

Honeybourne Parish Submitted Neighbourhood Plan Consultation

RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Honeybourne Parish Council has submitted its Neighbourhood Plan to Wychavon District Council. In accordance with Regulation 16, Wychavon District Council would like to invite comments from individuals and organisations on the submitted Neighbourhood Plan.

This consultation runs from Friday 23 August to 5pm Monday 7 October 2019.

All comments will be made publicly available and identifiable by name and organisation (where applicable). The personal information you provide on this form will be held and processed in accordance with the requirements of Data Protection Legislation. More information on how we will hold your data can be found at:

<https://www.wychavon.gov.uk/privacy-policy>

Please fill in your details in the boxes below:

Full Name: Delta Planning (obo All Things Wild Ltd)

Organisation (if applicable): Delta Planning (obo All Things Wild Ltd)

Address (including postcode):

Delta Planning
1 Chester Court
1677A High Street
Knowle
Solihull, B93 0LL

Telephone number: [REDACTED]

Email address: [REDACTED]

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Policy H1

Please use the space below to make comments on this part of the Neighbourhood Plan.

Policy H1 – Housing allocations – Site to the rear of Harvard Avenue, behind Badham’s Garage

We object to the omission of site ATW001, currently occupied by All Things Wild, as a housing allocation within the Policy H1 of the Neighbourhood Plan. The Housing Background Paper (July 2019) extract attached at **Appendix 1**, explains that the site has been discounted for housing due to its size. The assessors consider the site to be ‘too vast’, and raise concerns about development encroaching into the open countryside. We do not agree with this assessment for the reasons outlined below.

The site measures 11.2ha (gross) and is partially brownfield, previously developed land. The Neighbourhood Plan (Submission Draft July 2019), acknowledges that the site is previously developed, through its draft allocation as an existing employment site under Policy H14. An individual response to this policy will be provided separately.

The current review of the South Worcestershire Development Plan is seeking to find suitable locations for the provision of an additional 14,000 homes within the combined South Worcestershire Districts. Site ATW001 represents a partial brownfield site, in a sustainable location which would infill an area of land between the two relatively distinct areas of the Honeybourne settlement – the historic core to the south-west, and the more modern predominantly residential part of the village to the north-east. The site sits directly opposite the defined development boundary containing modern housing development, as well as sharing a boundary with a previous housing allocation included in the adopted South Worcestershire Development Plan (now built out). The site is highly accessible, within close walking distance to Honeybourne Railway Station and other amenities such as a supermarket and employment opportunities. We therefore feel that this land should be reconsidered for inclusion within the Neighbourhood Plan.

The land has previously been submitted for consideration through the Neighbourhood Plan process by the previous land promoter (Catesby Estates). The background papers to the Neighbourhood Plan show how this site has been assessed and provides reasons as to why it has been discounted to-date, which have resulted in the site not being carried forwards into the recent reiteration of the plan.

The site in question is occupied by All Things Wild, a local visitor attraction which has occupied this site since 2012. The business employs 42 people from the local area and attracts approximately 100,000 visitors per year. The business has evolved and expanded over recent years and is now considered to have reached full capacity at this site. Due to the fluctuation in visitors throughout the year, during the peak summer

months, the premises can struggle to accommodate the numbers of daily visitors, particularly due to the limitations with the current car parking arrangements. Further expansion options on this site have been exhausted and efforts to secure additional neighbouring land have been unsuccessful.

All Things Wild have been searching for suitable alternative premises for the last 5 years and have finally been able to secure a site which meets their current needs, as well as allowing them room for future expansion. The alternative site is located outside of the village of Honeybourne and beyond the boundary of Wychavon District, within the neighbouring district of Stratford-upon-Avon. It is however only 5 miles away. Plans are progressing to change the use of the existing equestrian site, meaning that there is no long term future for All Things Wild in Honeybourne. All Things Wild will be vacating the site within the next few years, meaning that this site, which is within a central location in a category 1 village, will soon be unoccupied. This is a significant change in circumstance for the existing occupier and represents an ideal opportunity for the Neighbourhood Plan to reconsider the inclusion of ATW001 for potential housing development. We have reviewed the assessment of this site, along with that of the chosen allocated site (H1) and make the following representations to the Neighbourhood Plan consultation.

