

# Ombersley and Doverdale Neighbourhood Development Plan

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## Response to Regulation 16 representations

### Introduction

1. The Ombersley and Doverdale Neighbourhood Development Plan (NDP) was submitted by Ombersley and Doverdale Parish Council (the Qualifying Body, QB) to Wychavon District Council on 17 February 2021. A consultation in accordance with Regulation 16 was carried out by the District Council from 26 February to 16 April 2021; a total of 14 representations were made.
2. The QB has been given the opportunity to respond to the representations made at the Regulation 16 stage. The QB wishes to respond to the following representations:
  - Lloyds Educational Foundation
  - RCA Regeneration for Spitfire Homes
  - Savills for Ombersley Conservation Trust
  - Severn Trent Water
  - Worcestershire County Council.
3. The QB's responses to these representations are set out in the schedule overleaf. The opportunity to respond is appreciated. The QB has no comment to make on the other representations. Those in support of the NDP including from Wychavon District Council and other consultation bodies are welcomed.

## Responses by the QB to selected representations to the Ombersley and Doverdale Neighbourhood Development Plan Regulation 16 consultation

### Abbreviations used

HNA:	Housing Needs Assessment
LPA:	Local Planning Authority
NPPF:	National Planning Policy Framework
NDP:	Ombersley and Doverdale Neighbourhood Development Plan Submission Draft 2021
PPG:	Planning Practice Guidance
QB:	Qualifying Body (Ombersley and Doverdale Parish Council)
SHMA:	Strategic Housing Market Assessment
SWDP:	South Worcestershire Development Plan 2016
WDC:	Wychavon District Council

Summary of representation	QB response
<p><b>Lloyds Educational Foundation</b></p> <p>The proposed designation of the Lloyds Allotments as Local Green Space under policy TOAD8 will not afford the flexibility which may be required as to the future use of the land. The site is of excessive size compared to the other proposals for Local Green Space designation.</p>	<p>The QB considers that the Lloyds Allotments meets the NPPF requirements for the use of the Local Green Space designation, for the reasons set out at Appendix B of the NDP and which are not disputed by this representation. Regarding the size of the site, NPPF paragraph 100 requires that Local Green Spaces are local in character and not extensive tracts of land. PPG confirms that there are no hard and fast rules about how big a Local Green Space should be and that a degree of judgement will inevitably be needed (paragraph: 015 Reference ID: 37-015-20140306). In the local context, the site has clear boundaries and a single, distinctive use; these attributes and its close, functional relationship to nearby areas of housing ensures it is appropriately local in character and is not an extensive tract of land.</p>
<p><b>RCA Regeneration for Spitfire Homes</b></p> <p>Policy TOAD2 does not take account of the latest District-level evidence on housing mix in the SHMA of September 2019.</p>	<p>Policy TOAD2 has been prepared taking into account the local HNA undertaken for the NDP together with consultation feedback in the questionnaire survey, particularly responses to question 9. The QB considers that it is important for the long-term health of the community that all age groups who wish to live in Ombersley and Doverdale are supported. An earlier version of the policy in the draft plan was the subject of comments by WDC which included reference to the latest SHMA of September 2019. Whilst in this</p>

Summary of representation	QB response
	<p>respect it was considered that the local HNA with its parish-level analysis was to be preferred, other changes were made to the policy in response to the WDC comments. The Regulation 16 representation by WDC confirms that their earlier comments have been taken account of and that they have no further comments to make. The QB considers that the policy provides a clear statement of housing requirements relevant to the specific requirements of the Neighbourhood Area, as distinct from the District-level analysis in the 2019 SHMA, and has appropriate flexibility to allow new information to be taken into account.</p>
<p><b>Savills for Ombersley Conservation Trust</b></p> <p>It is disappointing that the NDP does not make a housing site allocation given the abundance of potentially suitable sites.</p> <p>Policy TOAD2 does not take account of the latest District-level evidence on housing mix in the SHMA of September 2019.</p>	<p>The availability and suitability of land for new housing was the subject of in-depth investigation for the NDP, with a view to pursuing a joint approach to this matter in the period up to 2041 with the on-going SWDP Review (this will roll the SWDP forward from 2030 to 2041). In the event, it was not possible to identify a suitable site for allocation. The QB does not accept the reference in this representation to an “abundance” of such sites. The site referred to in the representation, land off Sandys Road, has featured in the SWDP Review so far, but is understood to have access issues which will need to be further considered as the plan process continues. Other candidate sites were also found to be constrained by access and traffic management issues. It was decided to restrict the NDP to an end-date of 2030 and leave the matter of site allocations to be determined in the SWDP Review, noting the national guidance that neighbourhood plans are not obliged to contain policies addressing all types of development (PPG paragraph: 040 Reference ID: 41-040-20160211).</p> <p>See response above to RCA Regeneration for Spitfire Homes.</p>
<p><b>Severn Trent Water</b></p> <p>Policies TOAD3 and TOAD9 should include reference to the need</p>	<p>The QB does not consider these additional policy references to be needed given that provision is already made in PPG (by the paragraph referenced in the representation). Sustainable drainage</p>

<b>Summary of representation</b>	<b>QB response</b>
<p>to manage surface water in accordance with the drainage hierarchy as set out in PPG.</p> <p>TOAD8 should acknowledge that Local Green Spaces can accommodate flood alleviation schemes without detriment to their primary function.</p> <p>Properties should be built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p>	<p>is also covered by SWDP 29. However, if a reference is thought to be required, it is suggested this be limited to an addition to TOAD9. This is because TOAD3 already includes a cross-reference to TOAD9, so this policy will be automatically applied to proposals for the development of the Woodhall Lane site.</p> <p>The QB considers this addition is not required. Development in Local Green Spaces is to be managed as per Green Belt (NPPF paragraph 101), and national policy already sets out the exceptional circumstances in which such development may proceed (NPPF paragraphs 145 and 146, the latter including reference to engineering operations). Adding to these provisions at the local level, as suggested in the representation, is unnecessary and could be confusing. Moreover, none of the proposed Local Green Spaces are at risk of flooding or close to any areas of flood risk, so the practical relevance of this representation is limited.</p> <p>This is already included in policy TOAD9 criterion 4 and SWDP 30.</p>
<p><b>Worcestershire County Council</b></p> <p>This representation suggests making reference to existing policy documents such as the NPPF, the Worcestershire Streetscape Design Guide and the Planning for Health in South Worcestershire Supplementary Planning Document.</p>	<p>The QB agrees that suitable references to the Worcestershire Streetscape Design Guide and the Planning for Health in South Worcestershire Supplementary Planning Document would be useful for applicants and decision makers. This could be by way of an addition to NDP paragraph 8.1 after the final sentence which refers to SWDP 21. It is not considered necessary to include a reference to NPPF provisions on health and wellbeing, or to further sustainable design features to promote climate change adaptation given the provisions of TOAD9 and paragraph 8.5 of the NDP.</p>

Ombersley and Doverdale Parish Council  
22 May 2021