



South Worcestershire Development Plan Review: Preferred Options

In the Introduction it would be very helpful if a list of the relevant plans is included, especially as some readers do not find it easy to use the website.

Also, all of the photographs should have a title under them on the location of the area.

Objectives:

Objective 8 would be improved by the omission of the word most, as it is now a central component of sustainable development that all new development should have good access to local services. To allow for some essential development connected with rural businesses, a reference to exceptional circumstances could be added.

Objective 13 should be supported by a plan of the Green Infrastructure Network as it currently exists and the wording expanded to refer to the identification and protection of the GIN.

Objective 14 should be reworded to refer to Best and Most Versatile agricultural land (as used in the NPPF – paragraph 170) especially as it is this wording that is used in Policy SWDPR 12 – part H. Also to include reference to the protection of the flood plain.

A separate objective should be included to improve the infrastructure of towns that have and are to take significant new housing and employment development, to deal with the problems being experienced with sewage and dirty water overflowing into the river network; with traffic issues including parking provision and highway improvements, especially the upgrading of the A46 and with broadband speed improvements.

Perhaps along the following lines:

To work with partners, in particular Severn-Trent Water Authority, to improve the infrastructure within the main towns.

Spatial Strategy

SWDPR 2 A ii.

It needs to be clear what 'appropriate areas' are therefore these need to be defined in this policy. Otherwise compliance with this policy is guesswork.

SWDPR 2 A iii.

This section should include reference to the Conservation Areas as well as the AONBs



Paragraph 6.11

It would help to identify the Significant Gaps with reference to the Development Boundary of either both settlements on either side of the Gap or the boundary of the larger settlement if the smaller settlement does not have a defined Development Boundary.

Green Infrastructure SWDPR 4

Section 4 will be impossible to demonstrate compliance with in the absence of a Districts wide plan showing the existing GI Network; it is a priority to prepare such a plan to include with the Adopted Development Plan. See also comments above on Objective 13.

Transport – SWDPR 3 Delivering Transport Infrastructure.

A new section J should be included to refer to the support by Wychavon District Council for the work being undertaken by the Highways Agency assessing the improvement options for the dualling of the A46 from Stratford to the M5 Junction 9.

Economic Growth – SWDPR10.

Section B should be reworded to 'Proposals for *changes to or* new retail or leisure facilities ...' to encourage existing facilities to make use of vacant upper floors. This will help in bringing back life to town centres, without compromising the Class A1 retail/Class A2 Professional Services within the Primary Shopping Frontages in the towns. Part B ii. To be expanded to include 'live/work' units.

A5 Uses should be prevented from using premises with a prescribed distance (e.g. 500m) of any school, to also improve health and wellbeing, with a cross reference to Policy SWDPR 7.

Smaller Scale Retail Facilities – M ii. The reference to locally needs to be defined in distance terms, so that it is possible to demonstrate compliance with this policy. This definition should be made the subject of consultation with the farm shops in the Plan area to establish a reasonable distance.

Paragraph 12.40, reference to Supplementary Planning Documents, neighbourhood plans and Local Development Orders needs to be expanded to include a timescale for the preparation of such documents. This will allow local businesses and community groups, including Civic Societies to know when the appropriate document will be prepared for its town centre and it will demonstrate commitment to this much needed work. Evesham Civic Society will be seeking a commitment from Wychavon District Council to undertake the preparation of a SPD for the Town Centre Conservation Area as a matter of urgency, to agree a programme of measures by businesses and the local authorities to stem the continuing gradual decline of the town centre vitality.

Paragraph 12.45 – the abbreviation SWC needs to be replaced with the full name for easier understanding.



Housing – SWDPR 12 Effective Use of Land.

Section G refers to a target for the use of Brownfield Land for housing. To ensure the protection of Brownfield Land in the countryside or outside the Development Boundaries, the wording in Section G should be extended to refer to only Brownfield Land within Development Boundaries.

Resource Management – SWDPR 31 Renewable and Low Carbon Energy.

Section D i. Refers to Paragraph 154 of the NPPF to justify the limitation in this section to the indemnification of the site in an Neighbourhood Plan.

Paragraph 154 states that *‘When determining planning applications for renewable and low carbon development, local planning authorities should:*

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable⁴⁹. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

At national level there is encouragement for renewable energy schemes and the NPPF does NOT suggest a limitation to sites within neighbourhood plans. In most cases, wind turbines are developed in isolated rural areas, for which no neighbourhood plan will ever be prepared. Thus this policy would impose a severe restriction on new facilities in the area covered by the Development Plan.

It would be entirely reasonable to impose a limitation on sites within the AONB’s instead.

Resource Management SWDPR 33 Section F.

