

02 October 2023

Our ref: Nuneaton and Bedworth 9

Dear Sir/Madam,

Nuneaton and Bedworth Borough Council Borough Plan Review Publication Draft Plan – Regulation 19 Consultation 2021-2039.

Thank you for the opportunity to comment on your consultation, we have some specific comments to make on your plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

Strategic Policy DS1 – Sustainable Development

We are supportive of this policy, especially inclusion of the water efficiency target and SuDS.

Strategic Policy DS4 – Residential allocations

We have undertaken a high-level assessment of the residential allocations. Sites where there are likely to be impacts upon sewerage capacity are discussed below. Within Nuneaton there is an existing strategic growth scheme seeking to provide capacity for growth in the north-east of the catchment. In addition, it is expected that a phase 2 of this scheme will be promoted to address strategic growth risks from other sites within the Nuneaton – Hartshill WwTW catchment in due course.

Strategic Housing Allocation	Site Name	Approximate Dwellings	Sewerage Capacity Comment	Risk Status
SHA1	Top Farm	1,700	There is an existing promoted capital scheme to address growth risks from this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined sewer.	High
SHA2	Arbury	1,525	Site will drain to St Mary's Road Terminal Pumping Station. It is likely that a capital scheme will be required to accommodate the cumulative growth in Nuneaton. It will be important that surface water is managed sustainably and not discharged into the foul/combined sewer.	Medium
SHA3	Tuttle Hill	350	Site will drain to St Mary's Road Terminal Pumping Station. It is likely that a capital scheme will be required to accommodate the cumulative growth in Nuneaton. It will be important that surface water is managed sustainably and not discharged into the foul/combined sewer.	Medium
SHA4	Hospital Lane	445	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low
SHA5	West of Bulkington	348	There are some risks in the downstream network which may require improvement. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Medium
SHA6	Hawkesbury Golf Course (remaining land)	176	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low
Adjacent to SEA6	Bowling Green Lane	150	There are no known network constraints downstream of this site. It will be important that	Low

			surface water is managed sustainably and not discharged into the foul/combined system.	
Adjacent to SEA2	Wilson's Lane	75	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low

Strategic Policy DS5 – Employment allocations

We have undertaken a high-level assessment of the employment allocations. Sites where there are likely to be impacts upon sewerage capacity are discussed below. Within Nuneaton there is an existing strategic growth scheme seeking to provide capacity for growth in the north-east of the catchment. In addition, it is expected that a phase 2 of this scheme will be promoted to address strategic growth risks from other sites within the Nuneaton – Hartshill WwTW catchment in due course.

Strategic Housing Allocation	Site Name	Size (ha)	Sewerage Capacity Comment	RAG Status
SEA2	Wilson's Lane	19.09	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low
SEA3	Prologis Extension	3.58	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low
SEA4	Coventry Road, Nuneaton	9.59	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low
SEA6	Bowling Green Lane	19.89	There are no known network constraints downstream of this site. It will be important that surface water is managed sustainably and not discharged into the foul/combined system.	Low

Strategic Policy SA1 – Development principles on strategic sites

We are supportive of this policy, particularly ensuring that BREEAM standards are applied for non-residential buildings, policy wording on blue-green infrastructure and protection of

watercourses and drainage ditches. We are supportive of the encouragement of green roofs to manage surface water sustainably as well as the water efficiency target inclusion.

Strategic Policy DSHA1 – Land at Top Farm, North of Nuneaton

We would like to note that bullet 21 'Contribution to local sewage network improvements to improve biological treatment capacity to accommodate the development', would be made through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SHA2 - Arbury

We would like to note that bullet 12 'Contribution to local sewage network improvements to increase capacity, improvement to the local network to reduce impact on hydraulic performance and improve biological treatment capacity to accommodate the development', would be made through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SHA4 – Hospital Lane

We would like to note that bullet 13 'Local sewage network improvements to improve capacity to accommodate the development' would be made by Severn Trent funded through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SHA5 – West of Bulkington

Regarding point 12 following detailed site assessment we will advise whether local sewerage network improvements are required to provide capacity.

Strategic Policy SHA6 – Land at former Hawkesbury Golf Course

We would like to note that bullet 12 'Contributions to local sewage network improvements to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.' would be made by Severn Trent funded through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SEA2 – Wilsons Lane

We would like to note that bullet 10 'Potential local sewage network improvements in order to improve capacity to accommodate the development, subject to discussions with Severn Trent Water,' would be made by Severn Trent and funded through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SEA3 – Prologis Extension

We would like to note that bullet 11 'Suitable sewage connection to the existing foul drainage network and contributions to increase capacity to the treatment works to support growth.,' would be made by Severn Trent and funded through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SEA4 – Coventry Road

We would like to note that bullet 8 'Suitable sewage connection to the existing foul drainage network and contributions to local sewage network, improvements to increase capacity, improvement to the local network to reduce impact on hydraulic performance and improve biological treatment capacity to accommodate the development,' would be made by Severn Trent and funded through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Strategic Policy SEA6 – Bowling Green Lane

We would like to note that bullet 7 'Suitable sewage connection to the existing foul drainage network and contributions to increase capacity to the treatment works to support growth.,' would be made by Severn Trent and funded through developer infrastructure connection charges, and we are not expecting additional financial contributions. More information on our developer infrastructure charges can be found [here](#). We do expect contribution through adhering to approved design standards, meeting the water efficiency target of 110l/person/day and managing surface water sustainably by following the drainage hierarchy.

