
From: Darren Grant <darren.grant@nuneatonandbedworth.gov.uk>
Sent: 20 December 2024 09:02
To: lichfield@pegasusgroup.co.uk
Cc: Planning Folder New
Subject: Land at Harrow and Wapping Farm, Watling Street, Nuneaton - SRU 225027
Attachments: DGT08457.pdf

FAO Sarah Dauncey –

Dear Sarah

I hope you are well.

I attach my response to your request for an EIA Scoping Opinion to your Scoping Report. I have sent this as soon as it was ready, and because of this I am still waiting for some consultation responses. I will forward these over to you as and when they arrive and they may need to be read in conjunction with this letter.

I have copied in HBBC given the majority of the site rests within the HBBC boundary.

Merry Christmas and a happy New Year to you.

Kind regards

Darren

Darren Grant BA(Hons) MA MRTPI
Principal Planning Officer
T: 024 7637 6328
Follow us: @nbbccouncil

From 1st September 2024 we will be using our adopted [Local Validation Checklist](#) to validate all new planning applications, please follow the link to find out more prior to submitting an application.



DISCLAIMER The information contained in this e-mail is confidential and is intended for the recipient only. If you have received it in error, please notify us immediately by reply e-mail and then delete it from your system. Please do not copy it or use it for any other purposes, or disclose the content of the e-mail to any other person or store or copy the information in any medium. Email traffic may be subject to recording and/or monitoring in accordance with relevant legislation. The views contained in this e-mail are those of the author and not necessarily those of Nuneaton and Bedworth Borough Council. The information contained in this e-mail may be the subject of public disclosure under the Data Protection Act 1998, General Data Protection Regulations 2018, Freedom of Information Act 2000 or the Environmental Information Regulations 2004 - unless legally exempt from disclosure, the confidentiality of this e-mail and your reply cannot be guaranteed.

***** This e-mail has
been scanned for all viruses



Enquiries to: Darren Grant

Sarah Dauncey
Pegasus
Central House
Queen Street
WS13 6QD

Direct Dial: Contact Team (024) 7637 6328

Direct Email: planning@nuneatonandbedworth.gov.uk

Date: 20th December 2024

Our Ref: 225027

Your Ref:

Dear Ms. Dauncey,

Location: Land at Harrow and Wapping Farm - Watling Street, Nuneaton
Description: EIA Scoping Opinion

Thank you for your submission of the Environmental Impact Assessment (EIA) Scoping Report and the request for a formal scoping opinion. This response outlines our feedback on the proposed scope and assessment methodology provided in your report, as well as recommendations to ensure a thorough evaluation of the potential environmental effects associated with the project.

We have consulted with various stakeholders. Not all of these consultees have responded at the time of writing, but as they respond we will forward their comments over to you (which may then need to be read in conjunction with this response).

Summary of Proposed Scope and Topics

We have reviewed the Scoping Report and agree with its findings, including the helpful summary provided in Section 16, which summarises the anticipated environmental effects likely to arise from the proposed development. The scope includes a comprehensive range of topics, consistent with the EIA Regulations and based on an assessment of significance as set out in Schedule 4 (4).

The report appropriately identifies key areas where significant environmental effects are anticipated during both construction and operational phases, including ; Population, Human Health, Biodiversity, Land, Soil, Water, Air, Climate, Material Assets, Cultural Heritage, Landscape, and any interrelationship with, and between, these issues.

Environmental Statement (ES) Structure

We are in agreement with the proposed ES structure, which will consist of the following:

1. **Volume 1: Environmental Statement – Main Text**

- Sets out the findings of each of the environmental disciplines.
- 2. **Volume 2: Technical Appendices**
 - Providing supporting data in appendices will allow for in-depth examination of the findings presented in Volume 1.
- 3. **Non-Technical Summary**
 - This summary will be expected to provide accessibility for a broader audience, helping facilitate understanding of the environmental considerations by the public and other stakeholders.

