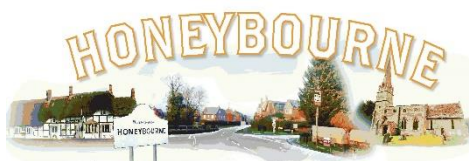


Honeybourne Parish Council



Worcestershire

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Sent via Wychavon District Council.

11 November 2019

Dear Chris Collison,

Honeybourne Parish Council's Response to the Honeybourne Neighbourhood Development Plan Independent Examination - Examiner's Initial Letter.

Please accept this letter as confirmation of receipt of the Examiner's initial letter dated 29 October 2019. As requested the letter has been uploaded on to the Honeybourne Neighbourhood Plan website <https://honeybournendp.org/> where links to the District Council's website and all documentation associated with the examination can be found.

We are also in agreement that all correspondence we send to you as part of the examination will be sent to Wychavon District Council for them to forward to you on our behalf.

As you have provided us with an opportunity to comment on the representations received from other parties during the Regulation 16 Consultation we would like to make the following comments.

Representation 2: Sport England:

We would like to confirm that we have proposed to protect the openness of the Sports and Recreation Field in the parish by designating it as Local Green Space under policy H7 Local Green Space, and have also sought to protect its future use under policy H12 Community Facilities. Both policies are considered to have due regard to the NPPF including paragraph 97 and meet the Basic Conditions as outlined in the submitted Basic Conditions Statement. We can confirm that the SWDP Play Pitch Strategy was reviewed as part of the evidence base and is referenced in the submitted Green Space Background Paper at paragraph 2.15.

Representation 8: Anna Brindle, Delta Planning on behalf of All Things Wild Ltd:

a) Comments on Policy H1 Site to the Rear of Harvard Avenue behind Badham's Garage

We would like to reiterate that the scale of the All Things Wild site being promoted by Delta Planning for residential development in Representation 8 would dramatically alter the form of the settlement of Honeybourne. There is no identified need for this level of housing in

Honeybourne within the Plan period nor is there community support. The representation refers to the SWDP Review, stating that there is a requirement to provide an additional 14,000 dwellings across South Worcestershire until 2041. The recently published SWDP Review has not proposed any further allocations in Honeybourne and has developed a comprehensive strategy to deliver these housing numbers elsewhere within South Worcestershire.

The gifting of land for the provision of a school is not required. Although recent capacity numbers and projections published in 2018 confirm that the school does need to grow liaison with the school and the County Council has provided clarity that the school will expand on its existing site and plans for delivering this are well underway. This is explained in both the submitted Consultation Statement (responses to reps 17.01, 20.12, 32.11, 35.12 and 12.01) and within the submitted Plan at paragraphs 4.16 and 6.66 to 6.69.

The promoter of the All Things Wild Site is considered to place too much emphasis on relatively small brownfield element of the site, as this only represents a small proportion of the site they would like to see changed to residential use. There is one dwelling and the extended café/visitor centre that can be classified as brownfield land. The remaining structures on the site are agricultural buildings (See Planning History page 46 of the submitted Housing Background Paper); the remainder of the land used for keeping animals is also in agricultural use, therefore the majority of the site is greenfield land, retaining a *“largely rural character”* as recognised on page 16 of their submission. Therefore their justification for locating development on this site because it is *“partially brownfield”* over the identified site in policy H1 is flawed as a significant amount of greenfield land would be lost should their intentions be realised.

With regard to highways comments about the allocated site (taken from page 31/32 of the submitted Housing Background Paper), these were the comments made in the SWDP assessment of the site in 2014, not by the NDP Steering Group. The County Council Highway Authority have been consulted on the Neighbourhood Plan at both the Regulation 14 and 16 Consultation stages and have raised no objections or issues with the allocated site or its access. Studies undertaken by the promoter of the allocated site have demonstrated that there are no insurmountable issues (see rep 14.01 in the submitted Consultation Statement).

b) Comments on Policy H12 Community Facilities

The Parish Council do not consider it necessary to edit the text in the preamble to policy H12 where All Things Wild is mentioned as a visitor attraction in the village as this is factually correct; nor do we think it is necessary to alter the wording of Policy H12. The policy clearly identifies which community facilities it relates to by stating: *“Identified Community Facilities are:”* and goes on to list them. It does not refer to All Things Wild.

The Parish Council agree that the paragraph referenced in this policy under point 9. is incorrect and should be changed to read 6.72.

c) Comments on Policy H14 Retention and Redevelopment of Existing Employment Sites Policy

The tourism sector is an important employer in Honeybourne, and this policy looks to cover a range of rural employment sites dealing with a range of uses, not just the B Class uses, hence the inclusion of The Ranch and All Things Wild. The Parish Council agree that not all of the site occupied by All Things Wild would be suitable for a change of use to, for example B1 use as the existing business occupies a significant amount of greenfield/ agricultural land for keeping animals. However, the buildings for example the café and visitor centre are capable of being used for either a similar tourist attraction enterprise or converted to other business uses providing important employment opportunities for locals; the agricultural land could suitably be returned to more traditional agricultural use or form part of a similar tourist attraction.

