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E-mail: [REDACTED]  
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By email

[policy.plans@wychavon.gov.uk](mailto:policy.plans@wychavon.gov.uk)

Planning Policy  
Wychavon District Council  
Civic Centre  
Queen Elizabeth Drive  
Persnore  
WR10 1PT

Dear Sir/Madam

### **Bredon Parish Submitted Neighbourhood Plan Consultation**

RPS has been instructed by Barratt West to undertake representations on their behalf in respect of the above consultation. Barratt West (Barratt) has controlling interests on an area of land known as 'Land at Mitton', which falls within the Neighbourhood Plan area. Barratt has promoted Land at Mitton through the South Worcestershire Development Plan (SWDP) and recently through the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS).

Land at Mitton is located adjacent to the line of existing development, north of a modern housing estate at Mitton and west of the Tewkesbury Business Park.

Barratt has already made representations to the Pre-Submission Neighbourhood Plan, indicating a number of concerns with two policies in particular:

- Policy NP1: Spatial Plan for the Parish; and
- Policy NP2: Local Gaps and Key Views.

The Submission Neighbourhood Plan does not appear to have addressed these concerns and therefore Barratt's objections to the Plan remains.

The principal objection resulting from the Submission Neighbourhood Plan relates to the inclusion of Land at Mitton within GAP5, a local gap identified as part of emerging Policy NP2. Barratt maintains the view that this policy is not consistent with Policies 2 and 62 of the adopted SWDP and with the National Planning Policy Framework, which requires that Neighbourhood Plans be in general conformity with the strategic policies of the Local Plan.

### **Policy Update**

#### *South Worcestershire Development Plan*

In the previous submission made by Barratt, it was noted that that there were important omissions from the policy section of the Neighbourhood Plan, relating to the status of the SWDP.

Policy SWDP 2 of the adopted South Worcestershire Development Plan states that:

***“As required by the Duty to Cooperate, due consideration will be given, including through a review of the SWDP where appropriate, to the housing needs of other local planning authorities in circumstances when it has been clearly established through the local plan process that those needs must be met through provision in the SWDP area.” SWDP 2, (I)***

Footnote 6 makes specific reference to land at Mitton, stating:

***“Cheltenham Borough, Gloucester City and Tewksbury Borough Councils are preparing a joint Core Strategy (JCS). Land at Mitton (Wychavon District) and the Myth (Malvern Hill District) were not included as strategic allocations in the Submission version of the JCS (November 2014). The South Worcestershire Councils will, however, continue to monitor progress on the examination of the JCS.”***

This is recognised by the emerging Neighbourhood Plan which recognises the importance of Policy SWDP2 in the policy context section (paragraph 3.5 refers), where it is indicated that Policy SWDP2 is of ‘special relevance’ to the Neighbourhood Plan.

Whilst Policy SWDP2 is included within the Neighbourhood Plan’s list of relevant policies (paragraph 3.4 refers), the Plan does not include reference to Policy SWDP62, which deals with the implementation of strategic policies in the SWDP.

In particular, SWDP62 considers trigger mechanisms which would lead to the review of the SWDP, listed within the reasoned justification to the Policy. This states (paragraph 4a/b refers) that a review of the SWDP could occur should Policy SWDP 2 fail to be delivered and additionally, if evidence of unmet need from outside the SWDP area is identified and not addressed. It is considered that Land at Mitton falls within this requirement as a sustainable location outside of the SWDP area to meet unmet need arising from Tewkesbury.

Barratt suggest that Paragraphs 3.4 and 3.5 of the Neighbourhood Plan should be amended to note that both Policy SWDP2 and Policy SWDP62 are of special relevance to the BPNP.

#### *Gloucester, Cheltenham and Tewkesbury Joint Core Strategy*

The JCS Examination is currently taking place. The first hearings were held in December 2015. Following those hearings, the Inspector published an Interim Report in May 2016.

The Inspector’s Interim report identifies a housing shortfall in Tewkesbury and the need ‘to consider the potential for additional strategic allocations in this general locality.’

Specifically, the Interim Report noted in respect of Land at Mitton that:

- ***‘The sites lie outside the Green Belt, within Broad Location T1, in an area of mainly medium to low landscape sensitivity, which is unaffected by AONB’ (paragraph 162);***
- ***‘The Mitton sites are closer to the Tewkesbury urban settlement than to any other Town or village and, in terms of sustainability, are better related to Tewkesbury Town than elsewhere. Mitton clearly has the capacity and potential to contribute to meeting Tewkesbury’s needs and its exclusion from the Gloucestershire housing market should not be an obstacle to its delivery’ (paragraph 164); and***

- ***'Accordingly I recommend that the JCS authorities engage in constructive discussions with Wychavon District Council with a view to seeking their agreement on the release of land at Mitton to contribute towards Tewkesbury's housing requirement' (paragraph 166).***

Since the JCS Inspector published her Interim Report, further Examination hearings took place and the Inspector saw it fit that the Councils should further consider how Land at Mitton could come forward to be designated towards the JCS supply of housing.

