

Representations by Mr Howard J Dawson FRICS to the Stage 6 Hearing Session

LUC Landscape Sensitivity Study

Doc: EX156

1. WHBC has produced three previous Landscape Sensitivity studies, in 2012 (ENV/5), 2014 (ENV/9) and 2016 (ENV/11), all of which are contained on the Council's evidence base and all of which formed the foundation for the submitted Local Plan.
2. Landscape Sensitivity will not have changed in the period 2012 to 2019, so the need for a new comprehensive Landscape Sensitivity study is irrational.
3. The new LUC Landscape Sensitivity Study adopts an entirely different methodology to the previous three studies and reaches conflicting conclusions. This does not assist the Examination.
4. The Inspector has not requested a comprehensive new Landscape Sensitivity study and the submission of this new evidence therefore conflicts with the Procedural Guide for Local Plan Examinations 2019 (and with the previous Procedural Practice in 2016).
5. The Inspector should not admit the new LUC Landscape Sensitivity study to this Examination, particularly at this late stage because it causes conflict and confusion.
6. In the event that entirely new sites are proposed for allocation now, for which there has not previously been a Landscape Sensitivity assessment, then only those new sites should be assessed and the same methodology as used in 2012, 2014 and 2016 should be employed.

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3rd November 2019