It is the intention of the policy, that in the first instance every effort is made to find an alternative employment use for the site. The Plan does not support the loss of sites that are currently providing employment opportunities and seeks to retain them where possible. This will help reduce commuting and support the rural economy.

Representation 10: Gladman Developments Ltd:

a) Comments on Policy H2 Housing Mix

The Plan has had full regard to the NPPF. This policy as stated in the Basic Conditions Report has had regard to paragraph 61 of the NPPF where the size and tenure of housing needed for different groups in the community has been assessed and is reflected in this planning policy.

The policy has been developed in accordance with the objectives of achieving sustainable development and through its evidence base has sought to meet the social objective at paragraph 8 of the NPPF “by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”.

b) Comments on Policy H4 General Design Principles

This policy has been developed with regard to the NPPF and it is not considered to be overly prescriptive, it provides a framework for applicants and does not prevent or discourage appropriate innovation or change.

c) Comments on Policy H7 Local Green Space

The representation suggests that two parcels of land, “7. *Fields around the church and 8. Gate Inn Field*” are extensive tracts of land and do not meet the criteria for designating them as Local green Space. This is not considered to be the case. Evidence to support the inclusion of these two parcels of land is included within the Green Space Background Paper.

They are not considered to be extensive tracts of land particularly given the scale of the settlement; they are well used by the public and were well supported through consultation. They are particularly important to the setting of the church and the proposed additional Conservation Area that has been submitted with the Plan.

Representation 11: Michael Little, Molyneux Rose LLP

All the points raised within this representation are addressed within the submitted Consultation Statement, see responses to comments 4.01-4.15 throughout the document.

Representation 13: Dan Hatcher, Rosconn Strategic Land:

a) Comments on Policy H1 Site to the Rear of Harvard Avenue behind Badham's Garage

It is not considered appropriate to increase the indicative number of dwellings on the scheme. 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. A higher density would create a hard urban edge to this edge of settlement development.

The figure within the policy is indicative and any scheme would be required to deliver a range of smaller homes which potentially have a smaller land take, but also a number of bungalows which have a greater land take, as well as a mix of family homes. Taking the mix into account it is considered that 50 dwellings is an appropriate number for development.

With regard to the phasing in criteria a) the village has seen a significant level of growth since 2011 and has grown by 28%. There is no immediate need to build homes as there are still a number of extant permissions in the parish and a relatively high turnover of properties on the open market.

The representation refers to the cost of some homes in the parish, although these are considered to be selective and do not reflect the range of approved development in the parish or range of properties that have been available on the market. Information on the market is provided within section 7 of the submitted Housing Background Paper. For further detailed and robust justification for why the delivery of the scheme should not commence until 2024 see responses to comments 14.03 and 14.04 in the Consultation Statement and pages 19 to 22 in the submitted Plan.

The representation requests that the percentage of market homes to be marketed to those with a local connection in the first instance for a period of 12 weeks should be reduced to 20% as it may affect viability.

Assuming there are 50 dwellings delivered on the site and that 40% are affordable, the number of market homes to be marketed to those with a local connection in the first instance is just 15 dwellings using the policy's proposed criteria of 50%. This is not a significant number given the size of the parish. If the criteria were to be reduced to 20% this would only provide 6 market dwellings for those with a local connection, this is considered to be too few given the size of the settlement and the local interest from residents wishing to move and stay within the parish as identified in the residents' survey.

Offering market dwellings to those with a local connection in the first instance for 12 weeks is not considered to affect viability. Most new housing developments sell off plan prior to commencement and certainly well before completion of a scheme; therefore the 12 week marketing period can be undertaken at this stage and the Plan offers flexibility in that where there isn't sufficient interest the homes can then be sold on the open market.

It is extremely important that the Plan reflects local evidence and provides homes for locals as identified in the residents' survey. The suggestion to remove the words "*in perpetuity*" from the policy would result in the Plan failing to achieve its aims and deliver homes specifically for locals. Removing this requirement could result in homes being sold on to those outside the parish within a very short time period.

Any legal agreement drafted in association with these homes would need to be drafted to take account of financial hardship and such matters. As referenced in the submitted Plan and the Consultation Statement advice can be sought from the neighbouring authority of Stratford on Avon District Council who has delivered successful schemes at Great Alne and Harbury.

b) Comments on Policy H2 Housing Mix

The Neighbourhood Plan has produced robust evidence to justify why a different mix is required in Honeybourne. As set out in the Consultation Statement local evidence is considered sufficient to deviate from the SWDP which is intended to cover the whole of south Worcestershire. There is a local need for accommodation to enable youngsters to get on the property ladder and also to enable older local residents to downsize. 85 percent of those identified as needing or wanting to move out in the next five years were single or couple households. The policy is based not only on those that had housing need but also a review of housing stock in the parish. In addition to this, the most supported types of homes within the parish were smaller homes and bungalows therefore it is considered appropriate to set locally specific standards.

