

Matter 10

**NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION STATEMENT
ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND – ID SLP360**

EXAMINATION HEARINGS, PHASE 2

Matter 10, Development Management Policies

Preamble

This Hearing Statement is made on behalf of our Client, the Church Commissioners for England, in advance of making verbal representations to Phase 2 of the Examination in Public into the North Warwickshire Local Plan.

Our Client is the majority landowner of 'Land to the east of Polesworth and Dordon' which has a draft allocation for housing under Policy H7. Accordingly, our Client is keen to engage in the Local Plan examination process and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

In this Statement we respond to Questions 10.9(b), 10.14(a), 10.14(d), 10.44(c) and 10.47. We do not have any specific comments to make in relation to the other Matter 10 Questions, but do nevertheless reserve the right to comment further in so far as it may affect our Client's land east of Polesworth and Dordon (Allocation H7).

Issues and questions

10.9 Policy LP2, Settlement Hierarchy

(b) for effectiveness, should LP2 contain a statement as to what is permissible within development boundaries?

1. The Proposals Map to the Local Plan confirms that Allocation H7 will form part of the development boundary. This approach is fully supported. However, there is a minor drafting error on the Proposals Map in which the development boundary does not appear to extend along the entirety of the allocation's eastern boundary. For the avoidance of doubt, it is considered that the Proposal's Map should be updated to include the whole of the eastern boundary.

2. Furthermore, as set out in our response to Matter 9, we object to the partial designation of Allocation H7 as Green Space/Open Space within the Proposals Map. Figure 1 of the Local Plan correctly identifies these parcels as a Local Wildlife Site and, as such, will be subject to the considerations of Policy LP16. Indeed, Green Space/Open Space is a separate land use designation and would lead to confusion as part of the design process. As such, it is recommended that the Proposals Map is amended as part of Allocation H7 to designate the areas of land marked green as Local Wildlife Sites.

10.14 Policy LP7, Housing development

(a) for effectiveness, should the evidence underpinning LP7 be referenced, for example in respect of demography or those registered with the Council in relation to the Self-build and Custom Housing Act 2015 (as amended)?

3. At Policy LP7 it is noted that the Council will require 5% of all plots on proposals for more than 100 dwellings to be self-build accommodation. For Allocation H7, this would equate to a total of 100 self-build dwellings.
4. On review of the Council's evidence base and supporting text to Policy LP7, the Council has provided no evidence to support such a significant number of self-build accommodation as part of Allocation H7. In the absence of robust justification for self-build accommodation specifically in Polesworth and Dordon, it is considered that the requirement for self-build accommodation as part of Allocation H7 should be deleted.

(d) What is the justification for requiring that certain types of housing are required only on sites exceeding 100 homes?

5. As set out above in our response to question 10.14(a), it is considered that the Council are not justified in their approach for requiring all schemes above 100 dwellings to provide 5% self-build accommodation. As such, it is considered that this requirement should be deleted from the Local Plan.

10.44 LP36, Parking

(c) Should all development be required to provide electric vehicle charging points (noting that policy LP38, Information and communication technologies contains a caveat that a connectivity statement need only apply where appropriate)?

6. Following the publishing of The Road to Zero: Next steps towards cleaner road transport and delivering out Industrial Strategy (July 2018), it is recognised that the Government has taken the decision that by 2040 no new diesel vehicles will be produced. By 2040, the Government also expects the majority of new cars and vans to be sold will be 100% zero emission. As such, we do not object to the principle of providing electric charging points as part of residential developments.
7. However, it may not always be practicable or viable to provide an electric charging point for every new dwelling – for example where on-plot parking is not provided. Policy LP36 should therefore clarify the instances in which an electrical charging point will be required.
8. Notwithstanding the above, the provision of a charging point is supported provided that it is a passive charging point (standard plug/socket).

10.47 Are monitoring arrangements sufficiently precise and measurable to enable effective review of the plan's effects?

9. As set out in our response to Matter 9, the inclusion of MM9 at paragraph 1.8 (Duty to Co-operate) of the Local Plan is generally supported as it will provide additional flexibility. However, it would be considered more effective if it was included as an individual policy rather than a supporting paragraph.