



**Honeybourne Parish Council**

**Worcestershire**

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Sent via Wychavon District Council.

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Dear Chris Collison,

**Honeybourne Parish Council's Response to the Honeybourne Neighbourhood Development Plan Independent Examination – Examiner's letter seeking clarification of matters.**

Please see the Parish Council's responses to the matters raised below.

**1. Policy H1**

**Examiner:** The comments of the Parish Council on the representations of other parties include *"The indicative number of 50 dwellings is considered accurate as it reflects the need to deliver on-site green infrastructure, acoustic buffering for the railway line, SuDS, an easement and suitably reflects its edge of settlement location. The proposed figure is based on 50% of the site being developable after the on-site requirements have been dealt with, and assumes 30 dwellings per hectare which is appropriate for a rural location."* The NPPF states plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. The NPPF states this will be tested robustly at examination. Could you please direct me to existing evidence that supports the assumption that 50% of the allocation site will be developable after on-site requirements have been dealt with.

**Parish Council Response:** SWDP5 in the adopted Local Plan has a requirement that greenfield sites that exceed 1 hectare should provide 40% of the site as Green Infrastructure; the site is 3.3 hectares. Immediately this reduces the developable area to 1.98 hectares. It is anticipated that SuDS and a buffer for the railway line could be accounted for within this GI. However there is still a need for road infrastructure through the site, therefore the developable area has been estimated to be reduced by a further 10% to 50% of the site area. The proposed developable area is 1.65 hectares with a proposed density appropriate for an edge of rural settlement location of 30 dwellings per hectare, again complying with the requirements of the adopted Local Plan policy SWDP13 part Eiii.

This rationale is explained in the Neighbourhood Plan's response to comment 11.06 in the Consultation Report (page 50), and is also readdressed at comment 14.02 on page 52.

## 2. Policy H7

**Examiner:** a). The Planning Practice Guidance states “A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan”. (Planning Practice Guidance Paragraph: 019 Reference ID: 37-019-20140306 Revision 06 03 2014). Could you please advise me of any contact with landowners about proposals to designate their land as Local Green Space?

**Parish Council Response:** See para 4.25 of the Consultation Statement. All landowners of the 14 initially shortlisted sites were written to in June 2018 prior to the shortlisted sites being shared with the public at an event on 7<sup>th</sup> and 8<sup>th</sup> July.

The only response received ahead of the consultation event was from Rosconn representing the land to the rear of Harvard Avenue where they disagreed with the sites use by the public, stating that only a small element of the site had a public right of way through it. The site was also shortlisted and consulted on at the same event as a housing site and has subsequently been proposed as the housing allocation at policy H1.

All results from the consultation on the 7 and 8 July 2018 can be found here <https://honeybournendp.org/wp-content/uploads/2018/07/Results.pdf>

On July 14 2018 the Parish Council sent an email fully supporting the Neighbourhood Plan’s intention to propose designating Parish Council owned or controlled land as Local Green Space.

No other written responses were received from the landowners.

Unfortunately this detail regarding the letters sent to landowners has been accidentally omitted from the Green Space Background Paper. Should you wish to see further evidence of letters and responses received this can be provided.

**Examiner:** b). A representation has stated proposed Local Green Spaces 7 Fields around the Church, and 8 Gate Inn Field, are extensive tracts of land. The Green Space Background Paper (July 2019) states LGS 7 has a site area of 280.8 square metres which would appear to be an error. Could you please confirm the site area of LGS7?

**Parish Council Response:** The site area quoted appears to be an error. The correct site area for LGS7 is 0.43 ha.

## 3. Policy H14

**Examiner:** Policy H14 seeks to safeguard existing rural employment sites used for B1, B2, B8, tourism, leisure and/or recreation related purposes for employment generating uses. Strategic Policy SWDP12 safeguards existing employment sites in rural areas that are

currently or were last used for B1, B2, B8, tourism, leisure and/or recreation-related purposes for employment-generating uses. In this respect how does Policy H14 provide a distinct local approach to that set out in strategic policy SWDP12?

