC held a multi-agency meeting involving Severn Trent, the Environment Agency, WCC Highways, and WCC Flood Risk team. Stratford District Council Planning (Ms Tracy Humphries) also attended the meeting and can verify that the parish council specifically request that no further planning applications for any new dwellings should be approved until it could be clearly demonstrated that the sewage overflow problems had been fully resolved.

Further works were carried out by Severn Trent during the first half of 2020. On Sunday 16 August 2020 a heavy rainfall event resulted in sewage overflows from the foul system at a number of locations. The sewer cover at the junction of Collingham Lane and Stockton Road was forced off and the fire brigade had to attend due to the significant hazard this caused.

In September 2020 LIPC wrote to the CEO of Severn Trent insisting that action be taken to resolve these problems. Stratford District Council Planning department have been provided with copies of both the letter and accompanying reports.

Location, topography and gravity all dictate that the foul water from any dwellings built on Site SCB.5 will have to discharge into the Stockton Road/Southam Road sewer. It can be clearly demonstrated that the existing foul system is still regularly overloading and Severn Trent have struggled for several years to identify and implement an effective solution. While options continue to be explored LIPC has been given no assurances from Severn Trent that the situation will be resolved in the near future.

LIPC considers it would be irresponsible to approve any further housing that would discharge foul waste into a sewage system that is clearly overloaded, a solution for which is far from being identified and implemented. The ongoing sewage overflows represent a threat to public health and result in the discharge of effluent into residents' gardens, into the public highway and into the river Itchen. In December 2020 there was a serious outbreak of norovirus at the Primary School at the same time as raw sewage was evidenced in the roads around the school following a day's heavy rain. This has been reported to Environmental Health.

LIPC consider this situation provides a powerful argument in its own right for the removal of Site SCB.5 as a site for the potential building of further housing. Asking the developer of this site to provide remedial works may be superficially attractive, but not an adequate solution as some of the problems emanate from much further up the Stockton Road. Furthermore, the cost of an effective solution is extremely high.

It is a very serious issue.

4. Biodiversity and Wildlife

Site SCB.5 comprises a small pasture meadow with a stream bordered by mature willow trees running through the centre. The site contains remnants of ancient "ridge and furrow" field system. A local resident born in the village and aged over 80 has confirmed that the meadow has not been ploughed or cultivated during his life-time.

Site SCB.5 has therefore remained undisturbed by modern intensive agricultural methods and as a result harbours a rich diversity of wildlife.

The Parish Wildlife Warden confirms the following fauna has been recorded by local residents: Tree Sparrow, Goldcrest, Dunnock, Robin, Kestrel Fieldfare, Song Thrush, Mistle Thrush, Wood Pidgeon, Goldfinch Bullfinch, Barn Owl, Pipistrelle Bat, Badgers, Field Mouse, Field Vole, Fox, Rabbit. Evidence of Hedgehogs has been observed, although no actual sightings have been recorded.

The ecological survey of the adjacent fields conducted in 2014 observed that the small pond (located just outside the site to the north) was identified as excellent habitat for Great Crested Newts, although none were observed. Since that survey Great Crested Newts have been recorded in properties on Collingham Lane (to the East of the site), and in one property on Southam Road (directly bordering on the site to the South).

The Warwickshire Biological Records Centre (WBRC) were commissioned to undertake a study within the village during 2020. This would have included Site SCB.5 but unfortunately due to the Covid-19 pandemic the survey was unable to take place. A desktop study has now been completed – the findings are referenced in the Appendix. LIPC have commissioned WBRC to undertake a specific study in 2021 to register and record the flora and fauna within the meadow. (It is understood that although Stratford District Council has undertaken some ecological assessments of sites identified within the SAP, this site has not been the subject of a survey).

Although no formal study has yet been undertaken, the flora within the meadow is certainly far more diverse than that within the surrounding agricultural landscape. The principle that “absence of evidence is not evidence of absence” particularly applies to this site. The reason that no official record of diverse flora is available is not because the flora is absent, but because no detailed study has been made.

Circumstantial evidence provides a strong indication that this site is highly biodiverse and is an extremely valuable site for wildlife. The list of bird species recorded to be nesting in and around the site includes raptors such as kestrels and barn owls. As “apex predators” these species rely on a good supply of small mammals for food. In turn, these small mammals are part of a complex and diverse food-chain. Bats are recorded to be roosting in and around the site (particularly in the willow trees) and this provides strong evidence of a good food supply of insects – which in turn rely on a diverse range of flora.

