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Our ref: 89771  
Your ref: None



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## **BY EMAIL ONLY**

Dear Mr Barber,

### **Warwick Local Plan – Revised Development Strategy and Sustainability Appraisal / Strategic Environmental Assessment**

Thank you for your email regarding the above, dated 17 June 2013 and received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes this consultation on the Revised Development Strategy. Natural England is generally supportive of the Revised Development Strategy, which, in our view sets out a positive framework for the protection and enhancement of the natural environment. Natural England's comments below are intended to further improve the Strategy.

#### **Revised Development Strategy**

We welcome and support the aspiration to create "Garden Suburbs" (paragraph 4.4.1) and the positive promotion of green infrastructure (GI) for each strategic development site. We suggest the following measures to help support these aspirations.

The LPA may wish to consider the production of GI Concept Statements for strategic development sites. A concept statement is a small document with a map and narrative that explains what kind of place the community, stakeholders and the LPA want to develop. In comparison to more traditional master plans, it is cheaper, quicker to develop, better suited for community engagement, leading to early and better consensus and shared vision for a place with positive approach towards existing assets.

Further information, e.g. how to prepare and develop a concept statement as a practitioner can be found in [Concept statements - Delivering sustainable development](#) (the Planning Co-operative, 2007). Best practice from the [North East](#) gives case studies and further information. The [St Edmundsbury GI strategy](#) is best practice from the East of England region and includes an 'information pack' of [guidelines for developers and planners](#) which outlines on p8 the link between concept statements and master plans. The LPA may wish to explore Worcestershire's GI Concept Plans and Statements as a more local example. GI concept statements may be particularly valuable for sites in multiple ownership or where development will be phased, as it would help to ensure the site works as a whole.

The LPA may wish to consider setting a percentage GI standard, particularly for the larger strategic development sites. The 2007 Eco-towns supplement to the former PPS1 and the Town and Country Planning Association's "The essential role of Green Infrastructure: Eco-towns GI Worksheet" (2008) both encouraged a general rule of 40% of the total land of the development site to be reserved for GI (usually considered to include private gardens). This could be taken as a best practice benchmark and starting point for negotiations for strategic development sites. This approach is being applied elsewhere in the West Midlands, for example in Worcestershire where the 40% standard is written into the Submission draft of the South Worcestershire Development Plan, used in GI Concept Planning and now seen in live planning applications.

For further guidance regarding GI delivery and best practice please see the following:

- NE external GI Guidance: [NE external GI Guidance](#)
- TCPA et al publications: [Planning for a healthy environment - good practice guidance for green infrastructure and biodiversity](#); [Biodiversity by design](#); [Climate change adaptation by design](#)
- [Green Infrastructure by design – adding value to development](#) (best practice from Milton Keynes)
- Natural Environment White Paper
- [England GI Partnership](#)
- Further useful information may be found in our [GI signposting document](#).

Natural England welcomes the clarity regarding specific GI expectations for each strategic development site. We particularly welcome the proposed buffering of wildlife sites and habitats. Consideration should also be given to opportunities to connect sites and habitats, e.g. the proposed country park delivered through the sites south of Warwick and Whitnash could link the existing local sites to the west, 'Brownfield site' and 'New Waters and Nursery Wood', through to the local site in the east, 'Mollington Hill', incorporating the pockets of broadleaf woodland. This would be in keeping with the Lawton Review, [Making Space for Nature: A review of England's Wildlife Sites and Ecological Network \(2010\)](#).

We would welcome clarification that the open space and cycling and walking infrastructure requirements specified for each strategic development site will be integrated into the local GI network. Open space and sustainable transport routes deliver important functions and are a vital part of the local GI network. We welcome the recognition of the connection between sustainable transport routes and GI in relation to the district wide transport mitigation proposals (section 5.6).

We note that GI requirements have not specified for the sub-regional employment site (section 5.5). Employment sites can deliver substantial GI and priority habitat, e.g. through the provision of cycling and walking connections, soft-engineered Sustainable Drainage Schemes (SuDS), green roofs. We recommend including a requirement for the sub-regional employment site to deliver GI.

## **Sustainability Appraisal and Strategic Environmental Assessment**

Natural England welcomes the production of the Final Interim Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). The Interim Report provides a clear narrative of the SA / SEA process. We note the conclusion that the focus of development to the south of Warwick, Leamington and Whitnash has the potential for significant cumulative long-term negative effects on landscape and the historic environment but that careful planning and design is expected to mitigate these impacts. We note the imperative for sustainable design to protect and enhance the landscape and historic environment, as well as biodiversity, air, water and soil quality.

For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594 or email [hayley.fleming@naturalengland.org.uk](mailto:hayley.fleming@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Hayley Fleming

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