The policy offers flexibility by stating that "*Development should include the following unless up to date evidence suggests otherwise:*" with details of how this can be demonstrated provided in the Reasoned Justification. Therefore no change is considered necessary to this policy.

c) Comments on Policy H3 House types to meet the needs of our community

The representation suggests amendments to the wording of the policy to reduce the requirement of bungalows to 10% from the policy's proposed 20%. It is considered that reducing the requirement to this level would not provide sufficient numbers of this house type to meet the needs of the community. Apart from the allocated site any further homes permitted during the plan period will be on windfall sites within the development boundary, these are unlikely to be large sites. Should a threshold of 10% be introduced a bungalow may only be delivered on schemes of 10 or more. A threshold of 20% is considered more appropriate as this would deliver a bungalow on smaller schemes of 5 or more. This matter is further explained on pages 66 to 69 of the submitted Consultation Statement.

It is considered that the policy provides flexibility and the ability for applicants to deviate from this where *"it can be demonstrated that there is no longer a need and that this would make the scheme unviable"*.

Representation 14: Reiss Sadler, Wychavon District Council (Officer):

a) Comments on Policy H1 Site to the Rear of Harvard Avenue behind Badham's Garage

The policy refers to the fact that a two year build period would be supported. A two year build period is realistic and takes into account when developers first commence on site through to completion. This timeframe has been based on completions data from Wychavon's Five Year Land Supply Report 2018 containing completions data from 2006-2018 and includes analysis of the 3 larger sites that have been built out in Honeybourne since 2012. The policy does not limit phasing to 2 years but states that it will be supported i.e. it is preferable to allow new households to successfully integrate into the community and for local services, facilities and infrastructure to be able to accommodate the growth.

The District Council incorrectly refer to a marketing period of 12 months at criterion j) in their representation. The policy in fact requires it to be marketed to those with a local connection for a period of least 12 weeks, see paragraph 3 of the Reasoned Justification of policy H1 in the submitted Plan. This is considered to be an appropriate length of time and would not be prohibitive to developing the rest of the site as in most instances this 12 week marketing period can be undertaken prior to commencement and certainly well before completion of the site. This is not an arbitrary length of time but is based on evidence from other developments in the neighbouring planning authority, Stratford on Avon. This is further explained within the Consultation Report under comment 14.05 on page 57-58.

The Parish Council support the District Council's suggestion for the requirement of a Marketing Plan to be added to the policy within criterion j). Details of what a Marketing Plan should contain can be left in the Reasoned Justification.

b) Comments on Policy H2 Housing Mix

The District Council's suggestion to insert the word approximately before criterion b) is not considered necessary as stated in response to the District Council at the Regulation 14

Consultation (comment 11.07 page 63 of the Consultation report), as it is imprecise and does not aid the decision maker.

The District Council highlight that Policy H2 and H3 appear to support unrestricted residential development subject to criteria and suggest adding “*within the defined development boundary for Honeybourne or on allocated sites for residential development*” after “*will be supported*”. The Parish Council are in agreement with the addition of this statement as it adds clarity to the decision taker and it is not the intention of the policy to permit residential development beyond the development boundary.

c) Comments on Policy H3 House types to meet the needs of our community

The comment regarding confusion over the meaning of the last sentence of this policy has been responded to at rep 11.08 on page 67-68 of the Consultation Statement. The Plan does not support blocks of apartments or any high rise development; a maisonette has the appearance of a two storey dwelling and is more appropriate in a rural street scene.

d) Comments on Policy H4 General Design Principles

The District Council’s suggestion to add further references to the relevant Landscape Guidelines is supported to aid the applicant and decision taker.

e) Comments on Policy H8 Protecting the landscape

The District Council’s suggestion to add further detail to paragraphs 6.43 to 6.49 is supported as it aids interpretation and understanding of the Landscape Character.

f) Comments on Policy H9 Trees and Hedges

The District Council’s suggestion to add further detail regarding Root Protection Areas to the policy is supported as it adds clarity.

Representation 15: Katherine Lovesy-Barton, Pegasus Group on behalf of Johnson Brothers:

a) Comments on Appendix 4 Policy Map

The Parish Council agree that the policy map needs to be amended to ensure the entire boundary of the Parish is visible on the map.

b) Comments on Policy H14 Retention and Redevelopment of Existing Employment Sites Policy

The Parish Council agree that within Policy H14 sites 1 and 2 should be merged to reflect that it is one site; ‘*Honeybourne Airfield/Two Shires Park Industrial Estate*’.

With regard to the intention of this policy, it is not intended to deal with expansion beyond existing boundaries as there was no identified need or support for additional land to be allocated for employment. The policy deals with existing sites and the important role they play; it provides a framework to encourage and support their retention and enhancement.

We trust these comments to the responses to the Regulation 16 consultation are useful and provide further clarity for the examination process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stedman', with a stylized flourish at the end.

John Stedman

➤ **Clerk, Honeybourne Parish Council**