The problems of water management and flooding would be better addressed by encouraging developers of small sites where the inclusion of SUDS on site is impracticable and thus very expensive, to make a financial contribution to schemes off-site to tackle the problem of water run-off upstream of the watercourses in the locality such as tree planting, re-engineering of the watercourse to slow down the water flow etc.

Tourist Development

SWDPR 39 A iv.

This section needs strengthening to request detailed demonstration of the lack of availability of brownfield land, by changing ‘consideration’ to ‘detailed demonstration’.



This section makes no reference to the need to improve tourist destinations such as historic areas, especially historic town centres, to encourage increased visits and thus contribution to the local economy through accommodation and spending in the shops, pubs, cafes and restaurants in the area. Investment is desperately needed in some centres, such as Evesham to make sure that visitors are not only encouraged to come but are well provided for with parking, ease of town centre access, signage, accommodation etc.

Strategic Housing and Employment Land Availability Assessment 2019 – Evesham Plan

The shading on the plan for site CFS0367 shows two shades of brown; the darker shade is not included in the key. The interactive Policies Map shows the darker brown as green, as a new Green Infrastructure site. The Evesham plan should be changed to show the extent of the GI area in green, with a reference in the key.

Evesham Housing Allocations. Table 13.

The three new allocated housing sites will all generate more traffic and have additional impact on the inadequate infrastructure in the town. Cheltenham Road and Pershore Road already have serious traffic congestion, as do the town centre roads. The release of all three sites should be resisted until some highway and infrastructure improvements have been undertaken. Hopefully some improvements will have occurred by the last 10 years of the plan, so these sites should be included only for development after 2031, unless at the time of intervening 5-yearly reviews clearly have evidence of improvements.

The two mixed housing sites need to be limited to car-free housing component, thus helping to reduce the traffic impact of more cars in the town centre. Legal agreements should be imposed and thus referred to in the appropriate policy, to limit the occupation to residents without a car.

Evesham Employment Allocations. Table 21.

CFS0680 Sawmills Walk/Brian Close.

The local access road, Briar Close, is narrow and it is the main route to St Ecgwins Middle School. There is no footpath over the Black Bridges over the railway, therefore the release of this site should be made conditional on the provision of a pedestrian footbridge. It should be added to the Policy so that it is clear to any potential developer what would be required and thus factored in to the economic assessment of the cost of any scheme.

CFS0099 Land off Evesham Road, north of Twyford roundabout.

This is an isolated site, outside the Development Boundary, with no easy access by pedestrians or cyclists and thus all employee access would most likely be by car, increasing pressure on the local highways, which are already congested at peak times and often at other times of the day as well. The expansion of employment uses into the countryside would inevitably lead to further development outside the Development Boundary of the town. This site should be deleted in favour of further development at Vale Park.



CSF0142 and CFS0143 Land adjacent to Broadway Road, Wickhamford.

This site should be called Land south of A44 from the A46 junction towards Longdon Hill i.e. remove Wickhamford, as this is misleading.

If Vale Park is to be extended north on these parcels of land, no direct access onto the A44 should be allowed, due to serious highway safety implications. All access must be through Vale Park and on to the A46 at the roundabout provided to serve this development. A significant landscape buffer must be provided alongside the southern boundary of the highway, to retain a rural ambiance to the view from the A44.

It would however provide a much more compact site, not dictated by the odd field boundaries that limit these two allocations and CFS0891, if a more southerly/easterly extension, defined not by field boundaries but by access, landscape impact, topography and archaeological and ecological impacts (if any).

Any extension to Vale Park must provide good access for pedestrians and cyclists, which is why the existing access is best, especially following the recent investment in the traffic light controlled crossing of the A46.

All uses in any expanded area should also be limited to Use Classes B1 and B8.

Evesham Town Centre Plan.

The Primary Shopping Area should be extended north as far as the Post Office on the west side and as far as No 86 High Street on the east side, to include the shops within this area.

The boundary of the Town Centre appears to be drawn on an out-of-date survey of the use of the buildings in the centre. It should be redrawn following an up to date survey to ensure that only appropriate uses are included. The following are examples of the changes that are needed, but is not a comprehensive list:

- Extension south to include Merstow Green car park and the new retail units and veterinary practice and hospital.
- Removal of the residential properties that are on the margins of the currently designated town centre area e.g. west side of Brick Kiln St and south of Bewdley Street; northwest of Mill Street and the isolated property Avonbridge House..

Evesham Housing and Employment Land Availability Assessment 2019 Plan

It would be very helpful if the existing and proposed allocations and the Development Plan boundary are shown on an up to date OS base map. For example, the large area now occupied by the football club and the soon to be relocated cricket club are not shown.

The Development Boundary needs to be updated to include all built development, such as the area west of Cheltenham Road along Bridleway View and to correct the anomaly at the west end of Pershore Road.

Glossary – include a definition of a Travel Plan, when it is required and how its implementation will be monitored and enforced.