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**Our ref:** UT/2007/101479/AP-  
03/IS1-L01  
**Your ref:** WOL/NA/CONSULT1  
**Date:** 14 October 2015

Dear Sir/Madam

### **Wolston Neighborhood Area Application**

Thank you for referring the above application which was received on 21 September 2015.

The Environment Agency have the following comments to make regarding the Wolston Neighbourhood Area designation.

#### **FLOOD RISK**

Parts of the area within the proposed Wolston Neighbourhood Area are located within Flood Zones 2 and 3, defined by Table 1: Flood Zones, paragraph 065 of the Planning Practice Guidance as having a medium and high probability of flooding respectively. The risk of flooding comes from the Wolston Brook and the Upper Avon, which are both designated as 'Main Rivers'.

We have recently completed hydraulic modelling of the Wolston Brook as part of the Rugby hazard modelling study. The modelling report (which is awaiting final sign off) states the following with regards to Wolston Brook:

'The channel flowing through Wolston is confined and limited in capacity in several areas. Modelling results show that the channel contains the 1 in 10-year flood event however for larger flood events out of bank flooding occurs, particularly in the vicinity of Brook Street. Here water spills out of bank upstream of the bridge impacting several properties on both banks. In more extreme flood events (such as the 1 in 1000-year flood event) extensive flooding will occur along the whole channel corridor as a result of the historic development of the channel floodplain.'

There are a number of structures on Wolston Brook through Wolston village which are causing a restriction to the flow. As part of any development proposals, we recommend that the following principles are applied:

- Development should be set-back from watercourses (culverted or otherwise) with an indicative easement of 8m to allow for maintenance access
- Take every opportunity, where development lies adjacent to the river corridors, or their tributaries or the functional floodplain, to benefit the river by reinstating a natural, sinuous river channel where the channel has become over-engineered and restoring the functional floodplain within the valley where it has been lost previously
- Open up culverted watercourses where feasible
- Culverting of existing open watercourses will not be supported
- Every opportunity should be taken to reduce flood risk overall

We also recommend that you consult the Lead Local Flood Authority for the area for all matters regarding surface water and ordinary watercourses.

## **BIODIVERSITY**

Discussions between the Parish Council and the Environment Agency have previously taken place concerning ways to re-naturalise parts of the artificial, brick lined Wolston Brook. Whilst the preferred option would be to remove significant sections of the artificial channel, an alternative option would be to identify areas upstream where water could be held back, additional habitat created and water quality improvements made. The Neighbourhood Plan should therefore support this approach in identifying and investigating suitable upstream sites and encouraging development proposals to consider opportunities to help achieve this. This approach would be supported by the Environment Agency through its 'Working with Natural Processes' in order to address downstream flooding.

## **GROUNDWATER & CONTAMINATION**

Geology: The Wolston area of Rugby Borough is predominantly underlain by solid geology of the Mercia Mudstone Group and the Rugby Limestone Member.

Superficial deposits: In terms of superficial deposits, these comprise of River terrace deposits and alluvium in the northern, western and north eastern area. The central, southern and south eastern portions of the site comprise the Wolston Clay and Dunsmore Sands and Gravels.

Groundwater Vulnerability: There is no classified principal aquifer within the Wolston area, however there are large parts of the area classified as secondary A and B aquifer. Secondary aquifers can be important for supporting local abstractions and supplying base flow to rivers.

Aquifers are important in terms of supplying base flow to local rivers, streams and wetlands. Controlled Waters (groundwater and surface water) must therefore be afforded a high degree of protection in the area.

Licensed Abstractions: There are 3 licensed abstractions within the Wolston area, two of which are surface water abstractions and the remaining one is sourced from groundwater.

Source Protection Zones: There are no groundwater source protection zones within the designated site area.

Landfills: There are 2 currently licensed landfill sites within this area and 6 historic landfill sites.

Watercourses: The Upper Avon and Wolston Brook are located within the site

boundary.

General comments:

- New developments must not deteriorate the quality of surrounding watercourses as a result of increase in foul sewage. Any constructions for surface and foul drainage systems are expected to be constructed to British Standard Codes of Practice. It should be demonstrated that any drainage systems serving the development have sufficient capacity to accommodate the additional flows, generated as a result of the development, without causing pollution.
- Any development should follow the procedures set out in the National Planning Policy Framework (NPPF) and in CLR11 – Model Procedures for the Management of Contamination. This would include assessing the suitability of sites for redevelopment based on their environmental setting as well as previous site history and potential for contamination to be present and the best ways to mitigate any risks to Controlled Waters shown. We encourage the development of contaminated land sites through the planning regime, but request that a good awareness of these issues be demonstrated prior to planning permission being sought for any particular site. Adequate site investigations should be carried out in order to characterize the sites appropriately. Subject to the results of any investigations conducted, remediation may be required where there are issues of concern to groundwater and surrounding land.
- NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).
- Every stage of the development plan should meet the legislation laid out in the Environment Agency's Groundwater Protection: Policy and Practice (GP3), (available at <http://www.environment-agency.gov.uk/research/library/publications/144346.aspx>). The document highlights numerous topics and sets out the legislation and our own advice on them, for example in terms of brownfield regeneration, cemeteries, quarries, sewage works, groundwater flooding, sustainable drainage, waste storage, fuel storage, groundwater resources, agricultural disposals, ground source heat pumps etc. It is essential that those principles are adhered to where relevant when it comes to detailed proposals being produced.

Yours faithfully

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