

Reiss Sadler

Planning Officer (Policy)

Malvern Hills and Wychavon District Councils

Civic Centre

Queen Elizabeth Drive

Pershore

WR10 1PT

18th February 2019

Dear Mr Sadler

**RE: Pebworth Parish Neighbourhood Development Plan –
Consultation Draft Regulation 16**

Worcestershire County Council welcomes the opportunity to comment on the above consultation. The following officer-only response is from our Flood Management, Education, Sustainability, Public Health and Minerals & Waste teams. Other Worcestershire County Council teams may choose to make their own response.

If you would like to discuss any of these comments please do not hesitate to contact Marta Dziudzi-Moseley [REDACTED]

Emily Barker
Planning Services
Manager

Business,
Environment and
Community
County Hall
Spetchley Road
Worcester
WR5 2NP

[REDACTED] in
the first instance.

Yours Sincerely,

Emily Barker

Planning Services Manager

Introduction

We would like to bring to your attention comments made in the previous Worcestershire County Council response to the Pebworth Neighbourhood Plan Regulation 14 Consultation. It appears that these comments were not fully addressed in this consultation draft and as such we resubmit the response which is available in Appendix A.

We advise that our previous points are addressed in the final neighbourhood plan document. The following additional points should also be taken into account:

Waste and Minerals

In addition to our previous comments (Appendix A), please note that the latest version of the Minerals Local Plan is at the 4th Stage Consultation. The Plan and associated documents can be downloaded from the [Worcestershire County Council's webpages](#).

Education

Education would like to reiterate the statement made in our previous comments (Appendix A). We also note the comments and concerns raised by local residents in regards to the school.

Appendix A

Mr J. Stedman

Pebworth Parish Clerk,

1 Ban Brook Road, Salford Priors,

Evesham, WR11 8XE

19th September 2018

Dear Mr Stedman

**RE: Pebworth Parish Neighbourhood Development Plan –
Consultation Draft Regulation 14 Statutory Consultation**

Worcestershire County Council welcomes the opportunity to comment on the above consultation. The following officer-only response is from our Flood Management, Education, Sustainability, Public Health and Minerals & Waste teams. Other Worcestershire County Council teams may choose to make their own response.

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Yours Sincerely,

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Flood Management

In 2010 the Flood and Water Management Act (FWMA) delegated upper-tier authorities as Lead Local Flood Authorities (LLFA) with responsibility for their respective area's Local Flood Risk Management.

Worcestershire County Council (WCC) is therefore the LLFA for Worcestershire. This role currently relates to ordinary watercourses (usually smaller brooks and streams but not all), surface water (overland flow) and groundwater flooding - fluvial flooding from main rivers is still currently the responsibility of the Environment Agency.

Sustainable Drainage systems (SuDS) are mentioned briefly in the Plan. Given the flood risk identified in the parish the LLFA would recommend that more detailed information be added to the current policies that mention SuDS to strengthen them.

Policy P1 – Land at Fibrex Nurseries

This has said that an attenuation pond should be constructed to handle surface water and reduce flood risk. Whilst this may indeed be concluded to be the best option for surface water attenuation, it would be better here to suggest extensive use of SuDS with multiple benefits. An attenuation pond may not be the ideal form of storage once the site and all other factors are considered.

Policy P3 – Design Policy

This policy contains some good information on the use of SuDS on developments of all sizes. The LLFA suggest reference is made to the WCC SuDS Guide which is available on the WCC website http://www.worcestershire.gov.uk/info/20236/flood_risk_management/1045/flood_risk_and_development/4.

This policy should also be expanded to include wording on the long term maintenance of SuDS. To ensure that the drainage systems keep functioning

as they should regular maintenance is required. The policy should require a maintenance plan to be submitted for all developments to ensure that a plan and a suitable relevant body is in place to continue maintenance of SuDS for the lifetime of the development.

Either this policy or potentially Policy P8 should mention retrofitting fits when re-using, converting or adapting existing buildings and other brownfield sites. A brownfield development can still make extensive use of SuDS and make a big impact on the flood risk of the local area.

Education

We are pleased to see that the Pebworth Parish Council consider the local school of Pebworth First a key community asset, a sentiment shared by Worcestershire County Council. Community support is crucial to the longevity and sustainability of small rural schools, we are therefore pleased to see the ongoing prioritisation of the school for community and development funding and support.