Within the Honeybourne Housing Background Paper (July 2019), the Housing Site Assessment (included in Appendix 3 of that document) concludes that ATW001 would be 'totally inappropriate' for housing development, on the basis that it is too vast and would significantly extend the settlement pattern into the open countryside. We disagree with this assessment of the site. Firstly, the site relates well to existing housing development in the village. The site is bounded to the east by the previously allocated housing site developed by David Wilson Homes and otherwise well contained visually within the landscape by established planted boundaries along the Gate Brook Inn to the south, and the Ranch Caravan Park to the west. The development of this site would represent a logical form of infilling within a central section of the village, between the two main cores of the settlement. Secondly in terms of scale, although the site is 11.2 hectares, that is a gross area and the net developable area will be reduced significantly as a result of allowing for flood plain issues, a gas pipeline easement, and green infrastructure requirements. The new developable area is approximately 50% of the site and could likely accommodate 180-200 units.

We also disagree with the concerns raised within the Housing Background Paper (July 2019) in relation to issues concerning the volume of traffic and access arrangements associated with a residential housing scheme on this site. It does not appear that these Highways concerns have arisen from any formal assessment by a Highway Engineer, or indeed whether the assessment has had regard to the existing site use and associated daily visitor trips. The existing tourist attraction is open to the public 363 days per year, with peak visitor numbers during the summer months generating in the region of 1,000 visitors per day. This can generate over 225 cars (550 two-way vehicle trips) on a peak day. The existing access has been able to accommodate these levels of vehicle movements and would suggest that the existing access is safe and suitable to accommodate transport pressures generated by a residential housing development. The site benefits from a large stretch of land fronting onto Station Road (180m in length), giving ample scope to re-position a vehicular access point, or increase the number of individual accesses, should this lead to highway safety improvements. We therefore suggest that this site should not be ruled out on the basis of unfounded vehicular access concerns.

The ATW001 site is a partially brownfield site, which currently includes a variety of built structures and fenced enclosures. Visibility within the wider landscape is limited and views into the site are largely restricted to those available from private grazing land to the north. The site is soon to become vacant and due to its previously developed nature, should be treated as a priority for development.

Although the village is understood to have stated a preference for the development of smaller housing sites, the reality is that sites should be selected on grounds of suitability and sustainability and not their size. Larger sites can always be built-out in phases if required. Concerns raised within the Neighbourhood Plan Site Assessment highlight that there is no evidence to support development of the scale associated with the All Things Wild site. However, given the overall need for housing within South Worcestershire, to rule out development on an accessible partially brownfield site within a sustainable settlement, would represent a significant missed opportunity.

In light of this parcel of land becoming available, the landowners have put forward the option of gifting a proportion of the site for the development of a new school within the village, should it be required. Despite current plans and agreed funding to bring forward an extension to Honeybourne Academy, allowing for single tier entry, it is understood that these plans cater for those children currently residing within catchment only. Beyond this point, further expansion of the school is likely to be limited by the physical constraints of the existing school site and that an opportunity to relocate the school would offer flexibility and security for this facility within the settlement. The offer of land for the provision of a new school had been previously put forward within the earlier Neighbourhood Plan consultation process, but we are concerned that this has reflected negatively in the assessment of site ATW001. The Consultation Statement (July 2019) extract included at **Appendix 2**, raises concerns within point 12.01, about the ability of a scheme of this scale to sufficiently fund a new school, thereby questioning the viability of any development on this site. We can clarify that were this land to be allocated for housing, the land owner would be happy to discuss the possible gifting of part of the site to accommodate the relocation of the school. The school itself would be brought forwards and funded by the Education Authority and CIL contributions and will therefore not raise any viability issues with the site coming forward for development.

Policy H1, includes the Neighbourhood Plan's single housing allocation on land to the rear of Harvard Avenue, behind Badham's garage. We consider that this should not be selected ahead of site ATW001, given ATW001 is going to be available in the plan period and is sequentially far more preferable.

The selected housing site (H1), represents a greenfield site, currently pastoral farmland. Any development of this land would represent a direct and visible incursion into the open countryside and would result in the loss of agricultural land. Site H1, is also bordered by a public right of way, which runs along the southern section of the south-western boundary, and the Housing Site Assessment notes that views are available towards the Cotswold Hills. The visual impact of development of this selected site, both in the immediate and wider area is something which we feel has not been given due regard within the site selection process, particularly given the availability of other sites.

Furthermore, within the assessment of this selected site, the Housing Background Paper notes potential issues with access arrangements to this land. The site is described as having limited highway frontage, with access having to be taken from Stratford Road, forming a staggered crossroad with Mickleton Road.

The Assessor comments that the creation of this junction could potentially raise highway safety issues. We would also highlight that any traffic accessing this location would be required to take a convoluted route via Stratford Road, through existing residential housing development. The Assessor raises an alternative access option, which includes the possibility of creating an access through Harvard Avenue, by purchasing, and presumably demolishing existing properties. We consider this solution to be unlikely to come forward, due to land ownership and potential viability issues involved in the purchase of residential homes to make way for access arrangements. In addition, any route through Harvard Avenue would also increase vehicular traffic through an established housing estate, creating pressure at existing junctions. Access arrangements at ATW001, which provides direct access onto the main Station Road are considered to be preferable to the access arrangements to the selected site at H1.

