

South Worcestershire Development Plan Public Consultation Document

Response by Kemerton Parish Council

SWDP 1. Development Strategy and Settlement Hierarchy

We support this policy and note that it involves a substantial reduction in housing numbers from the West Midlands Regional Spatial Strategy. We note that the text of this policy refers to villages' development boundaries, but that the only large scale maps provided on the website (showing housing allocations in some, though not all, villages) do not show these boundaries. We would argue that there should be an opportunity for villages to reduce their boundaries where it is considered that these have been drawn too widely

We would support the removing of the development boundary of some "Lower Category villages" in the fifth tier of the hierarchy where infilling would not be sustainable.

4.8 Significant Gaps. We consider there should be the possibility of Significant Gaps being identified in villages (as well as urban areas) where there is an identified risk of settlements coalescing. This is particularly important to some of the villages and hamlets around Bredon Hill, which are sometimes clustered very close to one another.

SWDP 2. Employment Housing and Retail Supply

We support this policy. In particular we note that the plan has considered the option of growth at Mitton, paragraph 4.27, and has not included it in its housing supply figures. Kemerton Parish council is strongly opposed to the growth of Tewkesbury northwards, both at Mitton and to the north of Northway/Ashchurch.

SWDP 3. Overarching Sustainable Development Requirements

We do not support this policy as written, although we are in sympathy with its objectives. We consider that it is expressed in too general terms to carry the whole weight of environmental protection. At the time it was written there was a great deal of government guidance in place in the form of PPS and PPG. With the new planning policy framework leaving it to local plans to set their own environmental and other policies, we feel most strongly that there should be additional local plan policies to replace the detailed policies such as ENV1 to ENV16 in the WDLP, or that it should be made clear that this policy covers the same concerns to a degree of detail which would satisfy a planning inspector. (For a detailed analysis of the implications for Kemerton see the response to SWDP 25 below.)

Paragraph 6 of this policy seems to suggest that features of landscape, ecological, geological, heritage, archaeological and amenity value will be fully described in the Worcestershire County Council Historic Landscape Characteristics Report. So far as we can tell by looking at the County Council website the report when completed will not aim to do this. This policy (or others) needs to relate to all the other designations which we regard as vitally important, such as Sites of Special Scientific Interest, Local Wildlife Sites, Geological Sites, Listed Buildings, Conservation Areas, Historic Parks and Gardens and Sites on the Worcestershire

Historic Environment Record. In particular, it needs to specify the local designations which supplement the national ones, such as the Historic Parks and Gardens sites listed in Wychavon's Supplementary Planning Document published in January 2005, most of which are not nationally registered. It is true that much of this local information (though not all – see below) is listed under paragraph 4.76 of the explanatory text for SWDP 5 (Strategic Green Infrastructure), but the latter policy seems to be addressed at large scale development instead of the sort of small scale infilling which is likely to take place in villages such as Kemerton. This policy does not state a requirement to conserve biodiversity as such, for which local authorities have a statutory duty under the NERC Act 2006, nor does it refer to protected species.

SWDP 4. Moving Around South Worcestershire

We support this policy, but would like to see it making reference to the need to provide public transport links between Wychavon and North Gloucestershire where many of our residents work. Conversely we would like an acknowledgement of the traffic problems that would be caused in south Wychavon by large scale development to the north of Tewkesbury/Ashchurch in Gloucestershire.

SWDP 5. Strategic Green Infrastructure

We support this policy in general but are concerned that it is limited to large scale development. Many of the small scale ecological and heritage features which are so important in a village like Kemerton may not be considered '*strategic*'. If every development, however small, was required to protect and enhance existing Green Infrastructure, defined with reference to the list of documents in paragraph 4.76, then our objections to SWDP 3 would be overcome. However, the list in paragraph 4.76 needs to include the list of **Special Wildlife Sites and Geological Sites** compiled by the Worcestershire Local Sites Partnership.

The policy should identify and protect Areas of Great Landscape Value, as identified in the Worcestershire County Structure Plan 1996-2011.

SWDP 6 to SWDP 21. Site Allocations – Urban Areas

Kemerton Parish Council has no comment to make on the urban allocations.

SWDP 22. Rural employment

We support this policy on the understanding that it is subject to the overarching principles of SWDP3. We would not support employment sites on the edge of villages if no account was to be taken of green infrastructure considerations such as the Area of Outstanding Natural Beauty.

SWDP 23. Category 1 Village Sites

We support the principles laid out in this policy, but do not consider that there should be automatic approval of infilling of frontages within the development boundary. There need to be other policies controlling any infilling to prevent cramming of sites i.e.. "garden

grabbing”, detrimental effects on important views within villages, on conservation areas and on listed buildings etc. This could be achieved by making it clear that any infilling must be subject to SWDP3, suitably strengthened to provide the appropriate level of detail. In some villages there may need to be contractions of existing development boundaries as well as extensions. We have no comment to make on particular Category 1 Village sites.

SWDP 24. Category 2 Village Sites

As for SWDP 23.