The fact that the meadow has been undisturbed and uncultivated for decades (possibly centuries), together with the species that have been recorded locally, provides a strong indicator of a highly diverse ecosystem. The Parish Wildlife Warden assesses that the site is unusual in that it has not been subject to cultivation or modern agricultural methods and advises that with thoughtful management the site could quickly become a significant wildlife habitat. LIPC is committed to working with the landowners and a range of agencies (e.g. Warwickshire Wildlife Trust) to protect the site and develop it into a significant wildlife habitat.

Finally, it must be highlighted that the construction of dwellings on this site will result in storm water being discharged into the existing stream which ultimately feeds into the River Itchen. This will be the case even if the water is first channelled into an abatement pond system. Any storm water will include traces of vehicle tyre, oil and other residues washed off from drives and roadways constructed on the site. Although minimal in quantity, such pollutants will cause a level of contamination to a currently pristine site.

The Water Framework Directive (WFD) classifies the River Itchen (conf R Stowe to conf R Leam - GB109054044110) 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. Increased contaminated run-off flooding which ultimately discharges into the River Itchen will compromise any improvement in its status.

5. Road traffic and safety

LIPC note that WCC Highways have not registered an objection to the inclusion of Site SCB.5 within the SAP. However, LIPC also note that the WCC Highways response appears confined to addressing frontage access onto the site but makes no mention of either traffic volumes or the impact of additional traffic joining the junctions between Collingham Lane and Stockton Road, and also the junction between Stockton Road and the A423.

LIPC would draw attention to the submissions made by WCC Highways in 2015 in respect of application 15/00562/OUT and suggest that many of the issues highlighted in the submission from Mr Simms are still highly relevant. LIPC request that WCC Highways be asked to reassess the impact of the development of Site SCB.5 in the wider context of the Collingham Lane/Stockton Road junction and the Stockton Road/A423 junction in light of the increase in traffic volumes that have resulted from the two large housing developments on Stockton Road comprising over 200 new houses.

Several residents have approached LIPC to register concerns regarding road safety issues at the junction between Collingham Lane and Stockton Road. Pedestrians crossing Collingham Lane to proceed on up Stockton Road towards the school have stated that visibility up Collingham Lane is very poor. Pedestrians have to step out into the roadway to see around the corner.

The visibility for vehicles turning right out of Collingham Lane towards the A423 is extremely poor and many vehicles turning left off the A423 onto Stockton Road (using the short "slip road") do so at speed either ignoring, or being unaware of, the "blind" junction with Collingham Lane. There have been two reported incidents at the junction within the last three months, one involving a vehicle and one "near miss" with a cyclist. There is a constant stream of anecdotal reports of incidents and near misses at this junction. (LIPC encourage residents to report incidents to WCC Highways and to the police, unfortunately this does not always happen).

The additional 200+ new houses on the Spinney Fields and Keepers Meadow housing developments has added considerably to the traffic volumes (particularly at

peak times, e.g. the school run) and this causes increased queuing at the junction between Stockton Road and the A423. At least 415 extra vehicles now use Stockton Road as a result of these two developments.

In addition to increases in vehicle numbers there has also been an increase in pedestrian activity, again at peak times, using Stockton Road. Parents are increasingly (and rightly) encouraged to walk their children to school and this, together with over 50 new homes on the Marton Road Farm development has increased pedestrian movements proceeding up Stockton Road to the school – with the need to cross Collingham Lane. This is supposed to be a safe route to school. No traffic surveys or assessments appear to have been conducted prior to the inclusion of Site SCB.5 as a proposed self-build site. LIPC believes that in the light of the assessment made by WCC Highways in 2015, **a traffic survey is essential before Site SCB.5 is included within the SAP**. A survey will clearly demonstrate that the addition of 12+ new self-build homes on Site SCB.5 will result in a not insignificant number of additional vehicles feeding into a junction that is already congested and dangerous at peak times.

LIPC would draw attention to a number of points highlighted by WCC Highways in their 2015 assessment. For the reasons stated above, traffic volumes have significantly increased since this assessment was made;

“Site observations already note that existing motorists edging out of the exit, pulling out in small gaps, and drivers spinning their wheels to exit the junction. This latter has led to the white lines which demark the give way markings have been scrubbed by the vehicles, suggesting motorists exit the junction with considerable acceleration.” (WCC Highways letter 2 September 2015)

“The Highway Authority is concerned that the additional delay created at this junction will exacerbate this issue further, with drivers becoming impatient and taking further risks when exiting the junctions therefore increasing the instances of poor driver behaviour as observed through the site observations. This raises the potential for more accidents to occur at this location and would impact upon the safe operation of the Highway at this location.” (WCC Highways letter 2 September 2015)

“The applicants (Gladman) have proposed the sum of £20,000 for speed reduction measures, however, it is unclear how these could be implemented at this time and whether they would have the desired effect on reducing vehicle speeds. Therefore, the Highway Authority would require to see a drawn-up plan and supporting Road safety Audit. More fundamentally though the proposals would not address the additional delay which would in turn lead to motorists taking greater risks when exiting the junction....” (WCC Highways additional response to application 15/00562, September 2015)

In the light of these significant concerns raised by WCC Highways in 2015, LIPC would expect full traffic surveys and a Road Safety Audit to be conducted prior to the inclusion of Site SCB.5 as a site for development of any kind.