On the basis of the above, we believe that there are strong grounds for the allocation of site ATW001 as a housing development site through the Neighbourhood Plan process ahead of any other site allocation. Whilst we have no objection to both sites being added, if only one site is preferred, then this should be the ATW001 site which is sequentially preferable, easily accessible, partially brownfield land and will be vacant within the Plan period.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes No

Please email this form to policy.plans@wychavon.gov.uk or post it to Planning Policy, Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT.

Site Assessment Form

Completed by:	SN	Date: June 2019
Site Name / Ref	HBY: ATW001 Land at All Things Wild	
Site Address	Station Road Honeybourne WR11 7QZ	
Site Area (hectares)	11.12 hectares in ownership promoter proposing a developable area of 5.21ha after GI, school etc.	

Description/ Overview



The site is a predominately flat greenfield site and has been converted into a visitor attraction with a collection of wild animals, replica dinosaurs and play areas as well as commercial and agricultural buildings.

Planning Policy Considerations

Inside Settlement boundary	No outside the existing planning boundary on opposite side of road.
Conservation Area	No
Other landscape Designation(please state)	None
Nature Conservation	None, but part of site to north is identified as Priority Habitat

Appendix 1: Housing Background Paper extract

Designation	Deciduous woodland. Part of site is crossed by the outer boundary of 2 SSSI/ Ramsar site impact zones
Listed Buildings within site	No
Listed Buildings adjacent to site	No
Tree Preservation Order	No
Flood Zone	Low – some risk at boundary with Brook
Surface Water Flooding	Off Main road and from run-off from Bayliss hill through existing developments.
Public Rights of Way	None
Planning History	<p>Application No :85/01405 Change of use to outdoor poultry breeding and visitor centre and erection of bungalow from agricultural land Decision Date :16/01/1986 Decision :Approved- Change of Use</p> <p>Application No :86/00737 Approval of Reserved Matters following the grant of outline permission W1405-85 outdoor poultry breeding visitors centre and mobile Decision Date :12/06/1986 Decision : Approved- Reserved Matters</p> <p>Application No :89/01326 Proposed bungalow for private use Decision Date :21/09/1989 Decision : Approved- Planning Application</p> <p>Application No :W/99/00694/PP Erection of Livestock Building Decision Date :16/07/1999 Decision :Approved - Planning application</p> <p>Application No :W/03/01916/PN Erection of timber single storey museum/ exhibition building. Decision Date :22/12/2003 Decision :Approval</p> <p>Application No :W/04/00670/PN Replacement shop and tea rooms with related ancillary lavatories, store and incorporating previously approved museum/ education facility Decision Date :18/05/2004 Decision :Approval</p> <p>Application No: AB/12/02714/AB A steel portal frame agricultural building. Decision Date :03/01/2013 Decision :Approval</p> <p>Application No: AB/13/02568/AB</p>

Appendix 1: Housing Background Paper extract

	<p>Proposal :Building for storage of machinery and fodder Decision Date :08/01/2014 Decision :Approval</p> <p>Application No :W/16/00806/PN Demolition of shed and erection of a single storey building to house a soft play area and toilet facilities, providing an extension to the existing facilities at All Things Wild Decision Date :27/05/2016 Decision :Approval</p>
Other SWDP designations affecting site	None
Agricultural Grade	If the site were cleared and returned to agricultural use 3 (Good)
SHLAA reference and summary from non-Strategic Site Assessments	
Site has not been assessed by Wychavon D.C.	

Site Appraisal

Access to Site	<p>on main road Any known restrictive covenant? Unknown but gas main through site Approximately 100 metres from two bus stops</p>
Topography	Flat
Views into the site	The site can be seen from the east, south and north the other boundaries have high hedges and tall trees
Views out of the site	Due to the high hedges and tall tree views out of the site are limited, the site is about 5-10 feet lower than the adjacent road, so the only view out is the houses opposite and to south.
Vegetation	The site is covered with several trees and is surrounded by hedgerow on three sides and bound by the gate brook on the West side
Hydrological features	There are 3 ponds one is a natural pond the other two are man-made, western boundary has the Gate Inn Brook.
Other on site features	The site is run on commercial basis and has several building to facilitate this including a large café, buildings housing wild animals, a shop and various outbuildings used for the storage of equipment/ feed etc.
Signs of contamination?	No visible signs of contamination.
Current use of site	<ul style="list-style-type: none"> a) Commercial tourism b) Keeping of animals c) Mix of commercial and agricultural buildings d) Part brownfield part greenfield site
Any known previous use?	Wild Fowl Trust (Farm)
Utilities on site?	<p>Gas/ Electricity/ Water/ Sewerage All utilities are on site although is worth noting that the high-pressure gas main run on the northern boundary of the site.</p>
Character of Area	Rural

