

Written Statement for Nuneaton & Bedworth Borough Plan Review

Matter 6 – Detailed Policies

Reference: J. Bigham

Date: 16 June 2024

Issue: Whether the non-strategic detailed policies reflect the Plan's vision, strategic objectives and development strategy and accord with national policy and evidence?

General

In response to Q85, please refer to the previous representation for the Regulation 19 Consultation. In particular references to mixed-use sites and the use of landscape buffers, restrictions on building heights/form and use of landscape screening.

Policy NE1 – Green and blue infrastructure

In answer to Q133, there is a need to address flood resilience schemes within green infrastructure. With climate change in mind, it is important to identify areas which are vulnerable to flood risk early on and to take a catchment-based approach to building in resilience. Natural flood management (NFM) schemes are often the most successful. They use 'various techniques to restore or mimic natural functions of rivers, floodplains and the wider catchment. It aims to store water in the catchment and slow the rate at which water runs off the landscape into rivers, to help reduce flood risk to communities downstream.' They include:

- River and floodplain restoration
- Leaky woody dams
- Tree planting
- Moorland restoration
- Short rotation willow coppicing
- Flood storage
- Agricultural land management

(The Flood Hub, A Catchment Based Approach to Managing Flood Risk).

These schemes often benefit nature recovery and so could form part of a Local Nature Recovery Strategy (LNRS).

Policy NE3 – Biodiversity and geodiversity

In response to Q139, the policy should refer to the Local Nature Recovery Strategy. Although they are not a 'responsible authority', NBBC will still be required, as a planning authority, to produce a Biodiversity Report and this will involve giving details on how LNRS has been taken into account. For Warwickshire, the responsible authority is Warwickshire County Council, working with the Local Nature Partnership. For the West Midlands, it is the West Midlands Combined Authority (WMCA).

In response to Q143, the replacement of habitat should be provided as close as possible to the location where there has been loss; otherwise, there is a danger that some areas (or even river basin districts) could gain at others' expense. This could be a particular problem for deprived areas and overtime it could lead to environmental inequity. Therefore, it is important that biodiversity offsetting receptor sites are identified

throughout the Borough to give developers local options for delivering biodiversity net gain.

In response to Q144, please see the earlier comments for Q48. Apart from when it may be providing nationally important infrastructure, should any strategic allocation be allowed to impact negatively on a local wildlife site? Surely, this would indicate that there are issues with the methodology of the SA. If a concept for a site is not sustainable, then other options/locations should be considered.