SWDP 25. Category 3 Village Sites

Kemerton is a Category 3 village. It is also exceptional in that nearly all the village lies within both the Conservation Area and in the Cotswolds AONB. Within its existing development boundary there are two areas designated as Protected Open Space under the WDLP Policy COM13. (There is also a third area just outside the development boundary.) It is welcomed that these spaces are now to be protected under SWDP 43. However apart from these areas, the pattern of development within the Kemerton development boundary is very open, with many houses being set in large gardens. The Parish Council therefore strongly opposes a presumption that *Infill housing within gaps in established built frontages and inside the Development Boundaries as shown on the Proposals Map* will be permitted, unless it is made absolutely clear that this will be subject to the enhancement of both the AONB and the conservation area, as well as having no prejudicial effects on listed buildings or any other valued aspect of local green infrastructure. This will be achieved by making it clear that such infilling is subject to SWDP 3, suitably strengthened as proposed, and to SWDP 5.

As for the proposed site in Kemerton, **SWDP 25/9**, the Parish Council supports this.

SWDP 26. Design

We support the requirement that *“Development proposals must complement the character of the area and the distinctive characteristics of South Worcestershire. In particular, development should respond to surrounding buildings and distinctive features or qualities that contribute to the visual interest of the townscape, streets, and landscape quality of the local area. Design proposals should ensure that all prominent views, vistas and skylines are maintained and safeguarded, particularly where they relate to historic assets.”*

Where Village Design Statements have been adopted by the planning authority as a Local Information Source, they should be specifically recognised by the SWDP.

SWDP 27. Land for Jobs

No comment since this policy seems to be directed at employment sites within towns.

SWDP 28 and 29. Vibrant town centres and Shopping Choice

We support these policies and are anxious to maintain vibrant town centres.

SWDP 30, 31 and 32. Housing to meet local needs

We support the principle of housing being to meet local needs and in particular to provide affordable housing of some sort. We also support Rural Exception sites and consider that it may be easier to bring these forward if they are allowed to include up to 20% market housing. However this should be calculated by built floor area rather than by number of units.

SWDP 33. Gypsies, Travellers and Travelling Showpeople

At the moment Kemerton has no gypsy sites, although there is one near the parish boundary in the adjoining village of Bredon. We would be concerned if the last sentence in this policy, *In addition consideration will be given to the reasonable expansion of existing sites*, could give rise to further gypsy sites between Kemerton and Bredon in an area identified by the Village Design Statements of both parishes as an important 'Significant Gap'.

SWDP 34 and 35. Dwellings in Open Countryside and Dwellings for Rural Workers

We support these, but are concerned that in the past there has been abuse of the provision of dwellings for Rural Workers. We note that SWDP35 seems to be less tightly drafted than COM7 in the WDLP. There seems to be no condition that the dwelling can only be occupied by an agricultural worker once it has been built.

SWDP 36 to 38. Tourism and Tourist Facilities

No comment.

SWDP 39 to 42. Marinas, Mooring and Boating Facilities and Indoor Leisure and Community Facilities.

No comment

SWDP 43. Local Green Networks.

The only sites in Kemerton identified on the proposals map are those in the centre of the village which were identified under COM13 of the WDLP. We welcome the protection of these sites, but also we consider that there should be specific policies protecting valued landscapes and wildlife habitats. In the WDLP, Policy ENV5 protects Special Wildlife Sites, of which Kemerton has two (Carrant Brook and Kemerton Lake). Policy ENV1 recognises the importance of the Cotswolds Area of Great Landscape Value, which covers a wider area than the AONB. We would like to see the AGLV retained and updated. We would also like to see the specific protection for historic parks and gardens provided by WDLP Policy ENV11 retained. Kemerton has no nationally registered sites, but has four locally important examples recorded in Wychavon's Historic Parks and Gardens Supplementary Planning Document.

We are not clear where the protection of built heritage fits into the SWDP. It could, however, be incorporated into a strengthened SWDP 3. Under the WDLP there are policies to protect Conservation Areas (ENV12) and listed buildings (ENV13 to 15). We do not wish to see this

protection weakened in any way. Kemerton has a large Conservation Area, and 41 listed buildings, along with 84 buildings which were formerly listed as Grade III prior to 1970. English Heritage has been promoting the idea of local listing of buildings and we would like to see this specifically included in the SWDP.

SWDP 44. Protecting Open Space for Sport and Recreation.

We support this policy.

SWDP 45. Provision of Open Space in New Development.

We do not envisage new development in Kemerton at a scale to make this policy relevant to us, but we support it in the case of town extensions.

SWDP 46. Energy Efficiency and Renewable Energy.

We support this policy.

SWDP 47. Management of Flood Risk.

We support this policy. Of particular concern in Kemerton is flash flooding resulting from run-off from Bredon Hill, which affected a number of properties in 2007, and on other occasions.

SWDP 48. Water supply and Treatment.

We support this policy.

SWDP 49. Vale of Evesham heavy Goods Vehicle control zone.

We support this policy, which we note would involve cross boundary cooperation on traffic control with Stratford and Cotswold Districts. However we consider that there is the need for further cooperation with adjoining authorities. In particular, we are concerned about heavy additional traffic through narrow roads in Kemerton and other Bredon Hill villages, which would be generated by potential development in north Gloucestershire (see SWDP 4 above).

SWDP 50 and 51. Implementation, phasing and monitoring.

No comment.