Appendix 1: Housing Background Paper extract

Neighbouring Land Uses	The David Wilson estate bounds the site on the eastern boundary, the north-western and western boundaries back on the Ranch caravan park, to the north, south and south-west is open countryside, with some of the land being used for grazing.
Design Layout Issues	The site is vast and encroaches into the open countryside, significantly extending the settlement pattern. Due to the size of the development volume of traffic and access might be an issue.
Height and character of surrounding buildings	Properties that bound the site are all two storey, the site on the eastern side faces several period properties, and on the western boundary it faces the Honeybourne Conservation Area.

Availability

Ownership	Single
Owner supportive of development?	Yes
Time frame in which site could be developed	Owner is indicating that they would leave the site in 5 years

Development Potential

Is the site considered appropriate for development?	No Too Large. 30 dwellings per hectare on 5.21ha is 156 dwellings, the site is being promoted for 180. Development would significantly alter the character of the area.
Can the entire site be developed?	No, due the flood risk on the boundary with the Gate Brook and to the north west where the high pressure gas main goes through the site.

Potential Development.

If part of site developed we would like to see a mix of housing including bungalows and starter homes.

Any known developer interest?	None, but site being promoted by agent.
Local Opinion (questionnaire responses)	No questionnaire done for this site

Suitability

Which category does this site fall into? Please give reasons for your choice (what are the problems if any)	1. Totally inappropriate - The site is vast and would significantly extend the settlement pattern into the open countryside. There is no need for a development of this size. There are concerns of access issues and volume of traffic.
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Assessment conclusions

Site Available	Yes
Site Suitable	No
Site Achievable	Yes

Conclusion:

The site is considered too large to allocate in the neighbourhood plan as there is no need for a development of this scale, it would encroach into the open countryside and there are concerns over access. A development of this size would deviate significantly from the strategic policies of the SWDP, therefore it has been ruled out for a housing allocation.

Appendix 2: Consultation Statement extract

				community for Honeybourne Primary Academy. We note the comments in paragraph 9.5 of the Plan and will work alongside the parish council and the school to utilise Community Infrastructure Levy funding where possible and available.		
New Sites Submitted						
12.01	Ed Barrett MRTPI Senior Planning Manager	Catesby Estates plc on behalf of Harris and Ford Limited	Site Submission	Harris and Ford Limited is the freehold owner of the former Domestic Fowl Trust site on Station Road - currently occupied by the 'All Things Wild' visitor attraction. A plan showing the extent of Harris and Ford's land ownership (totalling 11.12 hectares) in Honeybourne is enclosed. Catesby Estates is a residential land promotion business based in Warwick. Working on behalf of landowners, Catesby Estates seek to secure outline planning permission for residential development, prior to arranging the sale of sites to housebuilders, who then build the approved homes. Our proposals establish principles which deliver high quality, attractive developments, maximising benefits for local communities. More information on our business and approach to development can be found on our website - www.catesbyestates.co.uk We commend the Neighbourhood Plan Group on the production of the Consultation Draft Neighbourhood Plan and welcome the opportunity to comment on it on behalf of Harris and Ford Limited. The 'All Things Wild' attraction has operated at the former Domestic Fowl Trust site in Honeybourne since 2012. Over this time the attraction has increased in popularity and at peak periods struggles to adequately accommodate the visitor numbers		<p>The site has been assessed in line with all other sites assessed as part of the site allocation process. The assessment will be appended to the Housing Background Paper. The site has been submitted at a late stage in the process. Site allocation opportunities have been assessed on the basis that the community has a preference for small sites to come forward in the Plan period. A robust consultation was held where 4 shortlisted sites were considered by the community and their preferred option selected. The site proposed at All Things Wild is extensive and well beyond the scale the local community were supportive of in earlier consultation. A development of this scale would have a significant effect on the appearance and setting of the settlement. There is also concern with regard to highway impact. There is no evidence to support the need for a development of this scale in Honeybourne in this plan period and it would be a significant deviation from the SWDP. The level of development proposed which includes the provision of a new school is not sufficient to fund the delivery of a school therefore it is questionable whether the proposal is even viable. In addition to this, Honeybourne Academy is</p> <p>Site assessment and summary to be added to the Housing Background paper. Insert new text to paragraph 4.19 "<i>Initially the group decided that it was unnecessary to develop any other locally specific economic policies, relying instead on the SWDP. However, during the Regulation 14 consultation it became apparent that potential changes to two of the larger employment sites may come forward within the Plan period and therefore consideration of the economic significance of these sites and the suitability of SWDP policies was reassessed; it was considered appropriate to develop a locally specific policy to address this area.</i>"</p> <p>Insert new explanatory text to paragraph 6.89 "<i>The Plan does not include an employment allocation but has developed a policy to ensure that the important employment sites in the parish are retained and can be enhanced where appropriate. There is one significant employment site in the parish at Honeybourne Airfield Trading Estate where there are approximately 30 businesses located, along with a number of other smaller employment sites throughout the parish. The aim of the policy is to protect local sources of employment from unnecessary loss and to enable businesses</i></p>