Sustainability

Energy

The proposal to include provision for renewable energy as part of the design policy is positive and supports policy 27 of the South Worcestershire Development Plan. The UK has a target of 15% of UK energy needs to be delivered through renewable energy by 2020 under the EU Renewable Energy Directive.

It may also be beneficial to address the overall energy efficiency of the buildings to ensure the energy demand is as low as possible. Reducing the need for energy can support those households who struggle to afford to heat their homes and reduce the risk of fuel poverty and fuel debt as well as reducing carbon emissions. The latest figures show that over 10% of

households in Wychavon District are considered to be fuel poor meaning they have high energy costs but a low household income.

It would be encouraging to see recognition of the issues of fuel poverty, energy efficiency and emissions. The infrastructure proposals for using the community funding may be an opportunity to see local action in this area. Potential projects supported through developers' contributions could include improvements to energy efficiency of existing housing stock. The UK Government has a target to improve the energy efficiency performance of homes towards and band C energy rating through their fuel poverty strategy 'Cutting the cost of keeping warm'.

Ultra low emissions vehicles

We welcome the inclusion of wording on electric vehicle charging points covering 1 for every 50 parking spaces. [The Road to Zero Strategy](#) produced by the UK Government outlines the intention to consult on proposals for all new UK homes to have an electric vehicle charge point where appropriate.

Water efficiency and waste

The Neighbourhood Plan could consider improvements to water efficiency including the provision of water butts and support for reducing the waste to landfill with the provision of compost bins for new homes. This would support the proposal to provide appropriate storage for the separation of recyclables.

Climate change

Climate change mitigation and adaptation are central to the NPPF.

The UK Climate Change Act 2008 sets legally binding targets for the UK to reduce carbon emissions by 80% by 2050. New developments will be around for a considerable number of years, it is important that they remain fit for purpose over their lifetime as the climate changes. The Plan could consider actions to improve the local resilience such as wider guttering, green roofs, permeable paving etc.

Further information and guidance

For further guidance related to low carbon neighbourhood planning

<https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/energy-advice/planning/renewables/low-carbon-neighbourhood-planning-guidebook.pdf>

The Plan could take account of the Worcestershire Partnership Climate Change Strategy

http://www.worcestershire.gov.uk/info/20235/sustainability/1092/county_strategies

Public Health

We recommend that references to health and wellbeing are strengthened in this Plan. Specific points that could be influenced by the Plan include green spaces/amenities to improve physical activity (covered to an extent), improving healthy eating amongst adults, and reducing binge drinking / alcohol consumption.

The Public Health England's Local Health Report for the Honeybourne and Pebworth wards, submitted with this response, should help to inform the approach to health and wellbeing in the Neighbourhood Plan.

Waste and Minerals

Paragraph 1.3 refers to the Neighbourhood Plan becoming "part of the statutory "Local Development Plan" alongside the South Worcestershire Development Plan." The Development Plan for the area also includes other Development Plan Documents, including the adopted Waste Core Strategy and the saved policies of the County of Hereford and Worcester Minerals Local Plan which will be replaced by the new Worcestershire Minerals Local Plan once it is adopted. We would suggest that this paragraph be amended to read:

1.3 A Neighbourhood Plan produced and agreed by the people who live in Pebworth, gives us a very strong say in the future development of the parish. A Neighbourhood Plan, once adopted, becomes part of the statutory “Local Development Plan” alongside adopted Development Plan Documents (including the South Worcestershire Development Plan, and the Worcestershire Waste Core Strategy and Minerals Local Plan). This means that planning decisions in the parish must be taken in accordance with the Neighbourhood Plan.

Similarly, paragraph 1.8 states that the plan must be in general conformity with the strategic policies of the Local Development Plan, specifying that this is the South Worcestershire Development Plan (SWDP) 2016, whereas it also needs to be in conformity with the other parts of the Development Plan. We would suggest deleting the reference to the SWDP from this paragraph.

We are satisfied that the July 2018 consultation draft of the Pebworth Neighbourhood Plan is in general conformity with, and does not conflict with, the adopted Worcestershire Waste Core Strategy, the saved policies of the adopted County of Hereford and Worcester Minerals Local Plan, or the emerging Worcestershire Minerals Local Plan.