6. Climate Change considerations

On 15 July 2019 Stratford District Council formally declared a climate emergency and specifically pledged to take action to mitigate the impact of climate change. SDC has made a pledge:

“A pledge to take local action to contribute to national carbon neutral targets through the development of policies and practices” (SDC)

LIPC would suggest that in line with the SDC policy on climate change, carbon impact should be a factor in the allocation of **all** development sites. We would therefore draw your attention to the following issues and highlight that the development of a site that has remained undisturbed for decades is likely to result in a larger carbon footprint than other more suitable sites. **LIPC would expect the SDC to produce a Carbon Impact Assessment for all sites to ensure alignment with its overarching climate change policy.**

LULUCF

Land-use change can either sequester carbon or release it into the atmosphere. Developing wild pasture and forest (for example Ruby’s Meadow) will release CO₂, whilst building on a brownfield site would have negligible impact. LIPC would like to know details of the assessment process for assessing sites with regard to their impact upon Climate Change and reducing the areas LULUCF footprint. LIPC would draw attention to Stratford District Council’s recent poor performance on LULUCF in a report for the government released earlier this year (Malcolm et al. 2020). LIPC would also enquire what steps are being taken to reduce the impact from LULUCF and the development of a policy that aligns the Planning Authority with the stated aims of the Committee on Climate Change report published earlier this year (CCC 2020).

Flooding

Given that there is no plan for the nations of the world to reach net zero emissions prior to 2050 the concentration of man-made CO₂ in the atmosphere will continue to rise into the second half of the current century. When the effects of time-lag and climate feedback loops are included, there is the strong indication that flooding will continue to worsen to 2100. Given this information the government has prepared estimates of the possible extent to which flooding will worsen over the course of this century to be used in the planning process. Assessments highlight the possibility that peak river flow within our area could increase by 90% and peak rainfall intensity by 40% (Environment Agency 2020) within the lifetime of any properties being built. As highlighted in the section on flooding, LIPC would request SDC pay particular attention to local knowledge with regard to any areas experiencing flooding. Ruby’s Meadow is a particular case in point.

Conclusion

Long Itchington Parish Council believe there is a compelling case for the removal of Site SCB.5 from the SAP as a site for self-build housing – or indeed housing development of any kind. It is essential that this site is protected and enhanced as a dedicated wildlife habitat.

Reserve Sites

Both reserve sites are outside the BUAB (built up are boundary). This is inappropriate and potentially damaging to our rural environment.

We assert that no LSVs should be allocated reserve sites.

SITE LONG.A – OFF MARTON ROAD – Reserve Site

We have specific reasons why this particular site is unsuitable for development: ground conditions and risk of flooding, climate change considerations and unsuitable use of green field to produce an inappropriate and large housing estate in a rural community.

The case for the removal of Site LONG.A is set out under four headings

1. Ground conditions and risks of flooding

The main argument supporting removal of this land parcel relies on evidence of unsuitable ground conditions and flooding risk

The Environment Agency has suggested in response to the emerging Neighbourhood Plan that:

“All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure” blue-green corridors 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

When the Bloor Homes development was granted approval for 58 houses in 2016 the decision rested upon evidence from various agencies, one of which is the WCC Flood team, whose initial assessment was against the development but changed to approval on presentation of a potential solution to flooding by the applicant. This did not solve the issue. Local residents and the Parish Council continued to assert that flooding was and would continue to be a serious issue. This was discounted at the planning stage, but when building commenced Bloor Homes realised that they had to find a drastic solution and there then followed a period of quite extensive piling.

There was also the need to raise the levels of the land on the site to create a gradient for surface water. This has resulted in the dwellings being considerably higher than originally intended. The consequences of these building works resulted in significant flooding which was much worse than had been experienced before in areas adjacent to the site.

In December 2020 residents’ gardens on the recently built Bloor estate on Marton Road itself are almost permanently waterlogged and are flooded after heavy rain which demonstrates that the issue has not been resolved.

In 2019 long-standing homes just south of the Bloor estate experienced serious and unprecedented flooding

We believe that the proposed reserve site LONG A. to the side of the Bloor development would also present serious flooding issues and water-logging of land and gardens which are not easily remedied.