Appendix 2: Consultation Statement extract

			<p>experienced. To maintain its continued growth and commercial viability the attraction needs to expand, however the lack of physical space at the site, particularly car parking provision, combined with the close proximity of adjoining residential properties significantly constrains scope for expansion. The owners of the business have considered and explored all options to expand the attraction, including purchasing additional land, however a solution to suitably accommodate its long term operation in Honeybourne has not been identified. As a result the owners have taken the decision to relocate the attraction to a more suitable site within the next 5 years (i.e. by 2024). In the intervening period the attraction will continue to be operate as normal in Honeybourne. Reflecting the need to identify a suitable future use for the site once the attraction relocates, Harris and Ford have recently selected Catesby Estates as a long term partner to promote the site for future residential development. Once vacated the site will constitute partially brownfield land, where there is a presumption in support of redevelopment - particularly for residential use. It is therefore considered that the site should be allocated for residential allocation in the emerging Neighbourhood Plan. This could be in addition to (or in preference of) the currently proposed greenfield residential allocation to the rear of Harvard Avenue (Policy H1). Our initial design work (enclosed) indicates that the site has capacity to accommodate up to 180 homes and supporting community facilities, including</p>	<p>also already advancing plans to extend within their existing site having secured financing and appointed an architect. The site is an important tourist destination in the parish and attracts locals and visitors alike. It would be a loss to the community as a destination and local employer if it were to leave the site. If the owners do leave within the Plan period there would be support for it being marketed as a going concern, business use, or changing to a community facility. In light of the local importance of this site and other employment sites within the parish it is considered appropriate to develop a policy to help to retain local employment opportunities in the parish.</p>	<p><i>to improve and adapt their premises to help them remain viable for the long term.”</i></p> <p>See next comment for new policy to be inserted.</p>
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Appendix 2: Consultation Statement extract

				land for a relocated primary school. In accordance with policy 40% of the total site would be developed as multifunctional green infrastructure for use by the whole community.			
Late submission	Katherine Lovsey-Barton Principal Planner	Pegasus Group	Site Submission	<p>We are acting on behalf of the landowners of Honeybourne Airfield, Johnson Brothers. Although the formal 12th April consultation deadline has now expired it's my understanding that the Regulation 14 consultation period for the first draft Plan has been extended.</p> <p>Representations to the Council's South Worcestershire Development Plan Review Issues and Options consultation were submitted at the end of last year, promoting the existing 28 hectare employment site at Honeybourne Airfield for a number of future development options. These representations included a number of Indicative Framework Plans depicting three development options for the site, including employment (comprising a mix of B1, B2 and B8 uses), residential development and a mixed use development scheme, including both employment and residential development. These plans, which I have attached, have been prepared having regard to existing constraints, as well as relevant planning policy and guidance, and demonstrate that the site has the potential to accommodate either:-</p> <ul style="list-style-type: none"> • additional employment floor space of up to 133,930 sqm [gross floorspace] as part of a wholly employment development; • a residential development with capacity for up to 422 dwellings (including a 		<p>The Consultation has not been extended but we have given consideration to the site and submission.</p> <p>The site is well removed from the settlement and is not considered appropriate to develop for a standalone housing site. The group have not undertaken a full housing assessment of the site as it does not meet the criteria for consideration. It is not adjacent to, or within the existing settlement, it is well removed and considered to be in an unsustainable location. There is no identified need within the Neighbourhood Plan period for the level of housing growth that is being promoted at this site. Nor is there a need or support for it in the SWDP.</p> <p>The site is an important existing rural employment site and provides multiple businesses with premises; it caters for small independent traders through to large commercial enterprises and as a high level of occupancy.</p> <p>It is considered more appropriate to support the retention of employment use at this site with some enhancements if required, possibly providing improved opportunities for start-ups. It is important that the existing users are not priced out of the market as it is an important employment site in the rural economy.</p>	<p>Insert new policy H14. <i>"Policy H14 Retention and Redevelopment of Existing Employment Sites Policy</i></p> <p><i>To help to ensure the retention of existing rural employment sites in Honeybourne Parish, the following sites that are currently used for B1, B2, B8, tourism, leisure and /or recreation-related purposes will be safeguarded for employment-generating uses during the plan period:</i></p> <ol style="list-style-type: none"> 1. <i>Honeybourne Airfield Trading Estate;</i> 2. <i>Two Shires Park;</i> 3. <i>Brickworks Trading Estate;</i> 4. <i>Westward Business Centre;</i> 5. <i>All Things Wild;</i> 6. <i>Badham's Garage; and</i> 7. <i>The Ranch.</i> <p><i>Applications for a change of use to an activity that does not provide employment opportunities will only be permitted if it can be demonstrated that:</i></p> <ol style="list-style-type: none"> a) <i>There is no market demand for employment, tourism, leisure or recreation purposes through active and continued marketing for at least a period of 12 months; or</i> b) <i>The change is necessary to meet a clear need for community facilities; or</i> c) <i>The site is unsuitable to continue as business use due to environmental</i>

