

## North Warwickshire Local Plan Examination

### Position Statement to the Inspector's Matters, Issues and Questions (Phase 1 – Strategic Matters)

#### Matter 6 – Planning and Environmental Constraints

This Position Statement is made by Savills UK Ltd on behalf of our clients Cathedral Agricultural Partnership and the White Family. Our clients are major landowners within the draft H7 allocation: Land to the east of Polesworth and Dordon. This Position Statement is made in advance of verbal representations at the Examination in Public hearings.

**Q6.1: The vision for North Warwickshire in LP paragraph 4.6 includes respecting the rural character of the Borough. The NPPF 2012 sets out that planning should recognise the intrinsic character and beauty of the countryside and seek to protect valued landscapes. Is the North Warwickshire LCA report of August 2010 [CD7/1] an appropriate evidence base for establishing landscape character?**

**(a) Considered overall, would LP policies including LP14 'Landscape' achieve the LP vision of ensuring that rural character is maintained?**

**(b) Where are any specific areas of conflict between LP policies?**

Clarity is sought regarding the Inspector's reference to Local Plan paragraph 4.6, which does not appear to be numbered in the Submission Version of the Local Plan. The assumption has been made that the Inspector refers to the spatial vision in paragraph 4.2.

We consider the North Warwickshire Landscape Character Assessment (LCA) [CD7/1] to be appropriate evidence base for establishing landscape character, using a sound methodology.

Overall, it is considered Policy LP14 would achieve the Local Plan vision to maintain rural character. However, the policy does appear to place a blanket approach to the retention of existing trees, hedgerows and nature conservation features on all sites, which is overly restrictive. It is important to recognise that each development will have a range of site specific constraints and opportunities that will need to be addressed as part of bespoke proposals to bring development forward. The retention of trees, hedgerows and nature conservation features should therefore be considered on a site by site basis at the development proposals stage. Policy should seek to encourage rather than require retention of all such features.

**Q6.5: Is the LP based on robust evidence related to heritage, and does it set out an appropriate and positive strategy for the conservation and enjoyment of the historic environment including related to the canal system (chiefly policy LP15)? (see footnote 14)?**

We consider the Local Plan is based on robust heritage related evidence base, understood to include Historic Environment Assessments dated 2014 [CD8/11] and 2017 [CD8/12], along with the recently published Archaeology Assessment dated 2018 [CD8/21], as listed in Appendix C of the Local Plan. This is considered to represent an up to date evidence base.

With regards to whether the Local Plan, namely Policy LP15, sets out an appropriate and positive strategy for conservation, we consider the blanket requirement for Transport Assessments to include an assessment of how townscape and the historic environment has been assessed and addressed within development proposals to be unjustified. The heritage evidence base listed above makes no



reference to the need for transport assessments to take into account the historic environment. We consider the blanket requirement to be inappropriate as assessment of impact arising from transport proposals should only need assessing in circumstances where there are nearby heritage assets. A heritage assessment would be submitted with an application that has potential to impact on heritage assets in any case and such work should not need to be duplicated. As such we consider this requirement should be omitted from the policy.

**Q6.7: In addition to consideration of the HRA and SA in matters 2 and 4, is the approach in the LP, policies LP16, LP17, LP18 and LP19 in particular, to protecting and enhancing biodiversity justified and consistent with national policy? (see footnote 16)?**

Regarding Policy LP16 specifically, it provides clear guidance on how biodiversity offsetting will be dealt with, which is welcomed by our client. This aspect is consistent with NPPF paragraph 109 and the policy is considered to be effective in protecting and enhancing biodiversity.

**Q6.8: Is policy LP20, Green Spaces, appropriately justified and effective?**

Policy LP20 references the Green Space Strategy [CD6/8], which provides an up to date evidence base to back-up the policy and ensure compliance with NPPF paragraph 158. Although the Strategy identifies that developer contributions will be sought to develop a network of green corridors across the Borough, no figure appears to have been identified as to what contribution is expected from allocated sites, including allocation H7, towards the development of a green corridor network.