Further to this, Wychavon District Council and Tewksbury Borough Council have now agreed to work on a Memorandum of Understanding. The Memorandum of Understanding will provide a clear commitment to the identification of the site, enabling the site's allocation through a future Local Plan Review of the SWDP.

## **Policy NP2**

In addition to the issue that, as submitted, the designation of GAP5 conflicts with Policies SWDP2 and SWDP61, we are concerned that Land at Mitton, falling partly within GAP 5, cannot be said to prevent settlement coalescence or indeed to safeguard land that is important to the setting of a village. The Parish Council consider this policy to be both consistent with paragraph 184 of the NPPF and the strategic policies of the Local Plan.

Further to the comments above, Barratt consider that Policy NP2 is not compliant with Policy SWDP2 and SWDP62 of the adopted Local Plan, for the reasons set out below:

It is unclear how the Parish Council has come to the view on the figure of 1,000m which appears to be unsupported by evidence. The 1,000m threshold is considered somewhat arbitrary in calculating the impact of neighbouring settlements and does not take into account local features such as topography or vegetation which may obscure and limit the impact of settlement expansion.

It should be noted that GAP5 (Bredon's Hardwick to Tewkesbury) has not been excluded at this stage of assessment, as it is considered that the gap between the settlements is 720m on one side. The calculation of this figure is incorrect. Taken from Manor Park, which is the most northern extent of development within the identified parcel, it is over 1,400m to Bredon's Hardwick (taken from the properties at the junction of the B4080/Hardwick Bank junction. This figure would increase if development on the other side of the road was considered. The Parish Council have incorrectly appraised this site and have not accounted for the clear physical and visual separation between the edge of Tewksbury and the settlement of Bredon's Hardwick.

We believe that there are simply no grounds for suggesting that Land at Mitton needs to be the subject of a gap policy to prevent settlement coalescence between Tewksbury and Town and Bredon's Hardwick.

In terms of the contribution that Land at Mitton makes to the setting of Bredon's Hardwick, again, distance and local features are an important consideration. Paragraph 7.10 of the Neighbourhood Plan suggests that each of the proposed Local Gap areas helps '...to maintain a clear separation between settlements in order to retain their individual identity.' We would contend that much of GAP5 cannot be said to adjoin Bredon's Hardwick or contribute directly to its individual character.

Due to local topography, and with appropriate landscaping, much of the green corridor along the B4080 could be maintained following development on land at Mitton.

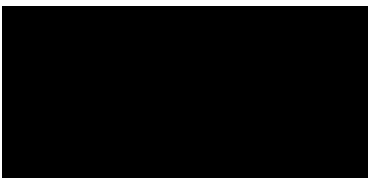
The Parish Council's Local Gaps assessment refers to the need for the ambition of the Neighbourhood Plan to be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans should not undermine the strategic policies of the Local Plan. These references are of direct relevance to the District and Borough Council's need to meet objectively assessed housing need, and the identified role that the land at Mitton could play in meeting some of this housing need. We believe that Policy GAP5 therefore undermines Policy SWDP 2.

In terms of the criteria used to identify the Local Gaps, comments are raised below:

- Test 1 – For the reasons set out above, the Land at Mitton should be excluded from further consideration, as the SWDP makes specific reference to the potential role of this land in meeting future development needs.
- Test 2 – There is no 'significant danger' of Tewksbury and Bredon's Hardwick coalescing, and it is certainly the case that development on Land at Mitton would result in settlement coalescence.
- Test 3 – The second bullet under Test 3 states that for land to be designated as a Local Gap refers to the contribution the land currently makes to character and rural setting. As previously stated, it is very difficult to see how development on Land at Mitton would materially impact on these factors, and therefore it is very difficult to understand the justification being suggested by the Parish Council for identification of the subject land as part of a Local Gap.

In summary, we object in the strongest possible terms to the inclusion of Land at Mitton within GAP 5 as part of Policy NP2. Indeed, we do not support GAP 5 as a matter of principle, as it conflicts with the provisions of Policy SWDP2 and SWDP 62, and with the clear national and local mandate to deliver a step change in housing delivery in sustainable locations.

Yours sincerely  
for RPS



**TIM WATTON BA (Hons) Dip TP MRTPI  
TECHNICAL DIRECTOR**