Comments on Scoping of Topics

Scoped-In Topics

We support and welcome the inclusion of the topics mentioned in the Report including; Population, Air, Climate, Human Health, Land, Soil, Water, Landscape and would add the following comments on the other highlighted 'scoped-in' topics, given the potential for significant environmental effects:

Ecology

The conclusions provided show the chances for significant impacts on ecology, and ecological features both during construction and operation.

The construction phase is expected to directly impact habitats for protected species, particularly through the removal of hedgerows and ditches, which are critical ecological features. This habitat loss, combined with the removal of trees in hedgerows that may provide potential roosting sites for bats, will likely decrease the suitability of the area for various species. Additionally, increased lighting and human encroachment near woodland edges may further disrupt wildlife, particularly bats. Construction activities are also anticipated to disturb species through noise, light, and human activity. Furthermore, there is a risk of groundwater pollution and alterations to local hydrology, driven largely by the loss of wet ditches and intrusions into the riparian corridor.

During the operational phase, these impacts are expected to persist. Species will continue to face disturbances from ongoing noise, light, and human activity. Groundwater pollution and changes to hydrology, stemming from the loss of wet ditches and encroachment into riverine areas, remain concerns. Habitat suitability for protected species, particularly bats, is likely to be further compromised by continued lighting and encroachment along woodland edges. Together, these factors pose ongoing threats to the local ecological balance.

Mitigation of significant effects should be fully explored.

Heritage and Archaeology

Based on the conclusions presented, the assessment of significant effects on archaeology and built heritage is reasonable, but will likely require further investigation during the ES. Any potential archaeological findings during construction should be managed in accordance with best practices. The Built Heritage chapter of the ES will evaluate the impacts of the construction and operational phases of the proposal on the area, with particular reference to Watling Street and the Roman, Medieval and Post-Medieval periods.

Hydrology, Flood Risk, and Drainage

We recommend that the FRA comprehensively evaluates risks associated with minor watercourses on-site, and near to the site, along with measures to mitigate potential flood impacts during construction and operation. This assessment should include cumulative impacts on surrounding drainage systems, including the potential for impacts on established watercourses, streams and brooks. Therefore, it is recommended that Flood Risk, Drainage, and Water considerations be fully scoped into the ES as mentioned in the Report.

Noise and Vibration

Vibration effects during both construction and operational phases are acknowledged, and we advise a thorough evaluation of potential impacts on nearby sensitive receptors. The ES should outline specific mitigation strategies to manage noise and vibration impacts.

Transport and Access

A detailed transport assessment should consider cumulative effects of construction traffic, operational traffic, potential impacts on local infrastructure, and accessibility for surrounding communities. Traffic management and mitigation measures should be clearly outlined.

Air

Defra have issued some interim guidance to minimise exposure of PM_{2.5} and this now needs to be considered at the planning stage. Pending the publication of new DEFRA guidance, applicants shall aim to provide evidence that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM_{2.5} and its precursors as far as is reasonably practicable as per the UK Air Information Resource at <https://uk-air.defra.gov.uk/pm25targets/planning>

Socio-Economics

The assessment of socio-economic impacts should include potential disruption to local businesses, employment uses, major trunk roads and community services due to construction activities including footpaths, walking routes, open space and play, with mitigation measures for construction traffic, noise, and pollution impacts on the surrounding area.

Scoped-Out or Reduced Scope Topics

We agree with the exclusion or reduced scope of the topics listed in the report, based on the rationale that significant impacts are unlikely, with these short comments:

Contaminated Land

The site is understood to have been primarily agricultural land and therefore effects from detailed study is acceptable, given the absence of significant impacts. I am still to receive detailed comments from our Contaminated Land Officer though, and will forward these over as and when they arrive.

Lighting

Given that direct significant effects are not anticipated, the reduced scope is acceptable.

Climate Change and Greenhouse Gases

Given that direct significant effects are not anticipated, the reduced scope is acceptable. However, consideration of sustainable design and operational practices is encouraged to minimise greenhouse gas emissions.

Wind Microclimate

We support the scoping out of this topic as the potential for significant environmental effects is low.

Yours sincerely

D Grant

Darren Grant
Principal Planning Officer