**Parish Council Response:** The policy specifically identifies the sites that the policy applies to, providing clarity and adding a layer of local distinctiveness. The Regulation 14 Consultation saw two employment sites being promoted for alternative uses. The main purpose of the policy is to protect the main employment sites in the parish from unnecessary loss and to enable businesses to improve and adapt their premises to help them remain viable for the long term.

The policy sets out under what circumstances a change of use would be permissible, this is not contained within the SWDP, for example a change to a community facility would be supported where there is an evidenced need, or if the site becomes unsuitable to continue as a business use due to environmental considerations. The policy also provides clarity on the Plans support for improvements to employment sites subject to specific criteria (d to g).

**Examiner:** Policy H14 seeks to safeguard specific named sites. Are the named sites defined on any existing maps and have such maps been subject to consultation?

**Parish Council Response:** The sites have not been identified on a map and it is acknowledged that this would be useful and provide further clarity. The sites were consulted on as part of the Regulation 16 consultation undertaken by Wychavon District Council.

**Examiner:** In commenting on the representations of other parties the Parish Council describe the All Things Wild site as follows "*the majority of the site is greenfield land, retaining a 'largely rural character'*". Is it intended Policy H14 should apply to the entire All Things Wild site?

**Parish Council Response:** It is intended that the policy relates to the buildings within the site and their current use for employment related purposes, not the agricultural/ greenfield land within the wider site currently operating as All Things Wild.

**Examiner:** Policy H14 seeks to introduce two criteria (b and c) additional to the criterion included in strategic policy SWDP12. Could you please direct me to the existing justification for these additional criteria?

**Parish Council Response:** Criterion b) The resident questionnaire highlighted the local concerns about the speed of growth in the village in recent years, the lack of infrastructure provided as part of this and a knock on requirement to improve facilities (see para 4.8 and 4.16 of the Submitted Plan and the results from the residents survey <https://honeybournendp.org/wp-content/uploads/2018/02/HNDP-Questionnaire-Results.pdf>. ) Residents' suggestions for improved facilities included the need for GP surgery, school extension and improved village hall. The Plan would therefore be flexible

and support a change of use from B1, B2, B8, tourism, leisure and /or recreation where it can be evidenced that there is a need for a community facility, such as these.

Criterion c) This criterion is to address matters that may arise with changes in the natural environment and/ or any subsequent alterations to government legislation. If the site cannot continue in an employment use due to environmental issues for example changed circumstances due to climate change, pluvial and fluvial flooding, pollution hazards or the impact on protected natural habitats/ species, this criterion permits a change of use. This reflects the NPPF's aim to meet the challenge of climate change and to conserve the local natural environment by preventing development from contributing to and being put at unacceptable risk from pollution. The Parish is already affected by flooding and these events are likely to increase in intensity and frequency, see page 40 of the submitted Plan.

**Examiner:** Does the final sentence of Policy H14 relate to the third paragraph of the policy only?

**Parish Council Response:** No, it is intended to relate to change of use applications and any improvements to employment site applications.

**Examiner:** The third paragraph of Policy H14 includes the term "*improve*". Strategic Policy SWDP12 refers to "*expansion*" and "*intensification*" of existing employment sites. There is advantage in use of consistent terminology in different parts of the Development Plan. Is it intended the third paragraph of Policy H14 should refer to intensification of use of existing employment sites?

**Parish Council Response:** The policy uses the word improvement as some of the sites consist of buildings that are aging and would benefit from improvement either through alterations or replacement; the policy is supportive of this.

Intensification of employment sites will be supported where it is appropriate taking account of the requirements of criteria d-g of the policy. Account should be taken of residential amenity and the impact on neighbouring uses.

We trust these responses are useful and provide further clarity for the examination process.

Yours sincerely,



**John Stedman**

➤ Clerk, Honeybourne Parish Council