

5 December 2018

Harvington 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 submitted Harvington Neighbourhood Plan (HNP) for consideration by an Independent Examiner.

Para 1.1.4 – also should make mention of the SWDP Review which has recently commenced and will extend the Plan Period to 2041 once adopted, currently scheduled for November 2021.

Suggest Policy DB is suffixed by 1 in policy box.

Policy DB1 (c) – this is a more relaxed approach than the SWDP which requires evidence to demonstrate that other uses are not viable before supporting re-use of rural buildings for residential development.

Policy DB1 Footnote 19 – remove as it may cause confusion.

Policy EH1 A (c) – ‘Brownfield Land Registry’

Policy EH2 – proposed Local Green Space GS11; is this reasonably close to the community it serves as per NPPF Paragraph 100 a)? In addition, Explanation Paragraph 1 refers to Paragraphs 76-78 of the NPPF; however the revised NPPF discusses Local Green Spaces at Paragraphs 99-101.

Policy EH4 4) – should this refer to two areas (i.e. 1 and 2 on Map 10), not three? Question whether policy can resist development by utilities. Consider policy word that limits impact if the case.

Policy BT2 – no mention here of any limit to the scale of development, nor of NPPF policies which advocate sequential approach to retail and main centre uses – too permissive?

Policy T1 2) – requirement for all new dwellings to provide electric car charging facilities raises potential viability concerns; suggest policy is amended to support the provision of electric car charging facilities in new dwellings.

Policy IH2 – too prescriptive and may not be appropriate for all sites; suggest policy is amended to support the provision of single-storey accommodation and 2 bedroom starter homes.

Policy IH3 – parking standards detailed are over and above those sought by Worcestershire County Council as the Local Highway Authority. Policy IH3 4) promotes garage or parking courts which are generally not considered to be best practice in new development layout.

Policy IH4 1) – difficult to apply policy in terms of assessing a residential proposal against existing estates of comparable housing mix. Suggest wording points to schemes adhering or reflecting surrounding residential development densities.

Policy IH6 1) (a) – what is meant by ‘highest possible sustainable standards’? Only required to meet current building regulations. Perhaps include footnote that sets out standards that new build is encouraged to meet.

Policy IH6 1) (b) – difficult to apply. Consider “where achievable ...”.

Policy IH6 2) – 10 or more units threshold considerably smaller than 100 or more units threshold in SWDP27 B; what evidence is there to support this? This could raise a viability issue and need to balance with other thread of sustainable development economic development.