Written Statement for Nuneaton & Bedworth Borough Plan Review Matter 6 – Detailed Policies

Reference: J. Bigham Date: 30 August 2024

Issue: Whether the non-strategic detailed policies reflect the Plan's vision, strategic objectives and development strategy and accord with national policy and evidence?

Policy NE4 – Managing flood risk and water quality

In response to Q145, to be consistent it is necessary for the improvement of water quality to be referred to within all policies for allocations (strategic housing, non-strategic housing and employment). It is essential that each allocation is assessed regarding water quality and that site-specific requirements are included within policies/SPDs to ensure that Policy NE4 is complied with. However, although there are sections for 'flooding', there does not appear to be an equivalent for 'water quality'. This needs to be rectified. Where evidence of a connection with the Severn Estuary SAC/Ramsar or Humber Estuary SAC/Ramsar has been identified, this should also be referred to within a water quality section.

Where there are opportunities to reduce 'the impact of diffuse pollution from rural and urban sources' and/or 'improve and protect habitats', such as in the case of Strategic Policy SEA2 – Wilsons Lane (surface water run-off from M6/A444, intensive agriculture, sewage discharges by Corley Sewage Treatment Works and Sowe Meadow LWS), this should be referred to within the policy for the allocation.

Similarly, where there is an opportunity to remediate contaminated land, such as in the case of Strategic Policy SH6 Land at former Hawkesbury Golf Course, this should also be referred to.

Furthermore, the potential for impacts on water quality from the allocations themselves should be assessed, including the possibility of pollution events (fuel storage leak, warehouse fire, etc) and requirements for protective measures, such as the use of oil/petrol interceptors and silt traps, should be outlined where necessary.

Similarly, Strategic Policy SA1 (development principles on strategic sites) should also have its own section on water quality. The importance of slowing the flow of surface runoff to reduce the risk of sewer systems overflowing is also important to highlight within policies which reference water quality improvement.