

30 June 2021

## Norton-juxta-Kemspey Neighbourhood Plan Regulation 16 Consultation - Wychavon District Council Officer Comments

These Officer comments are made on behalf of Wychavon District Council (WDC), as the Local Planning Authority, on the Regulation 16 Norton-juxta-Kemspey Neighbourhood Plan (NJKNP) for consideration by the Independent Examiner.

### NJK1

Criterion D – not sure how an application could demonstrate that it had incorporated references to the historical home of the Worcestershire Regiment?

Criterion F – this criterion talks about maintaining views and vistas but there is no identification of specific views and vistas which this criteria should apply to in the Neighbourhood Plan?  
Notwithstanding this, suggest rewording of this criteria as follows:

*F. Demonstrates that the local landscape quality has been considered and informed by the most up to date Landscape Character Assessment guidance document <sup>FOOTNOTE</sup> and ensures views and vistas are maintained wherever possible.*

*FOOTNOTE - Appendix 3 of the Neighbourhood Plan*

### NJK2

Criterion C – minor typo “to” needs removing.

Criterion D – concern that native species might not always be the most appropriate or desirable, for example in applications relating to domestic properties – where native trees might be too large at maturity or ornamental species might be more appropriate (these too can have biodiversity benefits, as well as native species). Suggest more appropriate wording would be as follows:

*D. Any replacement tree and hedgerow planting shall be of species appropriate to the local setting.*

It would then be down to the LPA, in determining planning applications and associated landscape schemes, to consider what would be appropriate in each case.

It may also be worth highlighting that native species planting suggestions are contained within the Worcestershire Landscape Type Information Sheets perhaps by a Footnote to the following webpage:

[https://www.worcestershire.gov.uk/downloads/download/808/worcestershire\\_landscape\\_type\\_profiles](https://www.worcestershire.gov.uk/downloads/download/808/worcestershire_landscape_type_profiles)

Criterion E – this criterion prescribes the number of new trees that shall be planted in new developments – both residential and non-residential. There is a caveat saying that where it is not possible to secure the planting within the site, the trees should be planted at a suitable location outside the site. Whilst this is aspirational, there is concern as to whether thought has been given to where those off-site trees might be planted and whether there is adequate scope for this in the long term? If trees have to be provided to comply with the policy but, over time, there are too few places available to accommodate the trees within the parish off-site, then this could cause problems.

### NJK3

The requirement for all new development to require a GI plan seems to be too onerous. It is suggested it should apply to only certain development through a set criterion on size or number of units. Therefore, it is suggested that the policy is reworded slightly at the beginning to read as follows:

*A Green Infrastructure Plan should be provided for [specified types] new development to show how the development can protect ...*

Further, instead of: “green infrastructure provision should:” suggest reword to read “The Green Infrastructure Plan should:”

There needs to be a distinction made between a plan which provides for the how the area that includes GI provision may be developed and used, and the actual provision of GI itself. This policy is clearly more to do with the former (how these areas will be developed and used) rather than the latter (new planting, restoration of hedgerows etc.).

### NJK4

Suggest renumbering of Local Green Spaces as LGS1, LGS2, LGS3 etc. with site location and map reference to follow.

Suggest rewording of final sentence of policy as follows:

*Development that would result in the loss or partial loss of a designated Local Green Spaces will not be supported unless very special circumstances arise which outweigh the need for protection.*

### NJK6

Policy title is not included within the green background box, which should be addressed for consistency.

Typo in Reasoned Justification Paragraph 2 – “safely” should be “safety”.

## NJK7

Recommend defined list of community facilities are included within the policy itself.

Criterion E – current wording comes across as negative; could reword to:

*E. Demonstrates that the existing or proposed use would have, or would retain, sufficient vehicular and cycle parking to serve the use.*

## NJK9

Criteria C – suggest addition of text at the end of the criterion as follows:

*C. The development proposed will not have an adverse impact on any archaeological, architectural, historic or environmental features, and where appropriate provides mitigation;*

Criteria F – suggest addition of text at the end of the criterion as follows:

*Electric vehicle charging facilities are provided on site that meet the standards in the most up to date version of the Worcestershire Streetscape Design Guide. Development proposals that exceed the minimum standards will be looked upon favourably.*

## NJK10

Given the Development Boundaries are subject to review as part of the wider South Worcestershire Development Plan Review process, suggest removal of “in the adopted South Worcestershire Development Plan” or addition of “or as amended in the subsequent South Worcestershire Development Plan Review”.