

Education

The Worcestershire County Council's Children, Families, and Communities (CFC) department notes Policy LFL2, allowance for the provision of the Expansion of Harvington C of E First and Nursery School. The school is either full or almost full in all year groups and is anticipated to accept full reception classes in 3 out of the next 4 years. Additional housing developments within the catchment area will likely require additional facilities at the school to support demand in the future, the protection of land to support this possibility is strongly supported by CFC.

Birth rates within the catchment area of Harvington CE First School in September 2017-August 2018 were at a similar level to those from the previous year. Demand for places at the school is therefore anticipated to remain elevated.

The Neighbourhood Plan (the Plan) outlines the objective to increase the number of dwellings in the village by at least 50 by 2030. It should be noted that under the average pupil yield from the 2011 census, 50 dwellings will likely yield between 1-2 school age children per year group, amounting to approximately 8 additional children of First School age.

Flood Risk Management

We support Policy EH6 – Flooding. We welcome that it requires all new developments to use permeable drives; however, we would welcome a more comprehensive approach to Sustainable Drainage Systems (SuDS). SuDS should be encouraged on all developments in the Neighbourhood Planning area, regardless of their size. The Plan should specify that at surface level SuDS provide the best opportunity for multiple benefits and they should be considered before below ground SuDS. The maintenance of SuDS for the lifetime of the development should be encouraged by the Plan.

"Development should not result in an unacceptable risk to the quality of the receiving river, stream, brook or other water body, nor transfer the risk of increased flooding of the receiving water body".

This paragraph should include "no additional water quantity".

- "All new developments should use permeable drives and hard standing wherever practical to allow the on-site absorption of rain water rather than permitting 'run off' which can lead to flooding".

It is important that the Plan makes it explicit that permeable drive/paving need to be adequately maintained in order to sustain its functionality. We are concerned with the use of 'hardstanding'. Tarmac driveways do not allow for 'on-site absorption'.

Minerals and Waste

The Plan makes no reference to the Waste Core Strategy or Minerals Local Plan. These documents form part of the statutory Development Plan for the area alongside the South Worcestershire Development Plan, and we consider that the Plan should make some reference to this. We recommend the following change and footnote (shown in bold) to paragraph 1.1.5:

"Once made, this NDP will form part of the Development Plan at the local level alongside the adopted South Worcestershire Development Plan, **the adopted Worcestershire Waste Core Strategy and the saved policies of the County of Hereford and Worcester Minerals Local Plan**. It will be used to determine planning applications in accordance with Planning and Compulsory Purchase Act 2004 Section 38 (6) in that the determination of planning applications 'must be made in accordance with the Plan unless material considerations indicate otherwise'."

We note the stated aspiration in section 5.7 to restrict traffic from any civil engineering, minerals extraction or similar activities inside or within 10 miles of the Neighbourhood Area from passing through Village Street, Leys Road or the Conservation Area. We agree that this aspiration should not form a specific policy, as such a blanket restriction may not pass the tests of reasonableness for a planning condition set out in paragraph 55 of the National Planning Policy Framework 2018 (namely that "Planning conditions should be kept to a minimum and only imposed where they are necessary,

relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.") The traffic implications of any proposed mineral development would be fully considered through the planning application process.

Historic Environment and Landscape

We welcome the draft Plan considers the historic environment, landscape and green infrastructure and is supported by a robust evidence base. The Plan is well set out and gives clear reference to supporting documentation including the Village Character Appraisal and Village Design Plan as well as to relevant county and district policy.

We would encourage that the Plan addresses the potential development or re-development of traditional farmsteads. We recommend that the Plan references the Worcestershire Farmstead Assessment Framework as a key document to inform the sustainable development of farmsteads, through identifying their historic character, significance and potential for change http://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1023/historic_farmstead_characterisation

Public Rights of Way

We are pleased to see that the section EH-1, D of the Plan focuses on protecting and enhancing the public rights of way network in the area. However, we have some concerns with the proposed reopening of the ford to become a cycle link suggested in T2 Community Project: River Avon Foot + Cycle crossing. This is likely to be a very expensive project with environmental and safety issues that will need to be addressed. If Harvington Parish Council is in a position to fund such a project then the Public Rights of Way Team should be consulted at a very early stage to enable any concerns we have to be raised and addressed if possible. This would include the proposed change in status of footpaths to bridleways which may be required.
