

11 August 2016

## Drakes Broughton and Wadborough with Pirton Submitted Neighbourhood Plan – Wychavon DC Comments

The below comments are made by officers representing various departments of Wychavon District Council on the submitted Drakes Broughton and Wadborough with Pirton Neighbourhood Plan for consideration by the examiner.

Overall, comments made to the draft Drakes Broughton and Wadborough with Pirton Neighbourhood Plan, dated 8 March 2016, have not been picked up in the Submitted Version of the NP. As a result, many of the comments made below are simply repeated from the draft consultation response, which is also attached and should be taken as part of Wychavon's response to this consultation and considered by the examiner as such.

### Reiss Sadler/Andrew Ford – Planning Policy

Para 1.4 – Drakes Broughton and Wadborough with Pirton Parish Council's Neighbourhood Area application was formally approved by Wychavon District Council's Executive Board on 17 March 2015 following the recommendation to do so from 5 February 2015 Planning Committee.

Figure 1 – Should be updated to show the Neighbourhood Area as designated as opposed to the application consultation version.

Para 2.2 – Add to the end of the paragraph "as well as the policies in the SWDP and National Planning Policy".

Figure 2 – Requires an update in line with the current position.

Para 3.3 – Insert "Council" to the end of the paragraph.

Para 4.29 – Very limited history and background for Pirton, especially compared to the information on Drakes Broughton and Wadborough. This gives off the impression that the NP is more focused on the latter two villages.

Para 5.2 – Should reference the submitted Consultation Statement?

Para 5.6 – Are walks a village facility?

Para's 5.15 and 5.16 – Very low consultation response rates in Wadborough and Pirton which raises the question as to whether this is representative and a strong enough basis for policy making?

Para 6.2 – Final bullet point could reference post-adoption monitoring as a way of keeping people informed about the progress of the DBWPNP.

Para's 6.5 - 6.7 – SWDP adopted in February 2016 and wholly replaced the now extinct WDLP.

Para 6.7 – Drakes Broughton is identified in the SWDP as a category 2 villages meaning it has at least two key services including a shop and access to at least one daily service for employment (as assessed in the Village Facilities and Rural Transport Study 2012).

Para 6.8 – DBWPNP is no longer a draft.

DBWP1 and DBWP2 – Policies are very similar and could easily be amalgamated into one.

DBWP4 – Policy simply repeats SWDP14 and SWDP15. Even so, the affordable housing element will need to be updated in line with the recent Court of Appeal judgement. Also, brownfield sites of 15 or more dwellings are not covered under this policy.

Para 8.10 – Unfair assumption that those in need of affordable housing are likely to have a lower car ownership rate?

Para 8.13 – Date decisions?

Para 8.14 – Remove reference to WDLP. Also, not in NP's remit to alter development boundaries as these are under strategic realm of the SWDP.

DBWP6 (a) – Identify on a map the “network of paths, fields, watercourses etc.”?

Para 8.25 – Cycle routes should be referenced NCN 45 and NCN 442.

Para's 8.28 and 8.29 – Is it evidenced that Worcestershire Parkway will increase tourism in the Neighbourhood Area? Also, although Worcestershire Parkway is not within the NA, worth mentioning in the introduction as a nearby major transport infrastructure project.

DBWP7 – Evidence to support the Locally Important Views?

Para's 8.33 - 8.35 – Any background evidence to support the Dark Skies (DBWP8) policy and was it raised as an issue during consultation?

DBWP10 – Needs to be made clearer so a distinction can be made between policy criteria and 'other open spaces'.

Para 8.38 – Is designation the correct word here? Sentence should state that NPPF paragraphs 76 and 77 are supportive of Neighbourhood Plan's allocating Local Green Spaces.

Para 8.40 – Are 'other open spaces' assessed, what purpose do they serve and what is the statutory backing?

Para 8.42 – Reference the Manual for Streets.

DBWP12 – New Homes Bonus is not subject to planning and could be withdrawn.

Para 8.47 – Also reference SWDP24.

DBWP14 (h) – Should say Development Boundary and not settlement boundary.

Para 9.2 – There is scope for a review of the SWDP but not certain and no set date.

Map 3 – What is the impact of planning commitments on Key Views H, I, L and P?

View I – Not much of a view at all?

## **Jane Dobson, Economic Development**

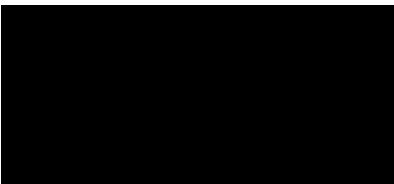
To re-iterate my comments made to the draft DBWPNP consultation and more specifically policy DBWPNP14 (g) – it is felt that the marketing requirement of two years is excessive, 12 months in line with the SWDP is considered more appropriate.

## **Eileen Marshall, Landscape**

In addition to previous changes requested that have not been made, there are additional errors that should be corrected.

The document does not refer to the latest version of the Worcestershire County Council Landscape Character Assessment (it should be August 2012 and not October 2011). Also, the parishes in the Neighbourhood Area fall within 4 identified character areas and not 2 as states in the document.

Kind Regards,



Reiss Sadler

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**Planning Officer (Policy)**



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