2. Climate Change Considerations

The arguments on this above in relation to SITE SCB.5 also apply for the Marton Road site, LONG A.

There is a strong possibility that peak river flow within our area could increase by 90% and peak rainfall intensity by 40% (Environment Agency 2020) within the lifetime of any properties being built. As highlighted in the section on flooding, LIPC would request SDC pay particular attention to local knowledge with regard to any areas experiencing minor flooding, site LONG A being one such site. Increased run off into (ultimately) the River Itchen will increase flood risk further downstream, as well as compromising water quality (reference Water Framework Directive)

3. Additional housing in this location creates one large unsuitable housing estate next to a recently built plot of 58 houses

Large housing estates are not appropriate in villages, but the addition of eighteen houses directly adjacent to Lilac View would effectively create an estate of 76 homes.

4. Traffic

More homes will mean more cars. Multiple (more than two) car households are becoming increasingly common here due to more adult children living with their parents and the paucity of effective public transport. There will be increased traffic - especially at peak times - onto an already busy road which, despite the recent addition of a crossing refuge, is difficult for pedestrians to cross to access the centre of the village. Traffic through the village has already increased due to the diversions in place caused by the construction of HS2 and speeding is an ongoing issue.

SITE LONG.B Concerns – Land next to Russell Close off Leamington Road

1. Evidence of ancient well in the corner of the site

We expect, but have seen no evidence of, a full topographical study to ascertain features on this site which may render it unsuitable for development.

2. Confusion regarding access

The SAP document is not clear about what access is suggested for this site. We would question the appropriateness of accessing the site through Russell Close, as this would be very damaging for current residents and would remove the current cul de sac layout.

3. The site is close to the conservation area and close to valued landscapes as identified in the emerging Neighbourhood Plan.

Whilst acknowledging the need for communities to grow organically over time, we reject the notion that this site would both be a suitable place and be necessary before 2031. It would completely change the aspect of that area of the village and could encourage further erosion of the BUAB.

APPENDICES

1) Flood Risk map showing extent of flooding from surface water running through site SCB.5



2) Evidence of local flooding (NB: we can provide numerous other pieces of evidence)



Flooding at properties next to Lilac View (Marton Road) after building completed.



Flooding in garden of house, Southam Road at back of site SCB.5



Sewage overflow in vicinity of SCB.5



Sewer cover forced off Collingham Lane, August 2020

Document/Link List

- SDC Climate Change Update document September 2019
[Climate Change Update - September 2019 \(longitchington.org.uk\)](https://www.longitchington.org.uk/Climate-Change-Update-September-2019)
- Alison Frost report from the Gladman application Ref: 15/00562/OUT
[Alison-Frost-Appeal-statement-Gladman-Development-2015.pdf \(longitchington.org.uk\)](https://www.longitchington.org.uk/Alison-Frost-Appeal-statement-Gladman-Development-2015.pdf)
- Stratford Landscape Sensitivity Study 2012 by Whites Consultants –
[2011 LSA: A -Background, Method and Summaries - Landscape Sensitivity Study \(longitchington.org.uk\)](https://www.longitchington.org.uk/2011-LSA-A-Background-Method-and-Summaries-Landscape-Sensitivity-Study)
- EA Surface Flood Risk Map - see appendix above
- Water framework Directive: The Water Environment (Water Framework Directive) (England and Wales) Regulations
- Severn Trent Documents

[Letter-to-Liv-Garfield-Sept-2020-1.pdf \(longitchington.org.uk\)](https://www.longitchington.org.uk/Letter-to-Liv-Garfield-Sept-2020-1.pdf)

[Sewage-Summary-Severn-Trent.pdf \(longitchington.org.uk\)](https://www.longitchington.org.uk/Sewage-Summary-Severn-Trent.pdf)

[Sewage-Chronology-of-events.pdf \(longitchington.org.uk\)](https://www.longitchington.org.uk/Sewage-Chronology-of-events.pdf)

- Warwickshire Biological Records Centre (WBRC) survey reports

To be found at www.longitchington.org.uk

- Highways references - WCC Highways letter of September 2015 re: Gladman application. On SDC website. Ref: 15/00562/OUT.

[Ben-Simms-Letter-WCC-Highways.pdf \(longitchington.org.uk\)](https://www.longitchington.org.uk/Ben-Simms-Letter-WCC-Highways.pdf)

[Ben-Simm-Email.pdf \(longitchington.org.uk\)](https://www.longitchington.org.uk/Ben-Simm-Email.pdf)

- Climate Change references

CCC (2020) *Land Use: Policies for a Net Zero UK*. London: Committee on Climate Change.

Available at: <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

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[EA-Response-to-NP.pdf \(longitchington.org.uk\)](#)