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Delta Planning
1 Chester Court
1677A High Street
Knowle
Solihull, B93 0LL

Telephone number: [REDACTED]

Email address: [REDACTED]

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Policy H12

Please use the space below to make comments on this part of the Neighbourhood Plan.

Policy H12 – Community Facilities

Policy H12 has been included to help protect the existing community facilities within the village. This policy generally echoes the intentions of Policy SWDP37 (built community facilities) within the South Worcestershire Development Plan, the principles of which are supported.

The pre-text to the policy (paragraph 6.74) notes that All Things Wild is a tourist attraction within the village. This is correct. The policy itself then goes on to explain that community facilities should be protected and includes a list of facilities within the village. All Things Wild is not listed (which we support) but the text reference to it makes the situation unclear.

Our concerns therefore relate to the wording of Policy H12, which does not clarify that those community facilities to be protected are those specifically included within the list.

We therefore request that either the reference to All Things Wild within the pretext to the policy be removed, or that Policy H12 is amended to read:

“Development proposals that will result in the loss or significant reduction in scale and value of those community facilities listed above, will not normally be permitted unless....

We also believe that the policy contains an error where within point 9 it refers to “paragraph 7.69” this does not exist and should instead read “paragraph 6.72”.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council’s decision on the Neighbourhood Plan proposal:

Yes

No

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Telephone number: [REDACTED]

Email address: [REDACTED]

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Policy H14

Please use the space below to make comments on this part of the Neighbourhood Plan.

Policy H14 – Retention and Redevelopment of existing employment sites

Policy H14 designates the All Things Wild site as an existing employment site which should be safeguarded for employment uses. The policy does not define the site, reference is just made by name. The definition of the site as an employment site is however incorrect. All Things Wild is a tourist attraction and although it is a 'commercial' use and does employ local people, it is not a traditional employment operation, recognised more commonly by businesses operating within category B use classes.

Policy H14 did not form part of the earlier versions of the Neighbourhood Plan and is an additional policy which is discussed within The Consultation Statement (July 2019), in order to protect existing employment sites.

The inclusion of this policy appears to have arisen as a reaction to previous representations to the Neighbourhood Plan relating to the site (submitted by the previous site promoter, Catesby Estates) which confirmed the intended relocation of All Things Wild from the village of Honeybourne. An extract from this document is included at **Appendix 2**.

Whilst we have no objection to the identification of the site as a potential development site, the allocation for employment is not logical, nor based on any assessment of need.

All Things Wild is operated as a local visitor attraction, and has occupied this site since 2012. Prior to that the site was a poultry breeding/visitor centre. Today the business attracts approximately 100,000 visitors per year, having evolved and expanded over recent years, and is now considered to have reached full capacity at this site. After 5 years of searching, All Things Wild has recently been able to secure a site which meets its current needs and will allow room for further expansion. This new site is within the neighbouring district of Stratford. This move will take place within the next few years.

We raise concerns about the allocation of the site for employment purposes on the basis that the Neighbourhood Plan provides no evidence that this land is needed for employment purposes in the village. The site would not be suitable for industrial uses or office accommodation, due to its location and context within the village. Indeed, although through the allocation of this site as employment land, the policy recognises that it is 'previously developed', the nature of the existing wildlife park use means that the site still retains a largely rural character.

The reasoned justification for the policy explains that its aim is to encourage existing businesses to stay in Honeybourne, thereby maintaining a range of employment opportunities to reduce commuting for the workforce and thus reduce the impact on the

environment. All Things Wild currently employ 42 people from the local area. These jobs will not be lost through the site relocation as the new site is only 5 miles away. Of their current workforce, 35 of their employees already travel to and from work by car. The relocation of the business into Stratford will not result in a significant shift in travel mode. Furthermore, a car share scheme is also being created to cater for the existing staff who wish to use it.

