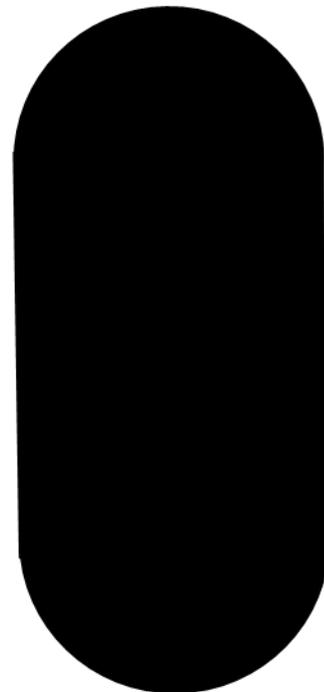
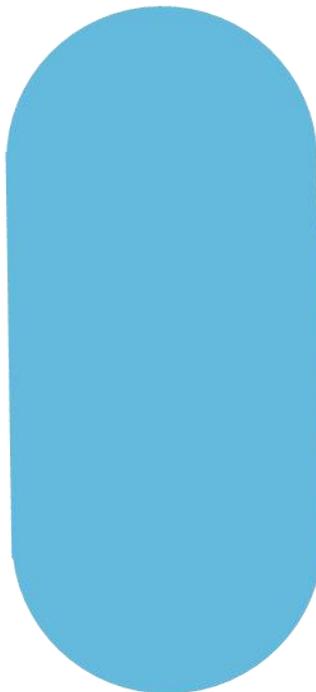


**WRITTEN STATEMENT IN RESPECT OF THE
CHARNWOOD LOCAL PLAN 2021-37
EXAMINATION**

**MATTER 3- CLIMATE CHANGE AND THE
NATURAL AND BUILT ENVIRONMENT**

On Behalf of Richborough Estates, the Bowler Family and William
Davis Ltd



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Richborough Estates and the Bowler Family, in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Charnwood Local Plan 2037.
- 1.2 Both Richborough Estates and William Davis have previously made representations to the Regulation 19 Local Plan consultation in respect of Policy DS3, site reference HA15.
- 1.3 Richborough Estates and the Bowler Family, William Davis Homes and the Council have agreed a Statement of Common Ground (SoCG) and we anticipate that the signed SoCG will form part of the Council's pack submitted to the examination (and so provision is not duplicated here).
- 1.4 The Statement of Common Ground (SoCG) confirms agreement between Charnwood Borough Council, Richborough Estates and the Bowler Family and William Davis Homes with respect to the following matters of interest to Matter 3:
- vii. The objectives of the requirements in Policy DS3(HA15) in relation to landscape and settlement identity are supported.
 - viii. The quantum of development and the illustrative drawing in the Pre-submission Draft Local Plan have been informed by technical exchanges between technical officers from the Council and the Promoters.
 - ix. The objectives of the requirements in Policy DS3(HA15) in relation to green infrastructure and biodiversity, and the mechanisms proposed for achieving them, are supported.
 - x. The objectives and requirements in Policy DS3(HA15) in relation to securing comprehensive and cohesive development of the Site are supported for the land under the control of the Promoters.

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- xi. Policy DS3 should provide clarity regarding how to interpret the quantum of development identified for the allocation.
 - xii. The Promoters are committed to working together and with the Council in relation to the promotion and delivery of the Site.

2. MATTER 3 - CLIMATE CHANGE AND THE NATURAL AND BUILT ENVIRONMENT

Issue 1 – Whether the policies relating to climate change and the natural and built environment, are positively prepared, justified, effective and consistent with national policy

- 2.1 Policy EV1 refers to protecting the Borough's '*distinctive landscape*' by requiring new development to protect landscape character and to reinforce sense of place and local distinctiveness alongside maintaining the separate identities of towns and villages.
- 2.2 Paragraph 174 of the NPPF says plans and decisions should protect and enhance valued landscapes [emphasis added] rather than 'distinctive' landscapes. The ambiguity that results from this drafting can be resolved through a modification, such as:

Policy EV1: Landscape

We will carefully manage development to protect the Borough's distinctive landscape. We will do this by:

- **requiring new development to recognise ~~protect~~ landscape character and to enhance valued landscapes ~~reinforce sense of place and local distinctiveness~~; and**
- **requiring new development to maintain the separate identities of our towns and villages.**

- 2.3 Policy EV3 (Areas of Local Separation) seeks to protect open countryside

that separates two neighbouring settlements (SD/2 paragraph 8.17). Notably, allocation HA15 is not identified within such a designation albeit an area of local separation for Loughborough/Quorn (ALS14) is proposed to the east of the railway line (to the east of HA15).

- 2.4 For clarity, Richborough Estates, the Bowler Family and William Davis agree with the objectives of the requirements in Policy DS3(HA15) in relation to landscape and settlement identity are supported (see agreed item vii of the SoCG) and also green infrastructure and biodiversity (see agreed item ix of the SoCG).
- 2.5 However, we note that the Areas of Local Separation are not designated because of any special landscape quality, but rather to preserve “settlement identity”. Therefore, land that is designated as an Area of Local Separation does not preclude development.
- 2.6 Notwithstanding that the area of separation is to the east of the railway line, the indicative diagram associated with allocation HA15 includes area of housing, areas within the allocation site boundary and a third area for structural landscape.
- 2.7 As set out in our Regulation 19 representation (see paragraphs 4.19 – 4.21 and 4.27 – 4.28) there is no justification for the ‘Housing within allocation’ areas as defined nor any justification that this is the appropriate approach for maintaining the settlement identities of Loughborough and Quorn or that development outside of these areas would cause harm.
- 2.8 Furthermore, such a restrictive approach removes any flexibility within the allocation and prevents an appropriate development area and yield from being arrived at through a constraints-led masterplanning exercise that would be conducted as part of a future planning application. Such an approach also has the potential to conflict with the NPPF’s requirement to make effective use of land (paragraph 119).
- 2.9 The employment of indicative areas that restrict development within the

overall allocation, defined without the benefit of landscape assessment is inappropriate.

- 2.10 By contrast, the separate identifies of Loughborough and Quorn can be provided for through an appropriate constraints-led masterplanning exercise. We do not agree with the illustrative diagram being used to, in effect, create a secondary area of local separation within the allocation.