

Harvington Submitted Neighbourhood Plan Consultation RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Harvington Parish Council has submitted its Neighbourhood Plan to Wychavon District Council. In accordance with Regulation 16, Wychavon District Council would like to invite comments from individuals and organisations on the submitted Neighbourhood Plan.

This consultation runs from 9am Wednesday 24 October to 5pm Wednesday 5 December 2018.

All comments will be made publicly available and identifiable by name and organisation (where applicable). The personal information you provide on this form will be held and processed in accordance with the requirements of Data Protection Legislation. More information on how we will hold your data can be found at: https://www.wychavon.gov.uk/privacy-policy

Please fill in your details in the boxes below:

Full Name: Martin Friend

Organisation (if applicable): Vincent and Gorbing on behalf Hobden Asset Management Limited

Address (including postcode):

Telephone number:

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):
See statement attached to this form
Please use the space below to make comments on this part of the Neighbourhood Plan.
Please see statement attached to this form.
Please use a separate form for each representation.
Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:
Yes X No
Please email this form to policy plans@wychayon.gov.uk or post it to Planning Policy.

Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT.

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HARVINGTON NEIGHBOURHOOD PLAN

PRE-SUBMISSION VERSION

REGULATION 16 STATUTORY CONSULTATION

RESPONSE ON BEHALF OF HOBDEN ASSET MANAGEMENT LIMITED NOVEMBER 2018

Introduction

- 1. This response to the Harvington Neighbourhood Plan ("HNP") has been prepared by Vincent and Gorbing on behalf of Hobden Asset Management Limited ("HAM") in partnership with Rural Housing Trust (RHT). HAM own land to the south of Village Street that is a proposed allocation under Policy IH5. The allocation is welcomed by HAM and we look forward to working with the Parish Council to bring forward development in a sensitive manner when the HNP is adopted.
- 2. Overall, HAM considers that the HNP is sound, well thought through and evidenced, and well presented, and HAM supports its approach and contents. HAM believe that the Basic Conditions Statement demonstrates that the 'Basic Conditions' set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) have been satisfied.
- 3. Some general comments are made as well as some specific comments on particular policies where changes are suggested.

Compliance with the basic conditions

In our view, the HNP is in conformity with the National Planning Policy Framework as updated in July 2018 (NPPF2). It takes the correct balance to environmental protection whilst allowing growth and will contribute to sustainable development. It is in general conformity with the strategic policies contained within the South Worcestershire District Plan (SWDP) Core Strategy; and has properly considered and demonstrates compliance with the appropriate EU obligations both in terms of Strategic Environmental Assessment and Habitat Regulations Assessment.

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Policy DB – Development Boundary

5. HAM **supports** Policy DB and considers that the boundary has been drawn in a reasonable manner given existing development and that proposed in the plan. The land south of Village Street identified in IH5 is rightly included within the development boundary and it is noted that Map 6 clearly indicates that this land represents a logical extension to the built up area within extending into the open countryside.

Policy IH1 – Housing Growth

- 6. HAM **supports** policy IH1 in defining a broad number of units to be brought forward in the lifetime of the plan.
- 7. HAM welcomes the additional wording in point 5 of the explanation to the policy which confirms that the target of 40 dwellings in the village boundary is not intended to be a ceiling.
- 8. We remain of the opinion that it may help the clarity of the policy if the "around 35 units" as expressed in Policy IH5 is also reflected in policy IH1 i.e. "This growth will be achieved principally through **around 35 units** at a housing allocation (see Policy IH5) and natural windfall development."

Policy IH2 - Housing Mix

9. HAM raises no objection to policy IH2 *per se* although some flexibility in the targets expressed would be beneficial given that the policy will apply to developments that are small in scale. For example, 10% of the 35 units proposed on IH5 would be 3.5 units and to aid the creation of the appropriate balance of units, HAM consider it preferable that the policy allows *either 3 or 4* bungalows and 2 bed starter units respectively with the exact detail to be agreed at the time the development is brought forward. HAM suggest the replacement of "at least 10%" with "circa 10%".

Policy IH3 – Parking Provision

10. The proposed parking standards of one car parking space for each bedroom is clearly in excess of those within the current Worcestershire County Council Interim Parking Standards February 2016 which requires 2 spaces for 2/3 bed units and 3 spaces for 4 or more bedrooms. Although the rural location of Harvington may justify an increase on the current county-wide standard HAM are concerned that for larger dwellings, the application of these standards could result in car dominated development that would not be in character with the village. We would suggest that 4 spaces are required for 4 bedroom units or larger. This also reflects the fact that those who purchase larger houses

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- are not necessarily larger family groups with more cars but use additional bedrooms for other purposes such as offices, recreational spaces or guests.
- 11. Since the Reg 14 consultation, the policy has been modified with the addition of the clause which states that garages are not classed as parking spaces. We are concerned that this will result in larger dwellings having an even greater area of parking around them. We would recommend that this is amended to indicate that garages smaller than 3m x 7m internal dimensions would not be classed as a parking space. The concern expressed in the plan regarding conversion into living spaces could be addressed by adding to the policy that where appropriate, in order to minimise any on-street parking, permitted development rights will be withdrawn or planning conditions used to prevent the conversion of garages into living accommodation.

Housing Allocation – Policy IH5

- 12. As per our comments above, HAM **supports** policy IH5 and is keen to work with the Parish Council to bring forward a suitable scheme. HAM considers that the site selection process was rigorous and the allocation is sound.
- 13. HAM has undertaken significant technical work on the site over several years. There are no impediments to development. A suitable access can be achieved from Village Street. There are no on-site constraints such as services or ground contamination that would prevent development. Any planning application will be supported by the requisite technical and environmental studies to ensure that the proposals represent a sustainable form of development.
- 14. HAM welcome the minor changes from Reg 14 consultation with the amendment to the boundary of the allocation to include the footpath corridor and the amendment to paragraph 3 to simply state that vehicular access will be from Village Street with details to be considered as part of any planning application.

Vincent and Gorbing

30 November 2018