In light of the imminent relocation of All Things Wild, the allocation of the site for employment purposes through Policy H14 will not achieve the goal of retaining this existing business in Honeybourne. It is unsustainable for the business to remain in this location as it needs to expand in order to increase its visitor numbers, something which cannot be achieved in this location, particularly due to car parking limitations on this site.

The site at All Things Wild represents a highly accessible brownfield site in a Category 1 village. It's designation as an employment site will not result in the retention of the business within the village and will instead place uncertainty in the future of what could be an important opportunity for housing growth in this sustainable settlement. The allocation of All Things Wild as an employment site under policy H14 is unnecessary and inappropriate. We therefore recommend that the designation within Policy H14 is removed and the site be allocated under Policy H1 as detailed in the accompanying response to that Policy.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes No

Please email this form to policy.plans@wychavon.gov.uk or post it to Planning Policy, Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT.

Appendix 2: Consultation Statement extract

				community for Honeybourne Primary Academy. We note the comments in paragraph 9.5 of the Plan and will work alongside the parish council and the school to utilise Community Infrastructure Levy funding where possible and available.		
New Sites Submitted						
12.01	Ed Barrett MRTPI Senior Planning Manager	Catesby Estates plc on behalf of Harris and Ford Limited	Site Submission	Harris and Ford Limited is the freehold owner of the former Domestic Fowl Trust site on Station Road - currently occupied by the 'All Things Wild' visitor attraction. A plan showing the extent of Harris and Ford's land ownership (totalling 11.12 hectares) in Honeybourne is enclosed. Catesby Estates is a residential land promotion business based in Warwick. Working on behalf of landowners, Catesby Estates seek to secure outline planning permission for residential development, prior to arranging the sale of sites to housebuilders, who then build the approved homes. Our proposals establish principles which deliver high quality, attractive developments, maximising benefits for local communities. More information on our business and approach to development can be found on our website - www.catesbyestates.co.uk We commend the Neighbourhood Plan Group on the production of the Consultation Draft Neighbourhood Plan and welcome the opportunity to comment on it on behalf of Harris and Ford Limited. The 'All Things Wild' attraction has operated at the former Domestic Fowl Trust site in Honeybourne since 2012. Over this time the attraction has increased in popularity and at peak periods struggles to adequately accommodate the visitor numbers		<p>The site has been assessed in line with all other sites assessed as part of the site allocation process. The assessment will be appended to the Housing Background Paper. The site has been submitted at a late stage in the process. Site allocation opportunities have been assessed on the basis that the community has a preference for small sites to come forward in the Plan period. A robust consultation was held where 4 shortlisted sites were considered by the community and their preferred option selected. The site proposed at All Things Wild is extensive and well beyond the scale the local community were supportive of in earlier consultation. A development of this scale would have a significant effect on the appearance and setting of the settlement. There is also concern with regard to highway impact. There is no evidence to support the need for a development of this scale in Honeybourne in this plan period and it would be a significant deviation from the SWDP. The level of development proposed which includes the provision of a new school is not sufficient to fund the delivery of a school therefore it is questionable whether the proposal is even viable. In addition to this, Honeybourne Academy is</p> <p>Site assessment and summary to be added to the Housing Background paper. Insert new text to paragraph 4.19 "<i>Initially the group decided that it was unnecessary to develop any other locally specific economic policies, relying instead on the SWDP. However, during the Regulation 14 consultation it became apparent that potential changes to two of the larger employment sites may come forward within the Plan period and therefore consideration of the economic significance of these sites and the suitability of SWDP policies was reassessed; it was considered appropriate to develop a locally specific policy to address this area.</i>"</p> <p>Insert new explanatory text to paragraph 6.89 "<i>The Plan does not include an employment allocation but has developed a policy to ensure that the important employment sites in the parish are retained and can be enhanced where appropriate. There is one significant employment site in the parish at Honeybourne Airfield Trading Estate where there are approximately 30 businesses located, along with a number of other smaller employment sites throughout the parish. The aim of the policy is to protect local sources of employment from unnecessary loss and to enable businesses</i></p>