Policy HS1 – Ensuring the delivery of infrastructure

We are supportive of this policy in that developers are recommended to get in touch with us at an early stage in planning to ensure infrastructure can be provided in a timely manner.

Policy NE1 – Green and blue infrastructure

We are supportive of this policy and recognise that new blue green infrastructure and protection of existing is important in planning for a future concerning the impact of climate change.

Policy NE2 – Open space and playing fields

We are supportive of this policy, especially the wording regarding multi-functional uses of open spaces as flood storage.

Policy NE4 – Managing flood risk and water quality

We are supportive of this policy, particularly ensuring that new developments make space for water through blue-green infrastructure, SuDS and ensuring that the drainage hierarchy is followed to restrict connection of surface water into the foul/combined sewer.

Policy BE3 – Sustainable design and construction

We are supportive of this policy, especially reference to Water Efficiency targets.

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we have produced a Drainage and Wastewater Management Plan (DWMP) covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan supports future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks. More information on our DWMP can be found on our website <https://www.severntrent.com/about-us/our-plans/drainage-wastewater-management-plan/>.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive

12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2021) paragraph 174 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”*

Green Open Spaces Policy

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology.

Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Supporting Text:

National Planning Policy Framework (July 2021) Paragraph 174 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by: ...

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;"

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text:

National Planning Policy Framework (July 2021) Paragraph 153 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to

contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

Rebecca McLean

Strategic Catchment Planner

GrowthDevelopment@severntrent.co.uk

Alison Osborne-Newbold

From: Rebecca McLean [REDACTED]
Sent: 02 October 2023 10:47
To: Planning Policy; Jacqueline Padbury
Subject: RE: Consultation notification - Publication version of Borough Plan Review and Main Modifications to Gypsy and Traveller Site Allocations DPD
Attachments: Nuneaton and Bedworth 9 Response.pdf

ST Classification: OFFICIAL PERSONAL

Hi Jacqui,

Thanks for the opportunity to comment on your Borough Plan Review, please find our response attached.

Best Wishes,

Rebecca McLean

Strategic Catchment Planner – Drainage and Wastewater Management Planning (DWMP)

Asset Strategy & Planning – Chief Engineer

Severn Trent



Severn Trent Centre, 2 St John's Street, Coventry, CV1 2LZ

Working together to get the best out of our assets

From: Planning Policy <planning.policy@nuneatonandbedworth.gov.uk>

Sent: 04 September 2023 08:58

To: Sarah Matile <[REDACTED]> Jacqueline Padbury

<[REDACTED]>

Subject: Consultation notification - Publication version of Borough Plan Review and Main Modifications to Gypsy and Traveller Site Allocations DPD

Caution: This is an external email originating outside Severn Trent. Think before you click on links or open attachments.

Dear Sir / Madam,

Nuneaton and Bedworth Borough Council will commence consultation today on the following planning policy documents:

Borough Plan Review Development Plan Document (DPD) – Publication version (Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012)

The Borough Plan Review sets out the strategy for the Borough for the plan period up to 2039. This is the final opportunity to have your say before the Plan is submitted to a Government Planning Inspector for independent examination. This is different from previous stages as it no longer seeks views on alternative options. This Regulation 19 consultation will require submissions to specifically focus on the following issues:

- Legal Compliance – does the plan meet the legal requirements made under various statutes?
- Duty to Cooperare – has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?
- Soundness – has the plan been positively prepared, justified, effective, and consistent with national policy?

Gypsy and Traveller Site Allocations Development Plan Document (DPD) – Main Modifications

The Gypsy and Traveller DPD plans to provide sufficient sites to meet the Gypsy, Traveller and Travelling Showpeople needs up to 2037. As part of the Examination process, amendments to the DPD have been agreed with the Inspector. ‘Main’ modifications are those recommended by the Inspector to make the DPD sound and legally compliant, and ‘additional’ modifications are those which do not materially affect the Policies in the DPD, but which are generally minor factual updates; corrections of any errors or which are considered necessary for clarity.

Taking part

The documents above will be subject to a 6 week public consultation. The consultation documents, supporting documents and response forms can be found on the Council’s website at www.nuneatonandbedworth.gov.uk/consult. Hard copies of the documents are also available for inspection at the following: Bedworth Library; Bulkington Community Library; Nuneaton Library and Nuneaton Town Hall, Coton Road, Nuneaton CV11 5AA.

To support the consultation, officers of the Council will be available to answer questions on the consultation at Nuneaton Town, Coton Road, Nuneaton, CV11 5AA on Monday to Friday between 10am and 2pm.

All responses should preferably be sent via email to planning.policy@nuneatonandbedworth.gov.uk or in writing to:

Planning Policy
Nuneaton and Bedworth Borough Council
Town Hall
Coton Road
Nuneaton
CV11 5AA

The consultation will run from the 4th September 2023 and all comments should be received by 11:59pm on **16th October 2023**.

If you require further information in relation to the consultation, please contact the Planning Policy team on 02476 37 6288.

Many thanks
Planning Policy Team



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