Appendix 2: Consultation Statement extract

			<p>experienced. To maintain its continued growth and commercial viability the attraction needs to expand, however the lack of physical space at the site, particularly car parking provision, combined with the close proximity of adjoining residential properties significantly constrains scope for expansion. The owners of the business have considered and explored all options to expand the attraction, including purchasing additional land, however a solution to suitably accommodate its long term operation in Honeybourne has not been identified. As a result the owners have taken the decision to relocate the attraction to a more suitable site within the next 5 years (i.e. by 2024). In the intervening period the attraction will continue to be operate as normal in Honeybourne. Reflecting the need to identify a suitable future use for the site once the attraction relocates, Harris and Ford have recently selected Catesby Estates as a long term partner to promote the site for future residential development. Once vacated the site will constitute partially brownfield land, where there is a presumption in support of redevelopment - particularly for residential use. It is therefore considered that the site should be allocated for residential allocation in the emerging Neighbourhood Plan. This could be in addition to (or in preference of) the currently proposed greenfield residential allocation to the rear of Harvard Avenue (Policy H1). Our initial design work (enclosed) indicates that the site has capacity to accommodate up to 180 homes and supporting community facilities, including</p>	<p>also already advancing plans to extend within their existing site having secured financing and appointed an architect. The site is an important tourist destination in the parish and attracts locals and visitors alike. It would be a loss to the community as a destination and local employer if it were to leave the site. If the owners do leave within the Plan period there would be support for it being marketed as a going concern, business use, or changing to a community facility. In light of the local importance of this site and other employment sites within the parish it is considered appropriate to develop a policy to help to retain local employment opportunities in the parish.</p>	<p><i>to improve and adapt their premises to help them remain viable for the long term.”</i></p> <p>See next comment for new policy to be inserted.</p>
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Appendix 2: Consultation Statement extract

				land for a relocated primary school. In accordance with policy 40% of the total site would be developed as multifunctional green infrastructure for use by the whole community.			
Late submission	Katherine Lovsey-Barton Principal Planner	Pegasus Group	Site Submission	<p>We are acting on behalf of the landowners of Honeybourne Airfield, Johnson Brothers. Although the formal 12th April consultation deadline has now expired it's my understanding that the Regulation 14 consultation period for the first draft Plan has been extended.</p> <p>Representations to the Council's South Worcestershire Development Plan Review Issues and Options consultation were submitted at the end of last year, promoting the existing 28 hectare employment site at Honeybourne Airfield for a number of future development options. These representations included a number of Indicative Framework Plans depicting three development options for the site, including employment (comprising a mix of B1, B2 and B8 uses), residential development and a mixed use development scheme, including both employment and residential development. These plans, which I have attached, have been prepared having regard to existing constraints, as well as relevant planning policy and guidance, and demonstrate that the site has the potential to accommodate either:-</p> <ul style="list-style-type: none"> • additional employment floor space of up to 133,930 sqm [gross floorspace] as part of a wholly employment development; • a residential development with capacity for up to 422 dwellings (including a 		<p>The Consultation has not been extended but we have given consideration to the site and submission.</p> <p>The site is well removed from the settlement and is not considered appropriate to develop for a standalone housing site. The group have not undertaken a full housing assessment of the site as it does not meet the criteria for consideration. It is not adjacent to, or within the existing settlement, it is well removed and considered to be in an unsustainable location. There is no identified need within the Neighbourhood Plan period for the level of housing growth that is being promoted at this site. Nor is there a need or support for it in the SWDP.</p> <p>The site is an important existing rural employment site and provides multiple businesses with premises; it caters for small independent traders through to large commercial enterprises and as a high level of occupancy.</p> <p>It is considered more appropriate to support the retention of employment use at this site with some enhancements if required, possibly providing improved opportunities for start-ups. It is important that the existing users are not priced out of the market as it is an important employment site in the rural economy.</p>	<p>Insert new policy H14. <i>"Policy H14 Retention and Redevelopment of Existing Employment Sites Policy</i></p> <p><i>To help to ensure the retention of existing rural employment sites in Honeybourne Parish, the following sites that are currently used for B1, B2, B8, tourism, leisure and /or recreation-related purposes will be safeguarded for employment-generating uses during the plan period:</i></p> <ol style="list-style-type: none"> 1. <i>Honeybourne Airfield Trading Estate;</i> 2. <i>Two Shires Park;</i> 3. <i>Brickworks Trading Estate;</i> 4. <i>Westward Business Centre;</i> 5. <i>All Things Wild;</i> 6. <i>Badham's Garage; and</i> 7. <i>The Ranch.</i> <p><i>Applications for a change of use to an activity that does not provide employment opportunities will only be permitted if it can be demonstrated that:</i></p> <ol style="list-style-type: none"> a) <i>There is no market demand for employment, tourism, leisure or recreation purposes through active and continued marketing for at least a period of 12 months; or</i> b) <i>The change is necessary to meet a clear need for community facilities; or</i> c) <i>The site is unsuitable to continue as business use due to environmental</i>